

**ORDER 2020-136  
IN RE SETTLEMENT AGREEMENT**

**CENTAUR ACQUISITION, LLC d/b/a INDIANA GRAND RACING & CASINO  
20-IG-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 23<sup>rd</sup> DAY OF NOVEMBER, 2020.**

**THE INDIANA GAMING COMMISSION:**



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Michael B. McMains, Chair

ATTEST:



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Jason Dudich, Secretary

**STATE OF INDIANA  
INDIANA GAMING COMMISSION**

<b>IN RE THE MATTER OF:</b>	)	
	)	<b>SETTLEMENT</b>
<b>CENTAUR ACQUISITION, LLC</b>	)	<b>20-IG-02</b>
<b>d/b/a INDIANA GRAND RACING &amp;</b>	)	
<b>CASINO</b>	)	

**SETTLEMENT AGREEMENT**

The Indiana Gaming Commission (“Commission”) by and through its Executive Director Sara Gonso Tait and Centaur Acquisition, LLC d/b/a Indiana Grand Racing & Casino (“Indiana Grand”), (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. IC 4-38-5-4(a) provides that a certificate holder or vendor may accept wagers on professional and collegiate sporting events approved for sports wagering by the commission, and other events as approved by the commission. A certificate holder or vendor may use data selected in a manner approved by the commission to determine whether a wager is a winning wager.
2. Chapter 7, Section 1(a) of the Emergency Rules for Sports Wagering provides that before accepting wagers on any event category from patrons, a sports wagering operator must receive event category approval from the executive director or the executive director’s designee. The sports wagering operator shall provide notice to the executive director or the executive director’s designee and such notice shall include the name of the sports governing body and a description of its policies and procedures regarding event integrity. The commission reserves the right to prohibit the acceptance of any wagers, and may order the cancellation of wagers and require refunds on any event for which wagering would be contrary to the public policies of the state.
3. On August 10, 2020, the Commission’s Sports Wagering Investigator notified Gaming Agents that Caesars had allowed wagers to be placed for Chinese Taipei Baseball League. The Chinese Taipei Baseball League was not a Commission-approved event category.
4. On August 17, 2020, the Commission’s Sports Wagering Investigator notified Gaming Agents that NYX Digital, the platform provider for Caesars (which includes Indiana Grand), added Chinese Taipei Baseball League on April 8, 2020 in Indiana when it was approved in New Jersey.

**COUNT II**

5. 68 IAC 15-2-2(a) provides cash transactions involving cash in or cash out in excess of ten thousand dollars (\$10,000) must be reported by occupational licensees.
6. 68 IAC 15-2-4(a) provides 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.
  - (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.
7. 68 IAC 15-2-6 provides 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. (D) If the individual is an alien or nonresident of the United States, the passport number, alien registration number, or both, and the issuing country for both. (E) Agent's date of birth. (F) Type and number of identification used to verify patron's identity. (3) Part II. Description of transaction, including the following: (A) Whether multiple currency transactions, none of which individually exceeds ten thousand dollars (\$10,000), comprise this report. (B) The nature of the transaction. Indicate if more than one (1) type of transaction is involved, and indicate the amount for each: (i) currency exchange; (ii) cash in; or (iii) cash out. (C) The total amount of the cash transaction, in United States dollars, being reported. This must be completed for reports even if a check is being cashed. (D) The date of the transaction.

8. 68 IAC 15-2-7 provides occupational licensees are prohibited from providing information to casino patrons in an effort to assist the patron in circumventing the reporting requirements. Occupational licensees are responsible for preventing a patron from circumventing the reporting requirements if the occupational licensee has knowledge, or through reasonable diligence in performing his or her duties, should have knowledge of the patron's attempt to circumvent the reporting requirements.
9. On March 11, 2020, Security notified Gaming Agents that a large chip redemption was about to take place. The Gaming Agent contacted the Cage and Credit Manager who advised that a patron was attempting to redeem \$130,000 in chips won at a table game. The patron had presented a United States Employment Authorization as proof of identification to complete the transaction. The Gaming Agent advised this was not an acceptable form of identification and the chips could be deposited in safekeeping until the patron could produce a valid identification.
10. The Gaming Agent was later advised by the Gaming Agent Supervisor that the Cage and Credit Manager authorized and issued a \$5,000 payout to the patron even after the Gaming Agent Supervisor explained his concerns with regard to Title 31 compliance and reporting requirements. The Cage and Credit Manager also returned \$125,000 in chips to the patron rather than placing them in safekeeping.
11. Gaming Agents later received an email from the Table Games Assistant Shift Manager detailing the possible structuring for this transaction. The Table Games Assistant Shift Manager was familiar with the patron as he had interacted with him during his time at the casino. The Table Games Assistant Manager also advised that the patron and two (2) unidentified companions asked the Cage and Credit Manager questions about Title 31 Compliance and the Cage and Credit Manager disclosed Currency Transaction Reporting (CTR) guidelines while allowing an agreed payment amount without the patron providing proper identification.

### COUNT III



12. 68 IAC 15-2-5 provides the casino licensee shall establish policies and procedures for the notification of surveillance prior to completing a currency transaction report (CTR). The procedures shall include, at a minimum, the following:
  - (1) The window cashier, pit boss, table games shift manager, or table games manager must notify surveillance.
  - (2) Surveillance shall take a photograph of the patron from the surveillance camera.
  - (3) Prior to the completion of the transaction, surveillance shall notify the window cashier, pit boss, table games shift manager, or table games manager that it has an acceptable photograph.
13. On February 4, 2020, Surveillance notified Gaming Agents that a Cage Cashier failed to request a photo when a patron completed a total of \$11,974 in transactions at the cage.
14. On February 9, 2020, while reviewing surveillance reports, it was discovered that an Assistant Table Games Shift Manager self-reported to surveillance that a Table Games Supervisor failed to request a photo when a patron bought in for \$1,000 at a table game placing him over \$10,000 in transactions for the day.
15. On July 16, 2020, Surveillance notified Gaming Agents of a CTR violation. On July 9, 2020, a patron redeemed \$3,000 in chips at the cage and later on the same gaming day redeemed an additional \$9,550 in chips at the cage, completing transactions in excess of \$10,000 in a gaming day. The cage failed to request a photo by surveillance.

#### COUNT IV

16. IC 4-38-11-1 provides that the bureau shall provide information to a certificate holder concerning persons who are delinquent in child support.
  - (b) Prior to a certificate holder disbursing a payout of six hundred dollars (\$600) or more, in winnings, from sports wagering to a person who is delinquent in child support and who is claiming the winning sports wager in person at the certificate holder's facility, the certificate holder:
    - (1) may deduct and retain an administrative fee in the amount of the lesser of:
      - (A) three percent (3%) of the amount of delinquent child support withheld under subdivision (2)(A); or
      - (B) one hundred dollars (\$100); and
    - (2) shall:
      - (A) withhold the amount of delinquent child support owed from winnings;
      - (B) transmit to the bureau:
        - (i) the amount withheld for delinquent child support; and
        - (ii) identifying information, including the full name, address, and Social Security number of the obligor and the child support case identifier, the date and amount of the payment, and the name and location of the licensed owner, operating agent, or trustee; and
      - (C) issue the obligor a receipt in a form prescribed by the bureau with the total amount withheld for delinquent child support and the administrative fee.

- (c) The bureau shall notify the obligor at the address provided by the certificate holder that the bureau intends to offset the obligor's delinquent child support with the winnings.
- (d) The bureau shall hold the amount withheld from the winnings of an obligor for ten (10) business days before applying the amount as payment to the obligor's delinquent child support.
- (e) The delinquent child support required to be withheld under this section and an administrative fee described under subsection (b)(1) have priority over any secured or unsecured claim on winnings except claims for federal or state taxes that are required to be withheld under federal or state law.
17. Chapter 5, Section 2(2)(W) of the Emergency Rules for Sports Wagering provides that prior to beginning sports wagering operations, a sports wagering operator must submit for approval under 68 IAC 11 internal controls for withholding winnings from delinquent child support obligors in accordance with IC 4-38-11, including a plan for complying with IC 4-38-11 if the sports wagering operator allows the redemption of tickets via mail.
  18. 68 IAC 11-9-2(a) provides 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. 68 IAC 11-1-3(c)(4) provides 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. Indiana Grand's approved internal control procedures, N-1 and V-17, describe the procedures for Child Support Intercept Process.
  21. Gaming Agents conducted an audit of the Child Support Arrears Delinquency Registry (the "CSADR") for January 2020. The results of this audit found two (2) individuals were not searched through the CSADR system: one (1) at the time a taxable jackpot was won and one (1) at the time sports wagering winnings in excess of \$600 was won.
  22. Gaming Agents conducted an audit of the CSADR for February 2020. The results of this audit found one (1) individual was not searched through the CSADR system at the time sports wagering winnings in excess of \$600 was won.
  23. Gaming Agents conducted an audit of the CSADR for March 2020. The results of this audit found four (4) individuals were not searched through the CSADR system: one (1) at the time a taxable jackpot was won and three (3) at the time sports wagering winnings in excess of \$600 was won.
  24. Gaming Agents conducted an audit of the CSADR for June 2020. The results of this audit found one (1) individual was not searched through the CSADR system at the time a taxable jackpot was won.

25. Gaming Agents conducted an audit of the CSADR for August 2020. The results of this audit found three (3) individuals were not searched through the CSADR system at the time sports wagering winnings in excess of \$600 was won.

#### COUNT V

26. IC 4-35-7-2 provides, in relevant part, “[e]xcept as provided in subsection (c), a person who is less than twenty-one (21) years of age may not be present in the area of a racetrack where gambling games are conducted.”

27. 68 IAC 1-11-1(c) provides that a person under twenty-one (21) years of age shall not be present in a casino.

28. On March 5, 2020, Gaming Agents became aware that an underage person was attempting to enter the casino using another’s person’s identification. The underage person advised that she had been previously allowed entry into the casino using the same identification. Surveillance was able to confirm that the underage person had been allowed entry onto the casino floor on March 1, 2020 using the same identification. On March 1, 2020, Security failed to identify that the patron was using another person’s identification to enter the casino. Security caught the false ID on March 5, 2020; therefore, it should have been caught when it was presented on March 1, 2020.

29. On June 20, 2020, Security notified Gaming Agents that an underage person was on the casino floor. The underage person was discovered by Surveillance. Surveillance was alerted when the underage identification was scanned at the garage entrance to the casino. The Security Officer scanned the underage identification on two occasions and it failed both times but the Security Officer allowed the underage person to enter the casino.

30. On August 7, 2020, Surveillance notified Gaming Agents that an underage person was allowed entry into the casino by Security at the garage entrance. Surveillance was alerted when the underage identification was scanned. The Security Officer confirmed he scanned the identification and did not observe the warning alerting him that the identification was for an underage person, allowing the underage person to enter the casino.

#### COUNT VI

31. 68 IAC 2-6-6(c)(5)(B) provides if a casino licensee converts an electronic gaming device, the casino licensee must perform a coin test to ensure that the electronic gaming device is communicating with the central computer system. If the electronic gaming device is not communicating with the central computer system, the electronic gaming device must be disabled.

32. On March 3, 2020, Slot Techs notified Gaming Agents that an electronic gaming device (EGD) was found in service after failing two coin tests. The EGD was in service for approximately forty (40) hours without a coin test.

33. On September 8, 2020, a Slot Tech notified Gaming Agents that an EGD was found in service without a coin test.
34. 68 IAC 11-1-3(c)(4) provides 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.
35. 68 IAC 13-1-1(b)(2) and (3) provides 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.
36. Indiana Grand's approved internal control procedures, E-13, describe ticket issuance.
37. On July 29, 2020, a Slot Tech Supervisor notified Gaming Agents that an EGD was able to print out a TITO in excess of \$3,000. The Slot Tech Supervisor checked the EGD setting and it was determined that the ticket limit was set at \$1,000,000.
38. 68 IAC 2-6-31(b)(4) provides the casino licensee shall notify the executive director and the enforcement agent of the rate of progression for that progressive link.
39. On July 6, 2020, Gaming Agents were requested at an EGD due to issues with a progressive incrementation rate error. The Slot Tech Supervisor identified that two (2) EGD's had a significantly lower progressive incrementation rate than was approved in the EGD system. These EGD's are a five (5) level progressive with five (5) different incrementation rates and reset values. The EGD's were found to be set at the decimal value instead of the percentage value which resulted in the EGD's progressing at a slower rate than it would have if it had been set correctly. 10,065 progressive jackpots had been hit on these two (2) EGD's amongst all progressive levels resulting in \$141,031.85 jackpot payouts. It was determined that the progressive meters had been set incorrectly since October 22, 2018.

#### **COUNT VII**

40. 68 IAC 6-1-1 provides an excluded person is prohibited from entering gaming areas and a casino licensee or operating agent must evict any excluded person from its gaming area if the casino licensee or operating agent knows or reasonably should know that the person is an excluded person.
41. On January 1, 2020, a Gaming Agent audited the statewide exclusion list. It was determined that six (6) statewide excluded persons were not flagged.

#### **COUNT VIII**



42. 68 IAC 12-1-5(c)(7) provides the surveillance system must provide an overall view of pit areas and gaming tables capable of clearly identify the amount and incrementation of a progressive jackpot contained on a progressive jackpot display of a live gaming device.
43. On February 12, 2020, Surveillance notified Gaming Agents that a progressive display did not have surveillance coverage. A review of surveillance determined that on February 10, 2020, a Facilities employee and unknown vendor lowered the progressive display out of view of the camera. It was corrected on February 12, 2020.

### COUNT IX

44. 68 IAC 11-4-4 provides that at any time when a live gaming device is closed, chips remaining at the live gaming device shall be counted by the appropriate level of occupational licensee assigned to the live gaming device and verified by the pit boss or the equivalent.
  - (b) A live gaming device inventory slip shall be prepared.
  - (c) The occupational licensee and the pit boss or the equivalent who observed the count of the contents of the tray shall sign the inventory slip at the time of closing the live gaming device attesting to the accuracy of the information recorded.
  - (d) The occupational licensee shall immediately deposit the closer in the drop box.
  - (e) The pit boss or the equivalent shall place the opener on the live gaming device tray in a manner that the amounts on the opener may be read through the cover, and lock the transparent live gaming device tray lid in place.
45. On February 12, 2020, Gaming Agents received notification that table game's closing inventory was incorrect. The closer had incorrectly reported an extra \$40,000 in gray \$5,000 chips.
46. On March 11, 2020, Gaming Agents received notification that table game's closing inventory was incorrect. The closer had incorrectly reported \$6,700 in black \$100 chips rather than \$6,600 in black \$100 chips.
47. On August 2, 2020, Gaming Agents received notification that table game's closing inventory was incorrect. The closer had incorrectly reported \$2,950 in green \$25 chips rather than \$2,450 in green \$25 chips.
48. On August 5, 2020, Gaming Agents received notification that table game's closing inventory was incorrect. The closer had incorrectly reported \$23,000 in purple \$500 chips rather than \$23,500 in purple \$500 chips. The closer paperwork was also incomplete.
49. 68 IAC 15-12-3 provides 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.

50. 68 IAC 15-12-4(3) provides that surveillance shall be notified that a live gaming device credit is being processed.

51. On February 11, 2020, Surveillance notified Gaming Agents that a Security Officer failed to notify Surveillance prior to transporting a table credit to the cage.

52. On June 15, 2020, Surveillance notified Gaming Agents that an incorrect table fill had been accepted at a table game. The table fill requested was for \$2,000 in green \$25 chips and \$200 in red \$5 chips. The fill sent to the table game was \$2,000 in black \$100 chips



and \$200 in red \$5 chips. The error was not detected by Cage, Security, Surveillance, or Table Games during the acceptance of the table fill.

53. On August 9, 2020, Surveillance notified Gaming Agents that an incorrect table fill had occurred. When the error was discovered, the casino failed to properly void the table fill.
54. On September 11, 2020, Surveillance notified Gaming Agents that an incorrect table fill had occurred. Two (2) table fills were being processed and delivered at the same time. The fills were switched and delivered to the incorrect table. One fill was for \$20,600 and the other was for \$600. Both incorrect fills were accepted at each table.
55. 68 IAC 14-3-5(a) & (b) provides all dice or playing cards that are not being utilized at a live gaming device shall be kept in locked compartments. Dice and playing cards shall not be left at a live gaming device while unattended.
56. On February 2, 2020, a Casino Manager notified Gaming Agents that two (2) eight (8) deck shoes of playing cards were left unsecured at a closed table game.
57. On February 4, 2020, an Assistant Table Games Shift Manager notified Gaming Agents that four (4) decks of playing cards were left unsecured at a pit podium.

### **TERMS AND CONDITIONS**

Commission staff alleges that the acts or omissions of Indiana Grand by and through its agents as described herein constitute a breach of IC 4-35, IC 4-38, the Emergency Rules for Sports Wagering, 68 IAC and/or Indiana Grand's approved internal control procedures. The Commission and Indiana Grand hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against Indiana Grand.

Indiana Grand shall pay to the Commission a total of \$60,000 (\$500 for Count I, \$7,500 for Count II, \$3,000 for Count III, \$11,000 for Count IV, \$16,500 for Count V, \$7,500 for Count VI, \$1,500 for Count VII, \$1,500 for Count VIII and \$11,000 for Count IX) and submit a corrective action plan for Count VI addressing how Indiana Grand will rectify the progressive incrementation rate violation with patrons and provide what new procedures will be put into place to prevent future occurrences 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 each Count 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, Indiana Grand agrees to promptly remit payment in the amount of \$60,000, as

well as submitting a corrective action plan as outlined above 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 Indiana Grand.

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

\_\_\_\_\_  
Sara Gonso Tait, Executive Director  
Indiana Gaming Commission

  
\_\_\_\_\_  
Mike Rich,  
General Manager  
Centaur Acquisition, LLC

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Date



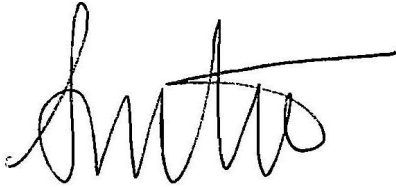
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\_\_\_\_\_  
Sara Gonso Tait, Executive Director  
Indiana Gaming Commission

\_\_\_\_\_  
Mike Rich,  
General Manager  
Centaur Acquisition, LLC

11/20/20

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date