

IN THE MISSOURI GAMING COMMISSION

In Re:)
) DC-25-064
St. Louis Gaming Ventures, LLC)
d/b/a Hollywood Casino St. Louis)

PRELIMINARY ORDER FOR DISCIPLINARY ACTION

Comes now the Missouri Gaming Commission acting in its official capacity pursuant to 11 CSR 45-13.050, and states as follows:

1. The Missouri Gaming Commission (the “Commission” or “MGC”) is a State Commission created under Chapter 313, RSMo, with jurisdiction over gaming activities, including riverboat gambling activities, in the state of Missouri.
2. The Commission issued a Class A gaming license to PENN Entertainment, Inc. to develop and operate Class B gaming licensees in the state of Missouri.
3. PENN Entertainment is the parent organization or controlling entity of St. Louis Gaming Ventures, LLC.
4. The Commission issued a Class B riverboat gambling license to St. Louis Gaming Ventures, LLC, to conduct games on and operate the excursion gambling boat known as Hollywood Casino St. Louis (the “Casino”).
5. As the holder of a Class B license, St. Louis Gaming Ventures, LLC, d/b/a Hollywood Casino St. Louis is subject to the provisions of Sections 313.800 to 313.850, RSMo, and the regulations promulgated thereunder by the Commission.

STATEMENT OF FACTS¹

6. For gaming day July 18, 2024, MGC Tax Auditor Amy Trachsel reviewed supporting documentation for the 7:00 p.m. Bounty tournament, which included a list of bounty winner names along with signatures. In reviewing the bounty slips, a total of forty-three (43) bounties was listed. The BRAVO report showed forty-four (44) participants. Trachsel sent an email to Casino Revenue Audit Manager Susan Burch on July 31, 2024, inquiring if all the bounty slips were sent and if not, to provide an exception report for the error. On July 31, 2024, Burch replied that the dealer failed to have the bounty winner sign for the final bounty. Burch provided an exception report and stated that all forty-four (44) participants received their bounty fund.
7. For gaming day August 4, 2024, Trachsel’s review of supporting documentation for the MSPT Event Summer 24 \$250 Black Chip Bounty NLH tournament included a list of bounty winner names and signatures. In reviewing the list, Trachsel noted that one

¹ GR 20250107001

bounty winner did not sign for the bounty. Trachsel sent an email to Burch for an explanation and Burch stated that she could only speculate that the dealer/supervisor forgot to get the player signature.

8. For gaming day August 29, 2024, Trachsel's review of supporting documentation for the 7:00 p.m. Bounty tournament included a list of bounty winner names and signatures. In reviewing the bounty list, Trachsel noted that a bounty name and signature was missing.
9. For gaming day October 20, 2024, Trachsel reviewed supporting documentation for the 1:00 p.m. \$150 Double Bounty tournament, which included a list of bounty winner signatures but no name for three (3) of the fifty-two (52) bounties paid out. Documentation did show an exception report was completed.
10. For gaming day November 21, 2024, Trachsel reviewed supporting documentation for the 7:00 p.m. \$100 Bounty tournament, which included a list of bounty winner names and signatures with two (2) bounty winner signatures missing as well as an exception report for the discrepancy.
11. For gaming day December 26, 2024, Trachsel reviewed supporting documentation for the 7:00 p.m. \$100 Bounty tournament, which included a list of bounty winner names and signatures with one (1) bounty winner signature missing. The documentation included an exception report.
12. In addition to the violations during the above-listed 2024 gaming days, four (4) of the last five (5) tax audit reports had audit findings where the licensee failed to obtain a bounty name and/or signature.

LAW

13. Section 313.805, RSMo, states, in pertinent part, as follows:

The Commission shall have full jurisdiction over and shall supervise all gambling operations governed by sections 313.800 to 313.850. The Commission shall have the following powers and shall promulgate rules and regulations to implement sections 313.800 to 313.850:

* * *

(5) To investigate alleged violations of sections 313.800 to 313.850 or the Commission rules, orders, or final decisions;

(6) To assess any appropriate administrative penalty against a licensee, including, but not limited to, suspension, revocation, and penalties of an amount as determined by the Commission up to three times the highest daily amount of gross receipts derived from wagering on the gambling games, whether unauthorized or authorized, conducted during the previous twelve months as well as confiscation and forfeiture of all gambling

game equipment used in the conduct of unauthorized gambling games. Forfeitures pursuant to this section shall be enforced as provided in sections 513.600 to 513.645;

* * *

(19) To take any other action as may be reasonable or appropriate to enforce sections 313.800 to 313.850 and the Commission rules.

14. Section 313.812, RSMo, states, in pertinent part, as follows:

14. A holder of any license shall be subject to imposition of penalties, suspension or revocation of such license, or if the person is an applicant for licensure, the denial of the application, for any act or failure to act by such person or such person's agents or employees, that is injurious to the public health, safety, morals, good order and general welfare of the people of the state of Missouri, or that would discredit or tend to discredit the Missouri gaming industry or the state of Missouri unless the licensee proves by clear and convincing evidence that it is not guilty of such action. The Commission shall take appropriate action against any licensee who violates the law or the rules and regulations of the Commission. Without limiting other provisions of this subsection, the following acts or omissions may be grounds for such discipline:

(1) Failing to comply with or make provision for compliance with sections 313.800 to 313.850, the rules and regulations of the Commission or any federal, state or local law or regulation;

(2) Failing to comply with any rule, order or ruling of the Commission or its agents pertaining to gaming[.]

15. 11 CSR 45-5.180 states, in pertinent part, as follows:

(3)(F) The Class B licensee's accounting department shall keep a complete record of rules of the event and all amendments thereto, including criteria for entry and winning, names of all entrants, all prizes awarded and prize winners, source documentation evidencing the payout amounts which shall be signed by the prize winners, for a minimum of two (2) years from the last date of the tournament and shall be made readily available to the commission upon request.

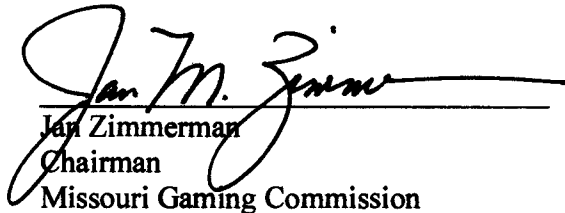
VIOLATIONS

16. The acts or omissions of employees or agents of the Casino, as described above, constitute a failure of the Casino to properly obtain the names and signatures of bounty winners, thereby violating 11 CSR 45-5.180(3)(F).

17. St. Louis Gaming Ventures, LLC, d/b/a Hollywood Casino St. Louis is therefore subject to discipline for such violations pursuant to Sections 313.805 and 313.812.14(1) and (2), RSMo.

PENALTY PROPOSED

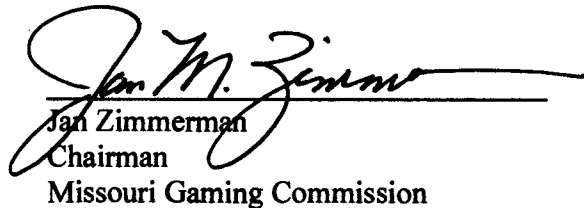
18. Under Section 313.805, RSMo, the Commission has the power to assess any appropriate administrative penalty against St. Louis Gaming Ventures, LLC, as the holder of a Class B license.
19. THEREFORE, it is proposed that the Commission fine St. Louis Gaming Ventures, LLC, d/b/a Hollywood Casino St. Louis the amount of five thousand dollars (\$5,000.00) for the violations set forth herein.


Jan Zimmerman
Chairman
Missouri Gaming Commission

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused a true and correct copy of the foregoing to be mailed, postage prepaid, this 28th day of August, 2025, to:

Michael Jerlecki, GM
Hollywood Casino St. Louis
777 Casino Center Drive
Maryland Heights, MO 63043


Jan Zimmerman
Chairman
Missouri Gaming Commission