

IN THE MISSOURI GAMING COMMISSION

In Re:)
IOC-Boonville, Inc.) DC-25-089
d/b/a Isle of Capri Casino, Boonville)

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 Caesars Entertainment, Inc. to develop and operate Class B gaming licensees in the State of Missouri.
3. Caesars Entertainment, Inc. is the parent organization or controlling entity of IOC-Boonville, Inc.
4. The Commission issued a Class B riverboat gambling license to IOC-Boonville, Inc., to conduct games on and operate the excursion gambling boat known as Isle of Capri Casino, Boonville (the "Casino").
5. As the holder of a Class B license, IOC-Boonville, Inc., d/b/a Isle of Capri Casino, Boonville, 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. On February 19, 2025, at approximately 12:07 a.m., Corporal Adam Martin (Cpl. Martin) responded to the Casino lobby and made contact with an underaged patron that was stopped when trying to enter the gaming floor. The patron was escorted to the MGC office and submitted to an interview. During the interview, the patron stated that he was unaware that you had to be twenty-one (21) years old to access the Casino gaming floor. He also stated that he had accessed the gaming floor and gambled just a few hours prior without issue. Cpl. Martin reviewed the surveillance video and confirmed that the underaged patron had entered the Casino at 8:14 p.m. on February 18, 2025, and proceeded to gamble at E-Roulette #G3705 and EGD #E2505 before exiting through the turnstiles. Casino Security Officer Timothy Newsome observed the patron entering the gaming floor and failed to verify his age by requesting identification. Newsome's license was suspended for two (2) days as a result of this violation.

¹ GR 20250219001

7. This was the fourth incident of an underage patron being allowed on the Casino gaming floor without being asked to present identification. The following incidents were cited in separate gaming reports:
- a. On November 2, 2024, at approximately 11:15 p.m., Trooper Daren Belardo (Tpr. Belardo) was contacted by Casino Security Manager Rick Allen Carmack, who advised that a minor entered the gaming floor and was currently located at the Casino's Cage. Tpr. Belardo made contact with the underaged patron and escorted her to the MGC office where she submitted to an interview. During the interview the patron stated that she was unaware that she had to be twenty-one (21) years old to access the gaming floor. She also stated that the Security Officer at the turnstile never asked for identification. Tpr. Belardo reviewed the surveillance video and confirmed that Security Officer Justin Joiner appeared to be looking down at his computer when the underaged patron passed through the turnstiles and accessed the gaming floor. Joiner was issued a non-punitive letter as a result of the violation.
 - b. On November 30, 2024, at approximately 4:50 a.m., Tpr. Belardo was contacted by Casino Security Supervisor Dennis Nowell, who advised that a minor entered the gaming floor and was currently located at the Casino's Cage. Tpr. Belardo made contact with the underaged patron and escorted him to the MGC office where he submitted to an interview. During the interview the patron stated that he was unaware that he had to be twenty-one (21) years old to access the gaming floor. Tpr. Belardo reviewed the surveillance video and confirmed that Security Officer Skyler Engel observed the underaged patron entering the casino floor through the main turnstile. He appeared to look directly at the patron as he approached the turnstile and entered onto the casino floor without asking him for identification. Engel's license was suspended for one (1) day as a result of the violation.
 - c. On December 6, 2024, Master Sergeant Lutjen met with Security Manager Richard Carmack and discussed the ongoing issues regarding minors accessing the gaming floor without security asking for identification. During this meeting, Carmack advised that employees would be receiving more training on relevant rules and regulations. Master Sergeant Lutjen explained the importance of preventing minors from accessing the gaming floor and that security needed to ask for identification.
 - d. On December 7, 2024, at 3:28 a.m., Slot Supervisor Charles Beesley contacted security and Trooper Mason Hollis (Tpr. Hollis) as he escorted an underaged patron off the gaming floor. The patron was escorted to the MGC office where he submitted to an interview. During the interview, the patron stated that he thought the gaming age was eighteen (18) years old. Security Officer James Sedgwick was stationed at the security podium at the time and submitted a written statement indicating that he saw the underaged patron access the gaming floor wearing a blue hoodie with the hood up and that he could not really see his face. Sedgwick failed to request identification. Sedgwick's license was

suspended for two (2) days as a result of this violation and the Casino was issued a non-punitive notice of violation after this third incident of an underage patron accessing the gaming floor within five (5) weeks.

LAW

8. 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.

9. 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 of 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[.]

10. The Commission's MICS, Chapter N states, in pertinent part, as follows:

4.01 Persons under 21 years of age shall not be permitted access to the casino floor or be allowed to place a wager.

* * *

4.04 The enforcement of admission and gambling restrictions for persons under 21 years of age shall include, at a minimum, checking their government-issued photo identification.

11. Section 313.817, RSMo, states, in pertinent part, as follows:

4. A person under twenty-one years of age shall not make a wager on an excursion gambling boat and shall not be allowed in the area of the excursion boat where gambling is being conducted;

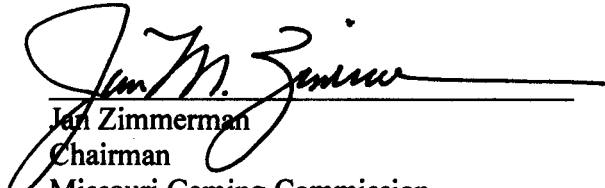
VIOLATIONS

12. The acts or omissions of employees or agents of the Casino, as described above, constitute a failure of the Casino to effectively train employees to adhere to the rules and regulations of the Commission or any federal, state, or local law or regulation, thereby violating the Commission's MICS, Chapter N, Sections 4.01 and 4.04 and Section 313.017, RSMo.

13. IOC-Boonville, Inc., d/b/a Isle of Capri Casino, Boonville, is therefore subject to discipline for such violations pursuant to Sections 313.805 and 313.812.14(1) and (2), RSMo.

PENALTY PROPOSED

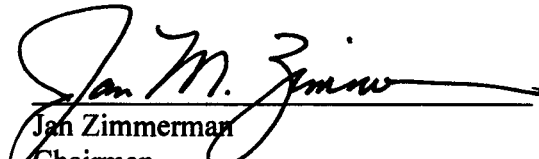
14. Under Section 313.805, RSMo, the Commission has the power to assess any appropriate administrative penalty against IOC-Boonville, Inc., as the holder of a Class B license.
15. THEREFORE, it is proposed that the Commission fine IOC-Boonville, Inc., d/b/a Isle of Capri Casino, Boonville, the amount 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 29th day of August, 2025, to:

Kathryn Schuster, GM
Isle of Capri Casino, Boonville
100 Isle of Capri Boulevard
Boonville, MO 65233


Jan Zimmerman
Chairman
Missouri Gaming Commission