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January 29, 2026

Certified Mail/Return Receipt Requested

Donald Wren, General Manager
St. Jo Frontier Casino
777 Winners Circle
St. Joseph, MO 64505

Dear Mr. Wren:

Pursuant to 11 CSR 45-13.050, you are hereby notified of proposed disciplinary action against HGI-St. Jo, LLC d/b/a St. Jo Frontier Casino as the holder of a Class B riverboat gaming license issued by the Missouri Gaming Commission. Enclosed please find the Preliminary Order for Disciplinary Action ("Order"), DC-26-004, which sets forth the facts in support of the proposed discipline and references the regulatory and statutory sections involved. The Commission's Order also proposes a fine in the amount of \$10,000.

You may file a request for a hearing by serving such a request on the Commission Executive Director within 30 days of the date of the attached Order. The hearing would be governed by 11 CSR 45-13. If a request for hearing is not filed, the proposed disciplinary action set forth in the Order shall become a final order of the Commission and the fine amount must be paid in full. Pursuant to Missouri Constitution Article IX, Section 7, payment in the form of a check must be made payable to:

Buchanan County Treasurer as administrator of the Buchanan County School Fund.

The check should be forwarded to the Missouri Gaming Commission, P.O. Box 1847, Jefferson City, Missouri 65102.

Sincerely,

Michael A. Leara
Executive Director

MAL/af
Enclosure
cc: Rob Cantwell, Esq.

IN THE MISSOURI GAMING COMMISSION

In Re:)
) DC 26-004
HGI – St. Jo, LLC)
d/b/a St. Jo Frontier Casino)

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 Affinity Interactive to develop and operate Class B gaming licensees in the state of Missouri.
3. Affinity Interactive is the parent organization or controlling entity of HGI – St. Jo, LLC.
4. The Commission issued a Class B riverboat gambling license to HGI – St. Jo, LLC to conduct games on and operate the excursion gambling boat known as St. Jo Frontier Casino (the “Casino”).
5. As the holder of a Class B license, HGI – St. Jo, LLC, d/b/a St. Jo Frontier Casino 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. In September 2024, Missouri Western State University (“MWSU”) contacted Casino Director of Marketing Stefane Nichols (“Nichols”) about possible sponsorship opportunities.
7. On October 28, 2024, Nichols sent two TV advertisements to MWSU for broadcast during their Homecoming football game on November 2, 2024.
8. According to MWSU’s Factbook 2024-2025, forty-seven percent (47%) of the student population was under the age of twenty-one (21) during the fall of 2024.
9. In November 2024, Nichols sent a sponsorship agreement and marketing strategy to Affinity Interactive's Chief Marketing Officer Brad Egnor.

¹ GR 20250527002

10. On January 7, 2025, Nichols spoke with General Manager Donald Wren (“Wren”) regarding the sponsorship agreement. Wren then contacted St. Jo Frontier Casino Accounting Manager Jeanne Swope (“Swope”). Swope informed Nichols that corporate Contract Approval Requests (“CARS”) should be submitted through her. Swope further informed Nichols the contract required his signature. Nichols backdated the CARS to November to reflect the original time he submitted the contract and signed it.
11. On February 17, 2025, Outside Gaming Counsel for Affinity Interactive, Jennifer Griffin (“Griffin”), sent an email to MGC General Counsel Nikki Evans (“Evans”) regarding the sponsorship agreement between MWSU and the St. Jo Frontier Casino. The email sought guidance regarding the agreement and its compliance with MGC rules and regulations.
12. On March 5, 2025, Griffin received a response from Evans which explained that MGC believed the sponsorship agreement to be a violation of 11 CSR 45-5.053 (3)(C). Griffin acknowledged receipt of Evans’s response and forwarded that correspondence to VP and Deputy General Counsel for Affinity Interactive, Joshua Carlson (“Carlson”). Carlson then forwarded that email to Nichols. No further action was taken regarding the sponsorship agreement.
13. On March 7, 2025, Nichols attended a zoom call with Carlson and Wren to discuss MGC's feedback. During the meeting they agreed to contact MGC Licensing and Discipline Manager LeAnn McCarthy (“McCarthy”) for guidance in how to reposition the sponsorship for reconsideration.
14. Over two months later, on May 23, 2025, Wren called McCarthy and asked why it would be an issue for St. Jo Casino to advertise its restaurant at MWSU. He stated someone at the MGC had said it would be an issue referring to the email from Evans. He wanted to know what they could do to move forward with advertising the restaurant at MWSU. At no time before or during the conversation did Mr. Wren report that the casino had already advertised at MWSU. An email was sent later that afternoon to McCarthy which seemed to indicate that the casino already had a sponsorship agreement with MWSU. In response, MGC asked if the casino had a sponsorship agreement and the casino responded that it did and provided a copy of the agreement.
15. On May 27, 2025, Wren provided several emails regarding the sponsorship agreement and related communications. As of May 31, 2025, all contact with MWSU has been halted.

LAW

16. 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.

17. 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[.]

18. 11 CSR 45-5.053 states, in pertinent part, as follows:

(3) The holder of a Class A or B license is expressly prohibited from the following activities:

* * *

(C) Failing to conduct advertising and public relations activities in accordance with decency, dignity, good taste, and honest and fair representation;

18. 11 CSR 45-10.030 states, in pertinent part, as follows:

(1) Licensees shall promptly report to the commission any facts which the licensee has reasonable grounds to believe indicate a violation of law (other than minor traffic violations), minimum internal control standard requirements or commission rule committed by licensees, their employees or others, including, without limitation, the performance of licensed activities different from those permitted under their license.

VIOLATIONS

19. The acts or omissions of employees or agents of the Casino, as described above, resulted in a sponsorship agreement that was entered into which advertised gambling to an audience that included a significant number of students under the age of twenty-one (21). When the Casino was advised this would be considered a violation, its employees and agents failed to report the violation to the Commission in violation of 11 CSR 45-5.053(3)(C) and 11 CSR 45-10.030(1).
20. HGI – St. Jo, LLC, d/b/a St. Jo Frontier Casino is therefore subject to discipline for such violations pursuant to Sections 313.805 and 313.812.14(1) and (2), RSMo.

PENALTY PROPOSED

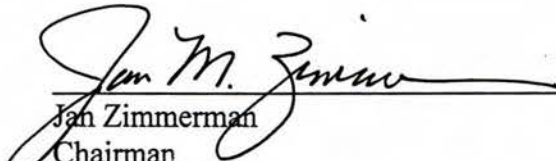
21. Under Section 313.805, RSMo, the Commission has the power to assess any appropriate administrative penalty against HGI – St. Jo, LLC as the holder of a Class B license.
22. THEREFORE, it is proposed that the Commission fine HGI – St. Jo, LLC, d/b/a St. Jo Frontier Casino the amount of ten thousand dollars (\$10,000.00) 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 January, 2026, to:

Donald Wren, General Manager
St. Jo Frontier Casino
777 Winners Circle
St. Joseph, MO 64505


Jan Zimmerman
Chairman
Missouri Gaming Commission