

MISSOURI GAMING COMMISSION
COMMISSION RESOLUTION NO. 26-032
REGARDING SETTLEMENT OF SPORTS WAGERING DISCIPLINE
PENN SPORTS INTERACTIVE, LLC

May 20, 2026

WHEREAS, the Missouri Gaming Commission issued proposed discipline against Penn Sports Interactive, LLC (“Licensee”) as the holder of a Mobile sports wagering license; and

WHEREAS, Licensee and the Commission have come to a settlement concerning the issues presented in the proposed discipline and Licensee shall pay a \$2,500 fine pursuant to the terms of the Settlement Agreement (a copy of which is attached hereto);

NOW, THEREFORE, BE IT RESOLVED, that the Commission hereby approves the Settlement Agreement concerning Penn Sports Interactive, LLC; and

BE IT FURTHER RESOLVED that this Settlement Agreement shall become effective upon the date of this resolution and be considered a final decision of the Missouri Gaming Commission.



Kevin Spaulding
Commissioner
Missouri Gaming Commission

day of the regular season. Any wagers after this deadline are not in the catalog of approved events and are therefore considered prohibited wagers. Based on the NFL schedule, the deadline was prior to 1:00 p.m. eastern time on January 4, 2026.

5. On January 6, 2026, Penn's compliance officer notified MGC that it had allowed wagering on NFL season award markets until 9:42 a.m. that day.

6. Penn's notification indicated that the markets had initially been turned off, but a trade team member had inadvertently reactivated the markets, which allowed continued wagering.

7. On January 7, 2026, Penn submitted a Compliance Incident Report which indicated that the markets had never been turned off. The report indicated that the trading team did not follow established guidance from the compliance team regarding the deadlines for wagering on the award markets. The report provided a different explanation than what had initially been explained to MGC.

8. During the time period after the 1:00 p.m. eastern deadline and until the markets were turned off, Penn accepted fourteen (14) wagers for a total of \$13,102.02.

9. On January 9, 2026, all affected wagers were voided by Penn.

10. On January 22, 2026, the Commission sent a Notice of Investigation to Penn outlining the violations in this matter.

11. On February 5, 2026, Penn acknowledged the Notice of Investigation, accepted responsibility for the errors, and outlined additional safeguards to prevent such occurrences in the future.

12. Penn acknowledges and understands that it has the right to consult counsel at its own expense.

13. Penn admits the facts alleged by the Commission and outlined in this Settlement

Agreement and further acknowledges that this agreement resolves the outstanding issues in this disciplinary action.

14. Penn acknowledges that the Missouri Gaming Commission has jurisdiction and authority to discipline its Mobile sports wagering license.

15. Penn has been advised that it has thirty (30) days to review the documentation provided and consider the proposed settlement offer.

16. Penn stipulates and agrees to waive any rights it may have to a hearing before the Administrative Hearing Commission or the Commission and any rights to seek judicial review or other challenge or contest of the terms and conditions of this Settlement Agreement and forever releases and holds harmless the Commission, and the Executive Director and his agents from all liability and claims arising out of, pertaining to, or relating to this matter.

17. The Missouri Gaming Commission stipulates and agrees to waive any rights it may have to a hearing before the Administrative Hearing Commission or the Commission and any rights to seek judicial review or other challenge or contest of the terms and conditions of this Settlement Agreement and forever releases and holds harmless Penn from all liability and claims arising out of, pertaining to, or relating to this matter. Such stipulation does not prevent investigation into future allegations against Penn should they arise.

18. Each signatory to this Settlement Agreement certifies by signing that he or she is fully authorized, in his or her own capacity, or by the named party he or she represents, to accept the terms and provisions of this Settlement Agreement in their entirety, and agrees, in his or her personal or representational capacity, to be bound by the terms of this Settlement Agreement.

19. The Commission is authorized to settle this matter and enter into this Consent Order in the public interest pursuant to §§ 536.060 and 621.045, RSMo.

Relevant Law

20. Article III, Section 39(g)9, provides, in relevant part, as follows:

Subject to and consistent with the terms of this section, the Commission shall have the power to adopt and enforce commercially reasonable rules, including emergency rules, to implement the provisions of this section. ... The Commission shall [adopt a regulatory framework] including, but not limited to:

* * *

k. Establishing fines, placing licensees on probation, and revoking licenses for violations of this section. The Commission may impose fines upon any person holding, or required to hold, a license or approval under this section or the rules subsequently adopted.

21. 11 CSR 45-20.150(1) states that licensees shall be subject to the imposition of fines, license probation, license suspension, license revocation, or other disciplinary action for any violation of Article III, Section 39(g) of the *Missouri Constitution*, law, or regulation.

22. 11 CSR 45-20.150(1)(Q) states that grounds for disciplinary action include facilitating, enabling, or participating in sports wagering other than in accordance with Article III, Section 39(g) of the *Missouri Constitution* and laws, rules, and regulations of this state or any other state or country.

23. 11 CSR 45-20.150(1)(F) states that grounds for disciplinary action also include misrepresenting any information to the Commission.

24. 11 CSR 45-20.340(1) states that Retail and Mobile licensees may only accept wagers on events approved by the Commission and published in the catalog of approved events.

25. 11 CSR 45-20.360(2)(E) states that Retail and Mobile licensees shall not allow wagering on any event or portion of an event, or wagering by type or form, which has not been approved by the Commission.

26. Penn acknowledges and understands that under Article III, Section 39(g) of the *Missouri Constitution* and 11 CSR 45-20, the Commission can discipline Penn's Mobile license for such actions that violate Article III, Section 39(g), 11 CSR 45-20.340, and 11 CSR 45-20.360 by permitting wagers both on events and in a manner not approved by the Commission and providing conflicting accounts of why such wagers were permitted by Penn.


ORDER

IT IS AGREED AND STIPULATED THAT as follows:

1. Penn Sports Interactive, LLC will pay a fine of \$2,500.00 made payable to the Missouri Gaming Commission within thirty (30) days of the Missouri Gaming Commission's approval of this Settlement Agreement; and
2. Penn Sports Interactive, LLC will agree to obey all laws, including, but not limited to those concerning the operation requirements for Mobile licensees, and will cooperate fully with the MGC in all investigations and inquiries into its wagering operations and license.

Dated:

04/23/2026



Michael A. Lera
Executive Director
Missouri Gaming Commission

CONSENT AND WAIVER OF HEARING

The undersigned persons understand and acknowledge that Penn Sports Interactive, LLC has the right to a hearing, but that it has waived this right and consents to the issuance of the Order in this Settlement Agreement.

Adam Kates
Penn Sports Interactive, LLC
By: Adam Kates
1818 Market Street, Floor 13
Philadelphia, PA 19103

4/22/2026
Date

Nikki D. Evans
Nikki D. Evans
General Counsel
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4/23/2026
Date

Michael A. Leara
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04/23/2026
Date