

# IN THE MISSOURI GAMING COMMISSION

In Re: )  
 ) DC-13-693  
Harrah's Maryland Heights, LLC )

## 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") is a state commission created under Chapter 313, RSMo 2000, with jurisdiction over gaming activities, including riverboat gambling activities, in the State of Missouri.
2. The Commission issued Harrah's Maryland Heights, LLC a Class A gaming license to develop and operate Class B gaming licenses in the State of Missouri.
3. Caesars Entertainment, Inc. was the parent organization or controlling entity of Harrah's Maryland Heights, LLC.
4. The Commission issued a Class B riverboat gambling license to Harrah's Maryland Heights, LLC ("Company"), to conduct games on and operate the excursion gambling boat known as Harrah's St. Louis Casino ("Casino").
5. As the holder of a Class B license, the Company is subject to the provisions of Sections 313.800 to 313.850, RSMo 2000, and the regulations promulgated thereunder by the Commission.

## STATEMENT OF FACTS<sup>1</sup>

6. On October 17, 2012, Sergeant C.W. Easley, assigned to the Gaming Division initiated an investigation in which Harrah's St. Louis Casino allowed certain patrons to receive complimentary drinks off the gaming floor from the Diamond Lounge, which is only accessible from the gaming floor and then take the drinks onto the gaming floor.

## LAW

7. Under Section 313.805(6), RSMo 2000, the Commission may assess any appropriate administrative penalty against a licensee, including but not limited to, suspension, revocation or penalties of an amount determined by the Commission.

---

<sup>1</sup> 20121018010

8. Under Section 313.812.14, RSMo 2000, a holder of any license is subject to imposition of penalties, suspension or revocation of such license for any act or failure to act by himself or his 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.
9. Under Section 313.812.14(1), RSMo 2000, a licensee may be disciplined for failing to comply with or make provisions 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.
10. Under Section 313.812.14(2), RSMo 2000, a licensee may be disciplined for failing to comply with any rule, order or ruling of the Commission or its agents pertaining to gaming.
11. Under 11 CSR 45-12.090(22), Complimentary Service of Intoxicating Liquor. An excursion liquor licensee shall not, through actions of his/her own or of an employee, supply any intoxicating liquor in any quantity whatsoever free of charge or as a complimentary to any person on the gaming floor of the premises.
12. Under 11 CSR 45-4.020(10) rules adopted prior to May 30, 2008 which previously referred to a Class A licensee shall refer to both a Class A and B licensee unless specifically identified otherwise.

### **VIOLATIONS**

13. The actions or omissions of employees or agents of the Company as described above constitute a failure of the Company to abide by the regulations not to provide complimentary service of intoxicating liquor on the gaming floor. The conduct alleged above violated 11 CSR 45-12.090(22), 11 CSR 45-4.020(10), Sections 313.805(6), 313.812.14, and 313.812.14(1) & (2) RSMo.

### **PENALTY PROPOSED**

14. Under Section 313.805(6), RSMo 2000, the Commission has the power to assess any appropriate administrative penalty against the Company, as the holder of a Class B license.
15. THEREFORE, it is proposed that the Commission fine Harrah's Maryland Heights, LLC the amount of \$10,000 for the violations set forth herein.

---

Dr. Barrett Hatches  
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 \_\_\_\_ day of \_\_\_\_\_, 2013, to:

Jennifer Tucker  
Attorney for Harrah's Maryland Heights  
Lathrop & Gage  
314 East High Street  
Jefferson City, MO 65101

---

Dr. Barrett Hatches  
Chairman  
Missouri Gaming Commission