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BEFORE THE MISSOURI GAMING COMMISSION  
3351 PERCY DRIVE  
CAPE GIRARDEAU, MISSOURI 63701

TRANSCRIPT OF HEARING

April 24, 2024

9:30 A.M.

*JAN ZIMMERMAN, Commission Chairman*  
*DAVID W. HANE, Commissioner*  
*PAT CONWAY, Commissioner*  
*KEVIN SPAULDING, Commissioner*  
*PEGGY D. RICHARDSON, Executive Director*

P R O C E E D I N G S

1  
2 CHAIRMAN ZIMMERMAN: Good morning and welcome to  
3 everyone here for the April meeting of the Missouri Gaming  
4 Commission. I'll call the April 24, 2024, Missouri Gaming  
5 Commission meeting to order.

6 Angie, would you please call the roll?

7 MS. FRANKS: Chairman Zimmerman?

8 CHAIRMAN ZIMMERMAN: Present.

9 MS. FRANKS: Commissioner Conway?

10 COMMISSIONER CONWAY: Present.

11 MS. FRANKS: Commissioner Hane?

12 COMMISSIONER HANE: Present.

13 MS. FRANKS: Commissioner Spaulding?

14 COMMISSIONER SPAULDING: Present.

15 CHAIRMAN ZIMMERMAN: We have a quorum, so let's get  
16 started.

17 The first item this morning is the Adoption of the  
18 Agenda. I move that we adopt today's agenda. Is there a  
19 second?

20 COMMISSIONER CONWAY: Second.

21 CHAIRMAN ZIMMERMAN: Any discussion? Seeing none,  
22 Angie would you call the roll?

23 MS. FRANKS: Chairman Zimmerman?

24 CHAIRMAN ZIMMERMAN: Approved.

25 MS. FRANKS: Commissioner Conway?

1 COMMISSIONER CONWAY: Approved.  
2 MS. FRANKS: Commissioner Hane?  
3 COMMISSIONER HANE: Approved.  
4 MS. FRANKS: Commissioner Spaulding?  
5 COMMISSIONER SPAULDING: Approved.  
6 MS. FRANKS: By your vote, you've adopted the agenda.  
7 CHAIRMAN ZIMMERMAN: The next item of business is  
8 Consideration of the Minutes from the March meeting. I move  
9 that the minutes of the March 27, 2024 meeting be approved.  
10 Is there a second?  
11 COMMISSIONER HANE: Second.  
12 CHAIRMAN ZIMMERMAN: Any discussion? Seeing none,  
13 Angie, would you call the roll?  
14 MS. FRANKS: Chairman Zimmerman?  
15 CHAIRMAN ZIMMERMAN: Approved.  
16 MS. FRANKS: Commissioner Conway?  
17 COMMISSIONER CONWAY: Approved.  
18 MS. FRANKS: Commissioner Hane?  
19 COMMISSIONER HANE: Approved.  
20 MS. FRANKS: Commissioner Spaulding?  
21 COMMISSIONER SPAULDING: Approved.  
22 MS. FRANKS: By your vote, you've adopted the minutes  
23 of the March 27, 2024 meeting.  
24 CHAIRMAN ZIMMERMAN: Next we have Consideration of  
25 Resolution 24-016, Licensure of Level I Key Applicants.

1 Sergeant Brian Holcomb will be making the presentation this  
2 morning. Welcome, Sergeant.

3 SERGEANT HOLCOMB: Thank you, Chairman Zimmerman. Good  
4 morning, Commissioners. Missouri State Highway Patrol  
5 Investigators and Missouri Gaming Commission Financial  
6 Analysts conducted comprehensive background investigations on  
7 Key and Level I Applicants. The investigations included, but  
8 were not limited to, criminal, financial, civil, and general  
9 character inquiries that were made in the jurisdictions where  
10 the applicants have lived, worked, and frequented.

11 The following applicants are being considered for your  
12 consideration:

13 Jean Ann Swope, Accounting Manager, St. Jo Frontier  
14 Casino.

15 Li Lynn Mah, Chief Financial Officer, Ainsworth Gaming  
16 Technology Limited.

17 Robert Barron Ziems, Chief Legal Officer and Corporate  
18 Secretary, Play AGS, Incorporated.

19 Investigative findings were provided to the Missouri  
20 Gaming Commission staff for their review, and investigators  
21 would be glad to answer any questions you might have.

22 CHAIRMAN ZIMMERMAN: Any questions for Sergeant  
23 Holcomb? See none, thank you, Sergeant.

24 CHAIRMAN ZIMMERMAN: I move to approve Resolution  
25 24-016. Is there a second?

1 COMMISSIONER SPAULDING: Second.

2 CHAIRMAN ZIMMERMAN: Any further discussion? Seeing  
3 none, Angie, would you call the roll?

4 MS. FRANKS: Chairman Zimmerman?

5 CHAIRMAN ZIMMERMAN: Approved.

6 MS. FRANKS: Commissioner Conway?

7 COMMISSIONER CONWAY: Approved.

8 MS. FRANKS: Commissioner Hane?

9 COMMISSIONER HANE: Approved.

10 MS. FRANKS: Commissioner Spaulding?

11 COMMISSIONER SPAULDING: Approved.

12 MS. FRANKS: By your vote, you've adopted Resolution  
13 Number 24-016.

14 CHAIRMAN ZIMMERMAN: Our next item of business is  
15 Consideration of Resolution 24-017, Relicensure of Key  
16 Persons. Corporal Don Doza will be making the presentation.

17 CORPORAL DOZA: Good morning, Ms. Chairman and  
18 Commissioners.

19 Missouri State Highway Patrol Investigators conducted  
20 background investigation updates on Key Person License  
21 renewals. The investigations included an application review  
22 as well as civil, criminal, and general character inquiries  
23 made in the jurisdictions where the applicants currently  
24 reside.

25 The following renewals are being presented for your

1 consideration:

2 Graeme John Campbell, Independent Non-Executive  
3 Director, Ainsworth Game Technology Ltd.

4 Maritza Del Carmen Landry, Managing Member, Casino  
5 Tech.

6 Richard James Landry, Managing Member, Casino Tech.

7 Jordon Louis Kruse, Indirect Owner and Director,  
8 Interblock d.o.o.

9 David Benjamin Quick, Indirect Owner and Director,  
10 Interblock d.o.o.

11 Robeson Mandela Reeves, CEO, Bally's Corporation.

12 Secil Tabli Watson, Director, Member of the Board,  
13 Everi Holdings, Incorporated.

14 Matthew Charles Wilson, Director, President, Interblock  
15 d.o.o.

16 Investigative findings were provided to the Missouri  
17 Gaming Commission Staff for their review, and I'd be glad to  
18 answer any questions you might have. Thank you.

19 CHAIRMAN ZIMMERMAN: Are there any questions for  
20 Corporal Doza? Seeing none, thank you, Corporal.

21 I move to approve Resolution 24-017. Is there a  
22 second?

23 COMMISSIONER CONWAY: Second.

24 CHAIRMAN ZIMMERMAN: Any further discussion? Seeing  
25 none, Angie, would you call the roll?

1 MS. FRANKS: Chairman Zimmerman?

2 CHAIRMAN ZIMMERMAN: Approved.

3 MS. FRANKS: Commissioner Conway?

4 COMMISSIONER CONWAY: Approved.

5 MS. FRANKS: Commissioner Hane?

6 COMMISSIONER HANE: Approved.

7 MS. FRANKS: Commissioner Spaulding?

8 COMMISSIONER SPAULDING: Approved.

9 MS. FRANKS: By your vote, you've adopted Resolution  
10 Number 24-017.

11 CHAIRMAN ZIMMERMAN: Our next item of business is  
12 Consideration of Relicensure of Certain Supplier Key Business  
13 Entities. Sergeant Sammy Seaton will be making both  
14 presentations, and we'll vote separately on each resolution.

15 SERGEANT SEATON: Good morning, Chairman Zimmerman and  
16 Commissioners.

17 On January 4, 2024, Licensed Supplier Company Ainsworth  
18 Game Technology, Incorporated and their parent company and key  
19 business entity license holder, Ainsworth Game Technology  
20 Limited, each submitted an application to the Missouri Gaming  
21 Commission seeking renewal of their current licenses which are  
22 set to expire on April 30, 2024.

23 Ainsworth is a global gaming company specializing in  
24 the design, development, manufacture, and marketing of  
25 casino-style gaming equipment, systems technology and game

1 content across multiple platforms to include land-based,  
2 online real money gambling, and social gaming.

3 Missouri State Highway Patrol Investigators and MGC  
4 Financial Analysts conducted renewal investigations which  
5 consisted of, but were not limited to, financial reviews,  
6 feedback from Missouri casino operators, jurisdictional  
7 inquiries, a review of disciplinary actions, litigation,  
8 business credit profiles, and a review of the key persons  
9 associated with the companies.

10 The results of these investigations were provided to  
11 the MGC staff for their review, and I would be happy to answer  
12 any questions you might have.

13 CHAIRMAN ZIMMERMAN: Are there any questions for  
14 Sergeant Seaton on Resolution 24-018? Seeing none, I move to  
15 approve Resolution 24-018. Is there a second?

16 COMMISSIONER Hane: Second.

17 CHAIRMAN ZIMMERMAN: Any further discussion? Angie,  
18 would you call the roll?

19 MS. FRANKS: Chairman Zimmerman?

20 CHAIRMAN ZIMMERMAN: Approved.

21 MS. FRANKS: Commissioner Conway?

22 COMMISSIONER CONWAY: Approved.

23 MS. FRANKS: Commissioner Hane?

24 COMMISSIONER HANE: Approved.

25 MS. FRANKS: Commissioner Spaulding?



1 COMMISSIONER SPAULDING: Approved.

2 MS. FRANKS: By your vote, you've adopted Resolution  
3 Number 24-018.

4 CHAIRMAN ZIMMERMAN: Are there any questions for  
5 Sergeant Seaton on 24-019? Seeing none, thank you, Sergeant.  
6 I move approval on Resolution 24-019. Is there a second?

7 COMMISSIONER SPAULDING: Second.

8 CHAIRMAN ZIMMERMAN: Any further discussion? Angie,  
9 would you call the roll?

10 MS. FRANKS: Chairman Zimmerman?

11 CHAIRMAN ZIMMERMAN: Approved.

12 MS. FRANKS: Commissioner Conway?

13 COMMISSIONER CONWAY: Approved.

14 MS. FRANKS: Commissioner Hane?

15 COMMISSIONER HANE: Approved.

16 MS. FRANKS: Commissioner Spaulding?

17 COMMISSIONER SPAULDING: Approved.

18 MS. FRANKS: By your vote, you've adopted Resolution  
19 Number 24-019.

20 CHAIRMAN ZIMMERMAN: Our next item of business is  
21 Consideration of Relicensure of Certain Supplier and Key  
22 Business Entities. Sergeant Seaton, you still have the floor.

23 SERGEANT SEATON: Thank you, Chairman.

24 On October 6, 2023, JFG Privatstiftung submitted an  
25 application to the Missouri Gaming Commission seeking a key

1 business entity license as the ultimate holding entity of the  
2 Novomatic group of companies. JFG is a private foundation  
3 formed under the Austrian Private Foundation Act and currently  
4 holds a 75.1 percent equity interest in the Novomatic group of  
5 companies which in turn holds a 52.9 percent interest in the  
6 Ainsworth group of companies.

7 Missouri State Highway Patrol Investigators and MGC  
8 Financial Analysts conducted an investigation of JFG which  
9 consisted of, but was not limited to, a financial review, a  
10 review of the foundation's structure and governing documents,  
11 current and future beneficiary entitlements, jurisdictional  
12 inquiries, litigation, and a review of the Key Person License  
13 Holders associated with the foundation.

14 Investigative findings were provided to the MGC Staff  
15 for their review, and I would be happy to answer any questions  
16 you might have.

17 CHAIRMAN ZIMMERMAN: Any questions for Sergeant Seaton?  
18 I'm glad you pronounced that name. I'd have had a tough time  
19 with it.

20 DIRECTOR RICHARDSON: Madam Chairman, just as a point  
21 of clarification, unless I heard you wrong, I think perhaps  
22 you said "relicensure" and this is initial licensure for this  
23 company.

24 CHAIRMAN ZIMMERMAN: Oh, I did. Thank you. Any  
25 questions for Sergeant Seaton? Seeing none, thank you

1 Sergeant.

2 I move to approve Resolution 24-020. Is there a  
3 second?

4 COMMISSIONER CONWAY: Second.

5 CHAIRMAN ZIMMERMAN: Any further discussion? Angie,  
6 would you call the roll?

7 MS. FRANKS: Chairman Zimmerman?

8 CHAIRMAN ZIMMERMAN: Approved.

9 MS. FRANKS: Commissioner Conway?

10 COMMISSIONER CONWAY: Approved.

11 MS. FRANKS: Commissioner Hane?

12 COMMISSIONER HANE: Approved.

13 MS. FRANKS: Commissioner Spaulding?

14 COMMISSIONER SPAULDING: Approved.

15 MS. FRANKS: By your vote, you've adopted Resolution  
16 Number 24-020.

17 CHAIRMAN ZIMMERMAN: Our next item of business is  
18 Consideration of Relicensure of Certain Supplier and Key  
19 Business Entities. Sergeant John Masters will be making the  
20 presentation. Sergeant, you have the floor.

21 SERGEANT MASTERS: Thank you. Good morning, Chairman  
22 and Commissioners.

23 Missouri State Highway Patrol Investigators and MGC  
24 Financial Analysts conducted the initial key business entity  
25 investigation of IB OCM VoteCo. VoteCo is a holding company

1 which holds 100 percent of the non-economic voting interest of  
2 Interblock d.o.o and Interblock USA, both of which currently  
3 hold an MGC supplier license.

4 This investigation consisted of a financial review,  
5 jurisdictional inquiries and a review of disciplinary actions,  
6 litigation, and three key people associated with IB OCM  
7 VoteCo.

8 The investigative findings were provided to the MGC  
9 Staff for their review, and investigators are available to  
10 answer any questions you might have. Thank you.

11 CHAIRMAN ZIMMERMAN: I think I did the same thing here.  
12 This is licensure and not relicensure on this one as well.  
13 Are there any questions for Sergeant Masters?

14 And I do want to thank the Staff for the detailed  
15 description that you all provided to us about VoteCo in  
16 preparation for the meeting. It was extremely helpful for me.

17 Any questions? Seeing none, I move approval of 24-021.  
18 Is there any further discussion? Is there a second?

19 COMMISSIONER HANE: Second.

20 CHAIRMAN ZIMMERMAN: Angie, would you call the roll?

21 MS. FRANKS: Chairman Zimmerman?

22 CHAIRMAN ZIMMERMAN: Approved.

23 MS. FRANKS: Commissioner Conway?

24 COMMISSIONER CONWAY: Approved.

25 MS. FRANKS: Commissioner Hane?

1 COMMISSIONER HANE: Approved.

2 MS. FRANKS: Commissioner Spaulding?

3 COMMISSIONER SPAULDING: Approved.

4 MS. FRANKS: By your vote, you've adopted Resolution  
5 Number 24-021.

6 CHAIRMAN ZIMMERMAN: Our next item of business is  
7 Consideration of Rescission of the Variance and Institutional  
8 Investor Waiver and Temporary Licensure of Certain Key  
9 Business Entities, Resolution 24-022. Executive Director  
10 Peggy Richardson and Sergeant John Masters will be making that  
11 presentation.

12 DIRECTOR RICHARDSON: Good morning, Madam Chairman and  
13 Commissioners.

14 Under Tab H is Staff's recommendation to rescind the  
15 Variance granted under Resolution 22-020 and the waiver of  
16 Licensure for Institutional Investor granted under Resolution  
17 Number 22-021.

18 The Commission granted that Variance and Waiver on  
19 April 27, 2022 to seven companies which are collectively  
20 referred to as the Oaktree Entities. A copy of those  
21 resolutions with the names of those entities were included in  
22 your Commission materials.

23 As you know, our rules allow for investor waiver of  
24 licensure up to 20 percent interest. In the Oaktree Org  
25 chart, all of these entities owned or controlled more than 20

1 percent of the company below it. The Commission agreed to  
2 grant a Variance to that 20 percent rule and then granted the  
3 Investor waiver for these companies. This had not been done  
4 before on this scale, but we agreed to give it a try.

5 For the past two years, I have spent countless hours  
6 researching rules and talking to regulators from other states.  
7 After much discussion with Staff, we concluded that the rules  
8 that we presently have in place are best for the State of  
9 Missouri. Attorney Rob Cantwell represents the Oaktree  
10 Entities. Last fall I sat down with him and advised him that  
11 the MGC Staff would be seeking rescission of the Variance and  
12 the waiver at this April meeting.

13 Ultimately, instead of seven, we identified ten  
14 entities that require licensure under our rules. We sent that  
15 list to Mr. Cantwell, he got right on it, and I am pleased to  
16 report that we have received applications for all ten  
17 companies.

18 What Staff is recommending at this time is that the  
19 Variance granted in Resolution Number 22-020 and the Investor  
20 waiver granted in Resolution Number 22-021 be rescinded. In  
21 addition, because all ten applications have now been received  
22 and are in the process of background investigation, Staff  
23 recommends that the Commission grant a Temporary Key Business  
24 Entity license to each of the following entities.

25 And I confess that when I prepared to read this list, I

1 felt the pain of Corporal Doza and all of those who have to  
2 read lists regularly.

3 1. Oaktree Special Situations Fund II, L.P. (Fund II),  
4 Cayman Islands

5 2. Oaktree Special Situations Fund II (Cayman)  
6 Holdings, L.P., Cayman Islands

7 3. OCM SSF II 1B Holdings, L.P., Cayman Islands

8 4. OCM Luxembourg SSF II, S.a.r.l.

9 5. OCM Luxembourg Baccarat Holdco S.a.r.l.

10 6. OCM Luxembourg Baccarat Midco S.a.r.l.

11 7. OCM Luxembourg Baccarat Bidco S.a.r.l.

12 8. Oaktree Special Situations Fund II, GP, LP

13 9. Oaktree Fund GP, LLC

14 10. Oaktree Fund GP 1A, Ltd.

15 If you grant the Temporary Key Business Entity licenses  
16 today, they will be presented for full licensure in April of  
17 2025 in order to make them come due at the same time as  
18 Interblock and Interblock USA, the licensed suppliers to which  
19 they are associated.

20 In addition, Mr. Cantwell is here today. I want to  
21 thank Mr. Cantwell for answering the many, many questions and  
22 supplying the many documents requested by myself and the  
23 investigators as we worked through this two-year process. I'm  
24 happy to try to answer any questions that you might have.

25 CHAIRMAN ZIMMERMAN: I don't have any questions.

1 Again, my thanks for helping us understand this all along and  
2 in preparation for this meeting as well. I don't have any  
3 questions for Director Richardson. Anyone have any questions?

4 Seeing none, I move to approve Resolution 24-022. Is  
5 there a second?

6 COMMISSIONER SPAULDING: Second.

7 CHAIRMAN ZIMMERMAN: Any further discussion? Angie,  
8 would you call the roll?

9 MS. FRANKS: Chairman Zimmerman?

10 CHAIRMAN ZIMMERMAN: Approved.

11 MS. FRANKS: Commissioner Conway?

12 COMMISSIONER CONWAY: Approved.

13 MS. FRANKS: Commissioner Hane?

14 COMMISSIONER HANE: Approved.

15 MS. FRANKS: Commissioner Spaulding?

16 COMMISSIONER SPAULDING: Approved.

17 MS. FRANKS: By your vote, you've adopted Resolution  
18 Number 24-022.

19 CHAIRMAN ZIMMERMAN: Are there any questions with  
20 regard to Resolution 24-023, the Temporary Licensure? Seeing  
21 none, is there a second?

22 COMMISSIONER SPAULDING: Second.

23 CHAIRMAN ZIMMERMAN: I apologize, I did that in reverse  
24 order. I move to approve Resolution 24-023, second from  
25 Kevin. Is there any further discussion? Angie, would you



1 call the roll?

2 MS. FRANKS: Chairman Zimmerman?

3 CHAIRMAN ZIMMERMAN: Approved.

4 MS. FRANKS: Commissioner Conway?

5 COMMISSIONER CONWAY: Approved.

6 MS. FRANKS: Commissioner Hane?

7 COMMISSIONER HANE: Approved.

8 MS. FRANKS: Commissioner Spaulding?

9 COMMISSIONER SPAULDING: Approved.

10 MS. FRANKS: By your vote, you've adopted Resolution  
11 Number 24-023.

12 CHAIRMAN ZIMMERMAN: Next item on our agenda is  
13 Consideration of Disciplinary Action DC 24-038, St. Louis  
14 Gaming Ventures, and DC 24-039, VICI Properties. General  
15 Counsel Heather Richenberger will be making those  
16 presentations, but we'll vote separately.

17 MS. RICHENBERGER: Thank you. Good morning, Chairman  
18 and Commissioners.

19 Under Tab I is the Preliminary Order of Discipline  
20 directed at St. Louis Gaming Ventures doing business as  
21 Hollywood Casino St. Louis.

22 This discipline is the result of a repeat MGC audit  
23 finding of which the casino failed to resolve. The  
24 Preliminary Order of Discipline alleges violations of the  
25 Missouri Statutes, Sections 447.536 and 447.539, which require

1 the casino to keep track of abandoned property and turn over  
2 that property to the Missouri Treasurer's Office every five  
3 years, to be received by November 1 for the time period of  
4 five years as of June 13th preceding.

5 The Order also alleges violations of the Missouri  
6 Gaming Commission's Minimum Control Standards, the MICS,  
7 specifically Chapter H, Section 14.06, which requires  
8 compliance with the Missouri abandoned property statutes and  
9 sets forth basic procedure for ensuring compliance.

10 The facts surrounding the violations resulting in this  
11 recommended discipline are as follows:

12 MGC auditors completed a compliance audit of Hollywood  
13 Casino for the period of August 1, 2019 through June 30 of  
14 2022. The findings found in that audit were discussed in a  
15 formal exit conference with casino management on November 15  
16 of 2022, and the final audit report was issued on December 15  
17 of 2022.

18 In May and June of 2023, MGC auditors conducted a  
19 follow-up on those findings. One significant finding had not  
20 been resolved. That significant finding was that unclaimed  
21 property funds, specifically unredeemed tickets or TITOs were  
22 not being timely escheated to the Missouri State Treasurer's  
23 office.

24 The original finding noted that on December 20 of 2021,  
25 when the casino issued a check to the Missouri State

1 Treasurer's Office for unclaimed tickets that were dated  
2 November 6 of 2012 through August 15 of 2015, those -- the  
3 2012 unredeemed tickets should have been turned over as  
4 abandoned property to the state by November 1 of 2017.  
5 The tickets from 2013 through 2015 were also years late in  
6 being escheated to the State Treasurer's Office.

7 The original finding also noted that through a review  
8 of the casino's unredeemed voucher reports, that the casino  
9 had unredeemed tickets from September 9, 2015 through June 30  
10 of 2016, that those were also due to be escheated in 2021 but  
11 had not been.

12 During a follow-up to this original audit finding, it  
13 was noted that the casino escheated unredeemed tickets from  
14 January 1, 2017 through June 30, 2017 on May 23, 2023;  
15 however, these tickets should have been escheated by  
16 November 1 of 2022.

17 It should also be noted that an Audit Report Number  
18 19-25 that was issued on December 31 of 2019, it also noted  
19 the casino's failure to timely issue unredeemed tickets.

20 The MGC's Disciplinary Review Board is recommending a  
21 fine in the amount of \$5,000 for these repeat violations. In  
22 response, the casino has indicated they do not contest the  
23 fine. Hollywood has stated it takes the matter seriously and  
24 has implemented procedures to improve its unclaimed property  
25 process. Hollywood advised that it now has a process whereby

1 unredeemed tickets are escheated to the state on an annual  
2 basis in order to ensure full compliance.

3 I'm happy to answer any questions you may have.

4 CHAIRMAN ZIMMERMAN: Ms. Richenberger, you referred to  
5 processes now in place to make sure that those tickets are  
6 escheated annually. Did the casino discuss what those  
7 processes actually are? Is it just keeping a closer eye on --  
8 some of them were years late, obviously.

9 MS. RICHENBERGER: Specifically, as indicated, they are  
10 doing this on an annual basis in order to ensure full  
11 compliance. It's only due every five years, but they're  
12 ensuring that it's annually done to be ahead of that.

13 CHAIRMAN ZIMMERMAN: Are there other questions for  
14 Ms. Richenberger? I know you had some questions about the  
15 escheating.

16 COMMISSIONER CONWAY: I guess just the process. So if  
17 there is a voucher that is past five years and the casino  
18 sends it to the treasurer, does that absolve them of any  
19 further liability to cash in that ticket?

20 MS. RICHENBERGER: My understanding, after talking to  
21 our Compliance Audit Manager, is that the casino at the time  
22 it's escheated to the treasurer's office, at that time they  
23 have two options. They could refer them to the treasurer's  
24 office at that time, or some casinos go ahead and pay the  
25 unredeemed ticket just as a customer service. Does that

1 answer your question?

2 COMMISSIONER CONWAY: Yeah, I believe so. I knew there  
3 was some type of expiration in effect when those transactions  
4 fail to take place, but I assume that this portion of the  
5 audit will become more and more important as we move to an  
6 increased number of vouchers that aren't cashed in on the  
7 floor. Just I imagine when the regulations were written,  
8 there were not nearly as many vouchers as there are available  
9 today.

10 MS. RICHENBERGER: That may very well be.

11 CHAIRMAN ZIMMERMAN: Are there any additional questions  
12 for Ms. Richenberger? Seeing none, thank you. I move to  
13 approve DC 24-038. Is there a second?

14 COMMISSIONER CONWAY: Second.

15 CHAIRMAN ZIMMERMAN: Any further discussion? Angie,  
16 would you call the roll?

17 MS. FRANKS: Chairman Zimmerman?

18 CHAIRMAN ZIMMERMAN: Approved.

19 MS. FRANKS: Commissioner Conway?

20 COMMISSIONER CONWAY: Approved.

21 MS. FRANKS: Commissioner Hane?

22 COMMISSIONER HANE: Approved.

23 MS. FRANKS: Commissioner Spaulding?

24 COMMISSIONER SPAULDING: Approved.

25 MS. FRANKS: By your vote, you've adopted DC-24-038.

1 CHAIRMAN ZIMMERMAN: The next item on our agenda is  
2 Consideration of Disciplinary Action DC-24-039.

3 Ms. Richenberger, you still have the floor.

4 MS. RICHENBERGER: Thank you.

5 Under Tab J is the Preliminary Order of Discipline  
6 directed at VICI Properties, Inc. VICI is a Key Business  
7 Entity. This discipline involves VICI's activities in  
8 licensing its key persons, specifically VICI's Chairman of the  
9 Board, Mr. James Abrahamson, VICI's Outside Director and Audit  
10 Committee Member, Mr. Craig MacNab, and VICI's Chief Executive  
11 Officer and Member of the Board of Directors, Mr. Edward  
12 Pitoniak.

13 The Preliminary Order of Discipline alleges violations  
14 of the Code of State Regulations, specifically Chapter 45  
15 Section 4.390, which requires the key persons file for license  
16 renewal at least 60 days before the first day of the month of  
17 its expiration.

18 Mr. Abrahamson, Mr. MacNab, and Mr. Pitoniak were  
19 initially licensed on September 27 of 2017. In 2021 their  
20 renewals were due on July 3 of 2021. When all three  
21 applications were not timely received, MGC staff began  
22 communications with VICI. The renewal applications were  
23 received from VICI on August 24, 2021, and the key person  
24 licenses were renewed at the Commission meeting on  
25 September 29 of 2021.

1           In 2023, renewal applications for Mr. Abrahamson,  
2 Mr. MacNab, and Mr. Pitoniak were due to the Commission Staff  
3 on July 3 of 2023, as their licenses were set to expire on  
4 September 30, 2023. On April 11, 2023, MGC staff e-mailed a  
5 reminder email to VICI's general counsel, Elena Keil,  
6 detailing the requirements for relicensing of VICI's  
7 employees.

8           On April 11, 2023 -- excuse me, on July 26, 2023 and  
9 again on September 1, 2023, MGC's Licensing Manager contacted  
10 Ms. Keil advising the renewal applications for the three key  
11 persons were due and had not been received.

12           On September 1 of 2023, Ms. Keil responded to MGC's  
13 email. Discussions between Ms. Keil and MGC occurred, and MGC  
14 explained the requirement for paper copies of applications in  
15 addition to electronic versions. Ms. Keil acknowledged she  
16 should have known the requirement and that she would overnight  
17 the documents to MGC.

18           On September 6 of 2023, MGC still had not received all  
19 the documents for the key persons; rather, MGC received one  
20 USB drive with all three key person applications. In  
21 response, MGC advised it was willing to accept a USB drive but  
22 that a separate USB for each applicant would be required.

23           Moreover, MGC advised that the key persons applications  
24 on those USB drives were incomplete because they were missing  
25 required documents.

1 MGC Staff advised VICI's General Counsel Keil that the  
2 time was of the essence in submitting these key person  
3 applications and documents and further provided to Keil a  
4 document outlining the missing documents for each applicant.  
5 MGC advised Keil that if the documents were not received  
6 within the next few days, it was possible that VICI's three  
7 key persons' licenses would not be renewed.

8 On September 11, 2023, Keil advised she had all of the  
9 requested documents except tax transcripts and that those  
10 documents would be sent priority mail on September 13. On  
11 September 14, MGC advised Keil the package had not been  
12 received. Keil responded the package had not gone out.

13 On September 18, 2023, the documents were received by  
14 MGC; however, the tax transcripts for all three key persons  
15 were still outstanding. As a result of the tardiness in  
16 submitting the renewal applications and the required  
17 documentation, MGC's Executive Director requested that this  
18 Commission grant a 60-day extension for the licenses of VICI's  
19 three key persons. Ultimately, the licenses for the three key  
20 persons were renewed by the Commission on October 25, 2023.

21 In summary, VICI and its three key persons, Abrahamson  
22 MacNab and Pitoniak, had a duty to submit their renewal  
23 applications on or before July 3 of 2023 as required by 11 CSR  
24 45-4.390(1). Moreover, their applications weren't received  
25 prior to the expiration of their licenses. This necessitated



1 an extension of their license to prevent them from lapsing.

2 The Commission's Disciplinary Review Board is  
3 recommending a \$10,000 fine for the violations by VICI. When  
4 VICI was notified of this pending disciplinary action, they  
5 have not contested the fine. They have acknowledged their  
6 tardiness and deficiency and advised that VICI has improved  
7 its renewal application process and has implemented enhanced  
8 processes, including additional executive-level oversight to  
9 ensure compliance with all future submissions.

10 I'm happy to answer any questions you might have about  
11 this discipline.

12 CHAIRMAN ZIMMERMAN: I don't have a question, just a  
13 comment and, you know, maybe my thanks to the Staff for being  
14 incredibly helpful and understanding and even granting a  
15 60-day extension. It's certainly not the Staff's  
16 responsibility to remind licensees to file their renewals, so  
17 again, my thanks to the Staff for being diligent and  
18 persistent; but again, not our job, so I absolutely agree with  
19 the fine.

20 Are there any other questions for Ms. Richenberger?

21 COMMISSIONER CONWAY: Yes. In the delinquency in 2021  
22 where the same situation occurred, was there disciplinary  
23 action in the type of a fine issued to them for their original  
24 delinquency in establishing these licenses?

25 MS. RICHENBERGER: I don't believe so. There was no

1 disciplinary action taken at that time, that's correct.

2 COMMISSIONER CONWAY: So they just got a warning or  
3 a --

4 COMMISSIONER HANE: Just a letter?

5 MS. RICHENBERGER: Yes, that's correct. They were made  
6 aware of the delinquency or tardiness, but there was no  
7 disciplinary action taken, that's correct.

8 COMMISSIONER CONWAY: And prior to this one and between  
9 the 2021, was there any instances of them being delinquent in  
10 establishing license for their key personnel?

11 DIRECTOR RICHARDSON: I don't believe so.

12 MS. RICHENBERGER: We don't believe that that was the  
13 case. We're not aware of that offhand. I mean I can look  
14 into that further if that would be helpful in making a  
15 decision.

16 COMMISSIONER CONWAY: well, I see what the Disciplinary  
17 Review Board did, and I'm just wanting to make sure that fine  
18 was significant enough to ensure that a message is sent that  
19 these applications need to be filed on a timely basis.

20 CHAIRMAN ZIMMERMAN: Ms. Richenberger or perhaps  
21 Director Richardson, was it the same type of circumstance in  
22 2021 where extensions were granted? I mean was it as  
23 difficult in '21, I guess is my question, as it was this time?

24 MS. RICHENBERGER: I do have the Deputy Director of  
25 Enforcement here, Terri Hutchison, that might be able to

1 provide further details.

2 MS. HUTCHISON: Terri Hutchison, Assistant Director of  
3 Enforcement. In 2021, I did look to see. They were able to  
4 get all of the information to us prior to their relicensure.

5 CHAIRMAN ZIMMERMAN: So it wasn't as egregious as this  
6 one?

7 MS. HUTCHISON: It was not as egregious as this one,  
8 no.

9 COMMISSIONER CONWAY: Okay.

10 CHAIRMAN ZIMMERMAN: Any other questions for  
11 Ms. Richenberger? Seeing none, I move to approve DC-24-039.  
12 Is there a second?

13 COMMISSIONER HANE: Second.

14 CHAIRMAN ZIMMERMAN: Any further discussion? Angie,  
15 would you call the roll?

16 MS. FRANKS: Chairman Zimmerman?

17 CHAIRMAN ZIMMERMAN: Approved.

18 MS. FRANKS: Commissioner Conway?

19 COMMISSIONER CONWAY: Approved.

20 MS. FRANKS: Commissioner Hane?

21 COMMISSIONER HANE: Approved.

22 MS. FRANKS: Commissioner Spaulding?

23 COMMISSIONER SPAULDING: Approved.

24 MS. FRANKS: By your vote, you've adopted DC-24-039.

25 CHAIRMAN ZIMMERMAN: We're now ready to close our first

1 open session. I move for closed meeting under Section  
2 313.847, RSMo., Investigatory, Proprietary and Application  
3 Records and 610.021(1), RSMo., Legal Actions and Matters  
4 Subject to Attorney Client Privilege and Legal Work Product,  
5 (3) and (13) Personnel, (12) Contracts and (14) Records  
6 Protected from Disclosure by Law. Is there a second?

7 COMMISSIONER SPAULDING: Second.

8 CHAIRMAN ZIMMERMAN: Any further discussion? Angie,  
9 would you call the roll?

10 MS. FRANKS: Chairman Zimmerman?

11 CHAIRMAN ZIMMERMAN: Approved.

12 MS. FRANKS: Commissioner Conway?

13 COMMISSIONER CONWAY: Approved.

14 MS. FRANKS: Commissioner Hane?

15 COMMISSIONER HANE: Approved.

16 MS. FRANKS: Commissioner Spaulding?

17 COMMISSIONER SPAULDING: Approved.

18 MS. FRANKS: We're now in closed session.

19 CHAIRMAN ZIMMERMAN: Thank you everybody.

20 [THAT CONCLUDES THE RECORD]

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REPORTER'S CERTIFICATE

I, Susanne E. Moon, Registered Professional Reporter, Certified Real-time Reporter, and Certified Court Reporter, certify that on April 24, 2024, I was present and reported the proceedings held before the Missouri Gaming Commission, and I further certify that the foregoing 28 pages contain a true and accurate transcription of the proceedings.

Susanne Moon  
Susanne E. Moon, RPR, CRR, CCR #473

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**MISSOURI GAMING COMMISSION**  
**Second Open Session Minutes**  
**April 24, 2024**

The Missouri Gaming Commission (the “Commission”) went into the second open session at approximately 10:15 a.m. on April 24, 2024, at the Dogwood Room, Drury Plaza Hotel, 3351 Percy Drive, Cape Girardeau, Missouri.

**Chairman Zimmerman moved to adjourn the second open session. Commissioner Hane seconded the motion, and after a roll call vote was taken, Zimmerman – yes, Conway – yes, Hane – yes, and Spaulding – yes.**

The meeting ended at 10:41 a.m.