

IN THE MISSOURI GAMING COMMISSION

In Re:)
) DC-25-025
The United States Playing Card Company)

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, 2000, with jurisdiction over gaming activities, including riverboat gambling activities, in the State of Missouri.
2. The United States Playing Card Company (the “Company”) is a supplier of gaming equipment.
3. The Commission issued a Supplier license to the Company to provide playing cards to Class B licensees.
4. As the holder of a Supplier license, the Company is subject to the provisions of §§ 313.800 to 313.850, RSMo, and the regulations promulgated thereunder by the Commission.

STATEMENT OF FACTS¹

5. From June 2024 through September 2024, there were five (5) gaming reports which documented several manufacturing defects on table game playing cards shipped to various Class B licensees by The United States Playing Card Company.
6. On June 20, 2024, Trooper Taggart Holston of the Missouri State Highway Patrol, assigned to the Gaming Division, initiated a regulatory investigation at Horseshoe Casino St. Louis after it was discovered that four six of spades cards from four separate blue decks of cards manufactured by the Company each had a large yellow circle on the back, necessitating the removal of the decks prior to them being put into play.
7. On June 27, 2024, Trooper Charles Karr of the Missouri State Highway Patrol, assigned to the Gaming Division, initiated a regulatory investigation at Bally’s Kansas City Casino after it was discovered that several cards in a single blue deck were miscut. The cards were removed from play after a patron notified the dealer of the defect.
8. On August 1, 2024, Trooper William Fair of the Missouri State Highway Patrol, assigned to the Gaming Division, initiated a regulatory investigation at Ameristar

¹ 20240623002, 20240708003, 20240806002, 20240818003, 20240901002

Casino Kansas City after it was discovered that an entire orange deck of cards had printed cut lines on the fronts and backs of the cards which necessitated removal of the deck prior to being placed into play.

9. On August 18, 2024, Trooper Curtis Schilling of the Missouri State Highway Patrol, assigned to the Gaming Division, initiated a regulatory investigation at Hollywood Casino St. Louis after a poker dealer discovered that the deck in use at the poker table was missing the four of spades and had a duplicate jack of spades. Further review into the incident revealed that the defective deck had been part of a shipment in which seven total defects were discovered. The defects included marks on the backs of various cards, missing cards, and duplicate cards in decks.
10. On September 1, 2024, Corporal Daniel Wohler of the Missouri State Highway Patrol, assigned to the Gaming Division, initiated a regulatory investigation at Ameristar Casino Kansas City after a table games employee discovered ten (10) defective cards within seven (7) different decks. The cards in question each had a black mark on the back.
11. The Company's failure to ensure accuracy in its manufacturing is in violation of 11 CSR 45-5.183.

LAW

12. 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.

13. 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[.]

14. Title 11 CSR 45-5.183 states, in pertinent part, as follows:

(1) Unless otherwise approved by the commission, all cards used for gambling games must meet the following specifications:

(A) Cards used to play table games and poker shall be in standard decks of fifty-two (52) cards each with each card identical in size and shape to every other card in such deck or as otherwise approved by the commission;

* * *

(D) The backs of each card in the deck shall be identical and no card shall contain any marking, symbol, or design that will enable a person to know the identity of any element printed on the face of the card or that will in any way differentiate the back of that card from any other card in the deck[.]


VIOLATIONS

15. The actions or omissions of employees or agents of the Company as described above constitute the shipping of defective playing cards to Class B licencees, which is a violation of 11 CSR 45-5.183.

16. The Company is therefore subject to discipline for such violations under §§ 313.805(5), (6), and (19) and 313.812.14 (1) and (2), RSMo.

PENALTY PROPOSED

17. Under Section 313.805, RSMo, the Commission has the power to assess any appropriate administrative penalty against the Company, as the holder of a Supplier license.
18. THEREFORE, it is proposed that the Commission fine The United States Playing Card Company the amount of fifteen thousand dollars (\$15,000.00) for the violations set forth herein.




Jan M. 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 27th day of March, 2025 to:

Stephanie Krummert, Casino Compliance
and Senior Account Manager
The United States Playing Card Company
300 Gap Way
Erlanger, KY 41018



Jan M. Zimmerman
Chairman
Missouri Gaming Commission