

# IN THE MISSOURI GAMING COMMISSION

In Re: )  
 ) DC-25-108  
St. Louis Gaming Ventures, LLC )  
d/b/a Hollywood Casino St. Louis )

## **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 PENN Entertainment, Inc. to develop and operate Class B gaming licensees in the State of Missouri.
3. PENN Entertainment is the parent organization or controlling entity of St. Louis Gaming Ventures, LLC.
4. The Commission issued a Class B riverboat gambling license to St. Louis Gaming Ventures, LLC, to conduct games on and operate the excursion gambling boat known as Hollywood Casino St. Louis (the “Casino”).
5. As the holder of a Class B license, St. Louis Gaming Ventures, LLC, d/b/a Hollywood Casino St. Louis, is subject to the provisions of Sections 313.800 to 313.850, RSMo, and the regulations promulgated thereunder by the Commission.

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

6. On April 26, 2025, at 11:17 p.m., Corporal Thomas Belote (“Cpl. Belote”) overheard radio traffic of two juveniles possibly on the gaming floor at the Phat Thai restaurant. He responded and contacted Natasha Boekholt and David Boekholt and their two children, a 12-year-old male and a 15-year-old female, at a dining table.
7. Mr. Boekholt stated that they were attempting to eat at Phat Thai because the other restaurants were closed. He further stated that an employee at the 99 Hops House (off the gaming floor) told them it was permitted to bring their children on the gaming floor if they were just attempting to eat at Phat Thai and did not intend to gamble. Cpl. Belote explained that anyone under twenty-one (21) years of age was not permitted to enter the gaming floor in Missouri and the family was escorted out.

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<sup>1</sup> GR 20250426002

8. A review of surveillance footage showed that Security Officer Jaborie Tabb ("Tabb") was assigned to the Rodeo Turnstile at the time of this incident. Surveillance further showed the Boekholts enter the gaming floor at 11:11 p.m., through the Rodeo Turnstile, without having their identifications checked by Tabb.
9. Surveillance review showed that Tabb appeared overwhelmed with the amount of people in line attempting to enter the gaming floor at the turnstiles while trying to maintain control of the crowd.
10. As a result of the crowd size and the inadequate placement of the security podium, Tabb was unable to ensure that the two minors in question did not enter the gaming floor. Once on the gaming floor, the Boekholts went directly to a table at the Phat Thai restaurant. At 11:23 p.m., the Boekholts were escorted off the gaming floor.
11. Prior to this incident, Cpl. Belote was on scene at the Rodeo Turnstile and observed that Tabb was the only Casino employee attempting to check multiple identifications while also trying to control a large crowd in the turnstile area.

#### **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;

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(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 45-9.060 states, in pertinent part, as follows:

(2) Failure to comply with the provisions of this chapter is an unsuitable method of operation.

(3) Violations of the minimum internal control standards [“(MICS”)”] by a Class A or Class B licensee or an agent or employee of a Class A or Class B licensee are deemed to be unsuitable conduct for which the Class A or Class B licensee and/or its agent or employee is subject to administrative penalty pursuant to section 313.805(6), RSMo and 11 CSR 45-1 et seq., as amended from time-to-time. Any agent or employee of a Class A or Class B licensee that is involved in a violation of the minimum internal control standards may be subject to fine, discipline, or license revocation.

(4) Violations of the Class B licensee's control system by a Class A or Class B licensee or an agent or employee of the Class A or Class B licensee shall be prima facie evidence of unsuitable conduct for which the Class A or Class B licensee and/or its agents or employees may be subject to discipline pursuant to section 313.805(6), RSMo and 11 CSR 45-1 et seq., as amended from time-to-time.

15. The Commission's MICS and the Casino's ICS, Chapter N § 4.01 states, in pertinent part, as follows:

Persons under 21 years of age shall not be permitted access to the casino floor or be allowed to place a wager.

16. The Commission's MICS and the Casino's ICS, Chapter N § 4.04 states, in pertinent part, as follows:


The enforcement of admission and gambling restrictions for persons under 21 years of age shall include, at a minimum, checking their government-issued photo identification.

### **VIOLATIONS**

17. The acts or omissions of employees or agents of the Casino, as described above, constitute a failure of the Casino to provide the resources necessary for its employees to properly perform their job duties, resulting in two minors accessing the gaming floor in violation of the Commission's MICS and Casino's ICS, Chapter N, §§ 4.01 and 4.04.
18. St. Louis Gaming Ventures, LLC, d/b/a Hollywood Casino St. Louis, is therefore subject to discipline for such violations pursuant to Sections 313.805 and 313.812.14(2), RSMo, and 11 CSR 45-9.060(2) and (3).

### **PENALTY PROPOSED**

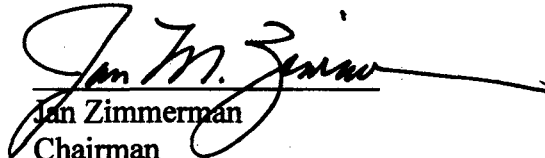
19. Under Section 313.805, RSMo, the Commission has the power to assess any appropriate administrative penalty against St. Louis Gaming Ventures, LLC, as the holder of a Class B license.
20. THEREFORE, it is proposed that the Commission fine St. Louis Gaming Ventures, LLC, d/b/a Hollywood Casino St. Louis, 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 4<sup>th</sup> day of December, 2025, to:

Michael Jerlecki, GM  
Hollywood Casino St. Louis  
777 Casino Center Drive  
Maryland Heights, MO 63043

  
Jan Zimmerman  
Chairman  
Missouri Gaming Commission