

MISSOURI GAMING COMMISSION

COMMISSION RESOLUTION NO. 26-063
REGARDING SETTLEMENT OF SPORTS WAGERING DISCIPLINE
BETMGM, LLC D/B/A BETMGM

August 26, 2026

WHEREAS, the Missouri Gaming Commission issued proposed discipline against BetMGM, LLC d/b/a BetMGM ("Licensee") as the holder of a Mobile sports wagering license (Gaming Report No. 20260310002); and

WHEREAS, Licensee and the Commission have come to a settlement concerning the issues presented in the proposed discipline and Licensee shall pay a \$15,000 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 BetMGM, LLC d/b/a BetMGM; 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.


Roger Stottlemire
Commissioner
Missouri Gaming Commission

IN THE MISSOURI GAMING COMMISSION

In RE: BetMGM, LLC d/b/a)
BetMGM) **No. _____**
)
License Number: MGC341252)

SETTLEMENT AGREEMENT

The Missouri Gaming Commission takes up the above matter for consideration and disposition. The Missouri Gaming Commission ("MGC" or "Commission"), by Director Michael A. Leara, and BetMGM, LLC d/b/a BetMGM ("BetMGM" or "Licensee"), by and through counsel, have reached a settlement in this matter and have consented to the issuance of this Settlement Agreement.

Findings of Fact

1. The Missouri Gaming Commission is a state commission created under Chapter 313, RSMo (2016)¹, with jurisdiction over gaming activities in the state of Missouri. Article III, Section 39(g) of the *Missouri Constitution* delegated authority to the Commission to regulate sports wagering in the state of Missouri.
2. The Commission issued a Mobile license to BetMGM, LLC d/b/a BetMGM to conduct mobile sports wagering activities in the state.
3. As the holder of a Mobile license, Licensee is subject to the provisions of Article III, Section 39(g) of the *Missouri Constitution* and the regulations promulgated thereunder by the Commission.
4. Article III, Section 39(g) of the *Missouri Constitution* authorized the Missouri Gaming Commission to establish a start date for sports wagering no later than December 1, 2025,

¹ All statutory references are to RSMo (2016) unless otherwise specified.

with no wagering allowed to be offered before such start date established by the Commission. Missouri's launch date was set for midnight on December 1, 2025. As such, no wagering was permitted to be offered in the state prior to that date.

5. On October 31, 2025, BetMGM notified MGC staff regarding an incident on its platform that allowed patrons in Missouri to place wagers even though they were outside of the permissible geographic area.

6. After further investigation, BetMGM determined that a Boolean flag was improperly set to false in its system, which allowed Missouri patrons to place wagers that were accepted in other jurisdictions, including Kansas, Iowa, Illinois, Maryland, Pennsylvania, Virginia, Mississippi, and Arizona.

7. The wagers in question were accepted from 6:04 a.m. eastern time on October 21, 2025, through 8:31 p.m. eastern time on October 23, 2025. In total, there were 236 wagers from 87 unique patrons for a handle of \$16,175.18.

8. BetMGM voided all losing wagers, paid the winning wagers, and made corresponding tax adjustments in each jurisdiction where the wagers in question were accepted.

9. On March 12, 2026, the Commission sent a Notice of Investigation to BetMGM outlining the violations in this matter.

10. On March 27, 2026, BetMGM acknowledged the Notice of Investigation and accepted responsibility for the errors. BetMGM also outlined additional safeguards to prevent such occurrences in the future.

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

12. BetMGM 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.

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

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

15. BetMGM 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.

16. 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 BetMGM 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 BetMGM should they arise.

17. 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.

18. 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

19. 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.

20. Article III, Section 39(g)9.1 establishes a start date for sports wagering no later than December 1, 2025, and further states that no wagering shall take place in the state before such start date established by the Commission.

21. Section 572.030, RSMo provides that a person commits the offense of promoting gambling in the first degree if he or she knowingly advances or profits from unlawful gambling or lottery activity by permitting more than one wager per day or wagers of more than one hundred dollars per day.

22. 11 CSR 45-20.100(1) states that each licensee an applicant has an ongoing duty to comply with all federal, state, and local laws and regulations and conduct its wagering operations in a manner that does not reflect adversely on the security or integrity of the Missouri sports wagering industry.

23. BetMGM acknowledges and understands that under Article III, Section 39(g) of the *Missouri Constitution* and 11 CSR 45-20, the Commission can discipline BetMGM's Mobile license for such actions that violate Article III, Section 39(g), Section 572.030, RSMo, and 11 CSR

45-20.100 by allowing wagers by Missouri patrons before sports wagering was authorized to begin in the state of Missouri.

ORDER

IT IS AGREED AND STIPULATED THAT as follows:

1. BetMGM, LLC d/b/a BetMGM will pay a fine of \$15,000.00 made payable to the Missouri Gaming Commission within thirty (30) days of the Missouri Gaming Commission's approval of this Settlement Agreement; and
2. BetMGM, LLC d/b/a BetMGM 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: 07/16/2026

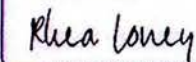


Michael A. Leara
Executive Director
Missouri Gaming Commission

CONSENT AND WAIVER OF HEARING

The undersigned persons understand and acknowledge that BetMGM, LLC d/b/a BetMGM 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.

Signed by:



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BetMGM, LLC d/b/a

BetMGM

By: Rhea Loney

200 Hudson Street

Harborside Plaza 2, Suite 700

Jersey City, NJ 07311

7/16/2026

Date



Nikki D. Evans

General Counsel

Missouri Gaming Commission

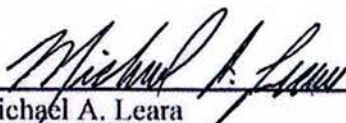
P.O. Box 1847

3417 Knipp Drive

Jefferson City, MO 65109

7/16/2026

Date



Michael A. Leara

Executive Director

Missouri Gaming Commission

P.O. Box 1847

3417 Knipp Drive

Jefferson City, MO 65109

07/16/2026

Date