

MISSOURI GAMING COMMISSION

COMMISSION RESOLUTION NO. 26-064
REGARDING SETTLEMENT OF SPORTS WAGERING DISCIPLINE
BETMGM, LLC D/B/A BETMGM

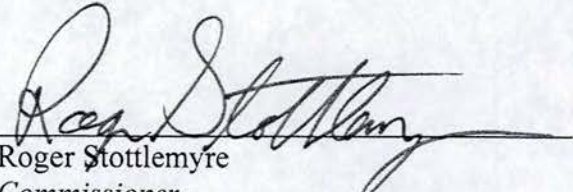
August 26, 2026

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. 20260427001); and

WHEREAS, Licensee and the Commission have come to a settlement concerning the issues presented in the proposed discipline and Licensee shall pay a \$2,500 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 Stottlemyre
Commissioner
Missouri Gaming Commission

IN THE MISSOURI GAMING COMMISSION

In RE: BetMGM, LLC d/b/a)
 BetMGM) DC _____
)
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 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. Missouri's catalog of approved events states that wagering on the NFL Draft is not permitted.

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

5. On April 15, 2026, a member of BetMGM's regulatory team contacted MGC with a notification that BetMGM had accepted wagers on the 2026 NFL Draft.

6. BetMGM confirmed that all wagers had been voided and refunded with the exception of one, as the patron had used an early cash out feature.

7. On April 27, 2026, MGC received the full incident report which detailed that BetMGM had accepted eighty-nine (89) wagers for a total of \$1,675.07 wagered on the NFL Draft between January 26 and April 14, 2026.

8. The report further explained that the NFL Draft had been erroneously "whitelisted" as an approved market and BetMGM had reviewed its procedures to improve identification of approved markets in the future.

9. On May 4, 2026, the Commission sent a Notice of Investigation to BetMGM outlining the violations in this matter.

10. On May 6, 2026, BetMGM acknowledged the Notice of Investigation, accepted responsibility for the errors, and 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. 11 CSR 45-20.150(1) states that licensees shall be subject to the imposition of fines, license probation, license suspension, license revocation, or other disciplinary action for any violation of Article III, Section 39(g) of the *Missouri Constitution*, law, or regulation.

21. 11 CSR 45-20.150(1)(Q) states that grounds for disciplinary action include facilitating, enabling, or participating in sports wagering other than in accordance with Article III, Section 39(g) of the *Missouri Constitution* and laws, rules, and regulations of this state or any other state or country.

22. 11 CSR 45-20.340(1) states that Retail and Mobile licensees may only accept wagers on events approved by the Commission and published in the catalog of approved events.

23. 11 CSR 45-20.450(1) states that Retail and Mobile licensees shall not accept any wager of any type or kind, unless the type or kind of wager and subject of the wager has been approved by the Commission.

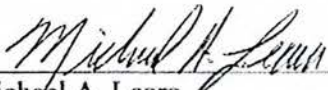
24. BetMGM acknowledges and understands that under Article III, Section 39(g) of the *Missouri Constitution* and 11 CSR 45-20, the Commission can discipline BetMGM's Mobile license for such actions that violate Article III, Section 39(g), 11 CSR 45-20.340, and 11 CSR 45-20.450 by permitting wagers on events not approved by the Commission.

ORDER

IT IS AGREED AND STIPULATED THAT as follows:

1. BetMGM, LLC d/b/a BetMGM will pay a fine of \$2,500.00 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: 06/23/2026

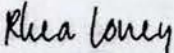


Michael A. Leara
Executive Director
Missouri Gaming Commission

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

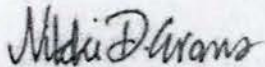
200 Hudson Street

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6/16/2026

Date



Nikki D. Evans

General Counsel

Missouri Gaming Commission

P.O. Box 1847

3417 Knipp Drive

Jefferson City, MO 65109

6/23/2026

Date



Michael A. Leara

Executive Director

Missouri Gaming Commission

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06/23/2026

Date