

IN THE MISSOURI GAMING COMMISSION

In Re:)
) DC-26-104
Harrah's Kansas City, LLC)
d/b/a Harrah's Kansas City)

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 Caesar's Entertainment, Inc. to develop and operate Class B gaming licensees in the state of Missouri.
3. Caesar's Entertainment, Inc. is the parent organization or controlling entity of Harrah's Kansas City, LLC.
4. The Commission issued a Class B riverboat gambling license to Harrah's Kansas City, LLC to conduct games on and operate the excursion gambling boat known as Harrah's Kansas City ("Casino").
5. As the holder of a Class B license, Harrah's Kansas City, LLC, d/b/a Harrah's Kansas City, is subject to the provisions of Sections 313.800 to 313.850, RSMo, and the regulations promulgated thereunder by the Commission.

STATEMENT OF FACTS¹

6. The proposed discipline arises from multiple instances of progressive funds not being transferred from out-of-service electronic gaming devices ("EGDs") to active EGDs within thirty (30) days, in violation of 11 CSR 45-5.200(4) and (5).
7. On March 9, 2026, linked progressive EGDs at location DM01-03 (MGC tags 84422 through 84424) were placed out of service for a scheduled mandatory upgrade to replace revoked software. As a result, \$73.95 in progressive incremental funds were made unavailable for patron play. During software installation, it was found that incorrect software had been provided by Konami Gaming and the EGDs remained out of service until correct software could arrive.
8. On April 13, 2026, Casino Operations Performance Manager Kevin Mitchell ("Mitchell") notified MGC EGD Specialist Jacob Lorenzen that the DM01-03

¹ GR 20260424002

progressive funds had been unavailable for patron play for more than thirty (30) days. On April 15, 2026, Mitchell transferred the DM01-03 progressive incremental funds to another EGD, exceeding the 30-day deadline by seven (7) days.

9. This incident was the third violation of 11 CSR 45-5.200 within the prior ten months. On May 18, 2025, linked progressive EGDs at locations MH05-08 (MGC tags 83700 through 83703) were placed out of service, and \$735.47 in progressive incremental funds were made unavailable for patron play. The EGDs were being relocated to DH05-08 and transitioned to a high-speed network connection but remained out of service for more than thirty (30) days due to a necessary random access memory ("RAM") clear. On June 23, 2025, the progressive incremental funds were transferred to another EGD, exceeding the 30-day deadline by six (6) days. On June 29, 2025, the progressive EGD at location NH01 (MGC tag 76318) was placed out of service and relocated to CB05. The EGD remained out of service due to a faulty door switch and was returned to service on August 5, 2025. The progressive incremental funds were unavailable for patron play for thirty-seven (37) days.

LAW

10. 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.

11. 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 or 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[.]

12. Title 11 CSR 45-5.200 states, in pertinent part, as follows:

(4) A licensee shall not reduce the amount displayed on a progressive jackpot meter or otherwise reduce or eliminate a progressive jackpot unless—

(A) A player wins the jackpot;

(B) The licensee adjusts the progressive jackpot meter to correct a malfunction or to prevent the display of an amount greater than a limit imposed pursuant to section (3) of this rule and the licensee documents the adjustment and the reasons for it;

(C) The licensee's gaming operations at the establishment cease for any reason other than a temporary closure where the same licensee resumes gaming operations at the same establishment within a month;

(D) The licensee distributes the incremental amount to another progressive jackpot that does not require a larger wager on a single play to win the jackpot; or

(E) The commission for good cause approves in writing a reduction, elimination, or distribution that does not meet the requirements in this rule.

(5) If the incremental amount of a progressive jackpot is moved to another EGD, the distribution shall be documented and shall occur within thirty (30) days of the jackpot being removed.

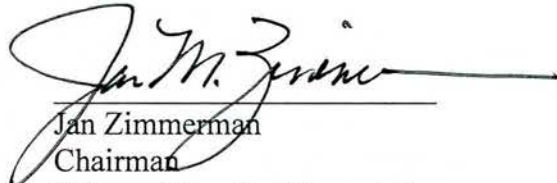
VIOLATIONS

13. As a result of the failure to move progressive jackpot funds to another EGD, the Casino violated 11 CSR 45-5.200(4) and (5).

14. Harrah's Kansas City, LLC, d/b/a Harrah's Kansas City, is therefore subject to discipline for such violations pursuant to Sections 313.805 and 313.812.14(1) and (2), RSMo.

PENALTY PROPOSED

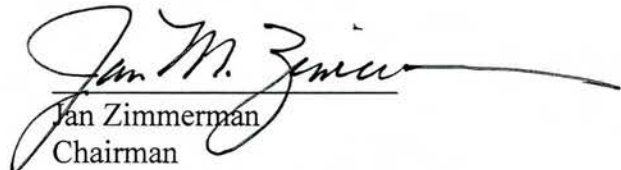
15. Under Section 313.805, RSMo, the Commission has the power to assess any appropriate administrative penalty against Harrah's Kansas City, LLC, as the holder of a Class B license.
16. THEREFORE, it is proposed that the Commission fine Harrah's Kansas City, LLC, d/b/a Harrah's Kansas City, the amount of five thousand dollars (\$5,000.00) 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 ____ day of September, 2026, to:

Ms. Julie Sola
General Manager
Harrah's Kansas City
One Riverboat Drive
North Kansas City, MO 64116


Jan Zimmerman
Chairman
Missouri Gaming Commission