

INDIANA GAMING COMMISSION  
BUSINESS MEETING  
SEPTEMBER 26, 2024

The Indiana Gaming Commission Business Meeting was stenographically taken down by me, Tonya Esparza, RPR, a Notary Public in and for the County of Hamilton, State of Indiana, in the Auditorium of the Indiana Government Center South, 302 West Washington Street, Indianapolis, Indiana, commencing at the hour of 11:01 a.m., September 26, 2024. The following transcript is a true and accurate transcript of the proceedings held.

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A P P E A R A N C E S

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2  
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ON BEHALF OF THE GAMING COMMISSION:

Milton Thompson, Chairman

Michael E. Williams, Commissioner

Daniel Housman, Commissioner

Adam L. Hill, Commissioner

Dennis Mullen, Executive Director

Jennifer Reske, Deputy Director

I N D E X

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11  
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13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

PAGE

Call to Order and Roll Call .....4  
Approval of Minutes .....5  
Report of the Executive Director .....5  
    Staff Update .....5  
    Reinvestigations .....12  
    Exclusions .....12  
    Waiver Summary .....12  
Administering the Oath to Presenters .....13  
Old Business .....14  
New Business .....14  
License Renewals  
    Suppliers .....14  
    Casinos .....15  
    Certificate of Authority renewals .....16  
Vendor Renewals .....17  
Paid Fantasy Sports .....18  
Permanent Licenses  
    Suppliers .....20  
    Sports Wagering Vendors .....20  
    Certificate of Authority .....20  
    Paid Fantasy Sports .....22  
Occupational Licenses  
    Disciplinary Actions - License Denials .....25  
    Disciplinary Actions - Settlements .....27  
Rule Readoption .....28  
Final Rules Adoption .....30  
Presentation - Gaming Integrity Division .....36

1           CHAIRMAN THOMPSON: Good morning. It is now  
2 11:01. We apologize for being one minute late.  
3 We'll make it up, as they say. My pilot, last  
4 night on the way back from New York said we'll  
5 make it up. I said okay, you make it up while I  
6 wake up.

7           My name is Milton Thompson. I would like to  
8 call to order our Gaming Commission meeting here  
9 on September 26, 19 -- 1924 -- 2024.

10          EXECUTIVE DIRECTOR MULLEN: Back in time.

11          CHAIRMAN THOMPSON: Call our roll call. Our  
12 new executive director, Dennis Mullen.

13          EXECUTIVE DIRECTOR MULLEN: My pleasure.  
14 Chairman Thompson.

15          CHAIRMAN THOMPSON: I'm here.

16          EXECUTIVE DIRECTOR MULLEN: Commissioner  
17 Hill.

18          COMMISSIONER HILL: Here.

19          EXECUTIVE DIRECTOR MULLEN: Commissioner  
20 Housman.

21          COMMISSIONER HOUSMAN: Here.

22          EXECUTIVE DIRECTOR MULLEN: Commissioner  
23 Williams.

24          COMMISSIONER WILLIAMS: Here.

25          EXECUTIVE DIRECTOR MULLEN: We have a

1 quorum.

2 CHAIRMAN THOMPSON: Thank you. We have a  
3 quorum established, and with that, I would like  
4 to see if we consider approval of the minutes.  
5 And Commissioners have -- you reviewed the  
6 minutes from June 20th, 2024.

7 And are there any additions or corrections?  
8 Is there a motion to consider to approve  
9 them?

10 COMMISSIONER WILLIAMS: I make that motion  
11 to approve.

12 CHAIRMAN THOMPSON: Is there a second?

13 COMMISSIONER HILL: I'll second.

14 CHAIRMAN THOMPSON: Motion and second to  
15 approve the minutes.

16 Hearing no other comments or discussion, all  
17 those in favor signify by stating aye.

18 (Chorus of ayes.)

19 The ayes have it.

20 Mr. Mullen, we would like to have a report  
21 of executive director.

22 EXECUTIVE DIRECTOR MULLEN: My pleasure,  
23 Chair. I'll take the obvious one first since  
24 we're missing someone on the dais that's usually  
25 here. I want to take a moment to acknowledge and

1           thank Former Executive Director Greg Small for  
2           his contributions to the IGC and the State. His  
3           accomplishments are too many to name, but to name  
4           a few, during his tenure with the Commission, he  
5           was in integral parts of creating the framework  
6           to allow casinos to move inland; the successful  
7           launches in paid fantasy sports and sports  
8           wagering, of which the state of Indiana was the  
9           first to maneuver; and as executive director he  
10          oversaw the first competitive casino license  
11          grant in over a decade leading to the opening of  
12          the state's 13th casino, the Terre Haute Casino  
13          and Resort. In addition, he made sure the IGC  
14          has the internal systems in place to be able to  
15          be successful in fulfilling its mission well into  
16          the future. We thank Greg for his service, and  
17          we wish him all the best in his new role.

18                 Next, I want to also recognize Commissioner  
19          Jason Dudich for his time serving on the  
20          Commission. Commissioner Dudich has informed us  
21          that based upon his July 1st appointment of vice  
22          president of finance in administration, NCFO for  
23          Indiana University, that he needed to step down  
24          from his role as Commissioner at the Gaming  
25          Commission. Jason served as Commissioner for

1 five years and always contributed meaningfully to  
2 the Gaming Commission and the State during his  
3 tenure. I know I speak for both Commissioners  
4 and staff and likely the State as a whole in  
5 thanking Jason for his service, and we wish him  
6 the best of luck in his future endeavors as well.

7 CHAIRMAN THOMPSON: I had fine experiences  
8 with both of those men, spent time with Greg in  
9 our former lives. He's an attorney. He's also  
10 served on the board of directors of the baseball  
11 organization that I founded here in Indiana, now  
12 called RBI of Indiana, Reviving Baseball in Inner  
13 Cities, but he was on that board of directors.

14 And we later spent some time in his law firm  
15 that advised our Indianapolis Indians of which  
16 I'm also board of directors. So Greg and I go  
17 way back. So we got together here and spent  
18 considerable amount of talent -- time talking  
19 about those old good times as well as a lot of  
20 legal issues that are germane and link to -- to  
21 here.

22 I also go back with Mr. Dudich when he was  
23 serving as a deputy mayor in the City of  
24 Indianapolis and spent time there consulting with  
25 them and some of the best practices that he

1 created. Spent time with our lottery commission,  
2 and he was also an advisor for meeting on some of  
3 the financial matters that pertain to that.

4 So I've had fond memories of both of those  
5 men, and I want to also make publicly known that  
6 I will thank them for their continued service.

7 At the same time, I want to welcome Dennis.  
8 As you guys know, Dennis has been serving the  
9 role of general counsel for this organization as  
10 a good -- good job and is probably as experienced  
11 as anyone who has ever sat in this chair. As he  
12 was serving general counsel, we would have  
13 regular conversations, not only with Greg and  
14 with our deputy director Jenn, we would spend a  
15 lot of time going through the fundamentals and  
16 foundations of what has really made the sports  
17 gambling piece a nice tradition. Dennis was the  
18 architect of that. So let's go to lunch and you  
19 tell me a little bit more about it. And from  
20 that led to my suggestion to Greg and rest of  
21 staff is that we have a prominent part of the  
22 agency to speak publicly, and we've had that for  
23 the last year of our tenure, and I've learned a  
24 lot, and I think the public has learned a lot for  
25 us in terms of full transparency. We're going to



1 do that later on in this meeting here with their  
2 Integrity Division.

3 So I wanted to thank you and welcome you,  
4 Dennis.

5 Now would you take the time to finish your  
6 report.

7 EXECUTIVE DIRECTOR MULLEN: Yes, I would be  
8 glad to.

9 CHAIRMAN THOMPSON: Take time to read the  
10 roll.

11 EXECUTIVE DIRECTOR MULLEN: Yes. And thank  
12 you for the kind words. We appreciate it very  
13 much.

14 Next, I want to acknowledge our new hires,  
15 and if you don't mind, please, standing as I  
16 announce you.

17 First, I want to welcome two hires in our  
18 Charity Gaming Division. Megan Matyi is a  
19 clerical assistant.

20 Welcome, Megan.

21 Covering the reception desk at the IGC  
22 office. Along with being receptionist, Megan  
23 will be assisting the Charity Gaming Division  
24 with administrative duties. Megan is a recent  
25 graduate of Indiana State University where she

1 earned a bachelor of fine arts with a minor in  
2 business administration. Along with being a  
3 talented artist, while in school she was the vice  
4 president of Foundation and Community Service for  
5 Delta Gamma Fraternity, and continues to support  
6 and be active with that organization.

7 Next, we have Carla Mascari [phonetic].

8 MS. MASCARI: Mascari.

9 EXECUTIVE DIRECTOR MULLEN: Mascari, excuse  
10 me. Thank you. Is also a clerical assistant  
11 covering the receptionist desk. Along with her  
12 other duties, Carla will be assisting other  
13 divisions with administrative duties as needed.  
14 Carla has several years of experience in customer  
15 service and administration. Carla is new to  
16 state government.

17 Welcome.

18 And is looking forward to settling in and  
19 then completing her bachelor's degree at Indiana  
20 University Indianapolis.

21 In our compliance division, Thomas Biddle is  
22 an assistant director. I don't see Thomas in  
23 attendance today. Thomas is a recent graduate  
24 from Huntington University with a bachelor's  
25 degree in sports management as well as a master's

1 of business administration. He recently moved to  
2 the Indianapolis area a little under a year ago  
3 and is loving it so far. He's excited to step  
4 into his new role with the IGC to see how he can  
5 make an impact and contribute to building on a  
6 great work environment here.

7           Melanie Hebig [phonetic] recently started  
8 with the IGC's IT department. She's in the back.

9           Hi, Melanie.

10           Melanie started with the State in 2017 with  
11 the Department of Workforce Development, then  
12 transferring to INDOT, and then to the IGC in  
13 August as a senior applications system analyst.  
14 Her expertise is a SharePoint and the Power  
15 Platform. She enjoys spending time outdoors with  
16 her husband and two toy Schnauzers.

17           And then finally we have Sydney Moody.

18           Hi, Sydney.

19           Sydney is a student extern joining our legal  
20 division. Sydney is from New Carlisle, Indiana,  
21 and went to Purdue University for undergraduate  
22 degree where she majored in political science and  
23 law and society. She decided to pursue a legal  
24 career after interning at the Indiana House of  
25 Representatives and the local public affairs

1 group. She's currently in her second year at the  
2 IU McKinney School of Law, and she decided to  
3 join the IGC to merge her passion with public  
4 policy with her interest in gaming regulation.

5 As for reinvestigations, our investigations  
6 division has completed reinvestigations for  
7 licensees BetMGM, Novomatic, and Galaxy Gaming.  
8 The confidential reports are in your materials.  
9 Directors Leek and Brown are present should you  
10 have any questions.

11 Exclusions. Since the March business  
12 meeting, Commission staff has added 19  
13 individuals to the exclusion list which now  
14 totals 1,072 individuals.

15 Waivers. The IGC has granted 12 wager --  
16 waivers, excuse me, to the Indiana casinos since  
17 the previous meeting. This information is  
18 included with your Commission packet and will  
19 also be posted on the Commission's website.

20 Finally, I wanted to bring a couple items on  
21 our agenda to your attention before we -- before  
22 we roll into those items.

23 First, we'll have for presentation today our  
24 rules packet and pursuant to compliance of the  
25 House Enrolled Act 1623. Staff has successfully

1 completed these rule packets and went above and  
2 beyond what is required in the law regarding  
3 these packets. We had informal comment period as  
4 our longstanding principle with industry  
5 stakeholders and received wonderful feedback and  
6 dialogue related to our rules.

7 Once we commenced our formal comment period  
8 on these rule packages, we only received one  
9 comment on them, which I think speaks to how well  
10 these rules have been together and the input that  
11 has been provided previously.

12 Next, I wanted to note to Commissioners  
13 regarding disciplinary actions today. You'll  
14 notice we have an abbreviated disciplinary report  
15 on today's agenda, and this was a decision made  
16 in order to best manage personnel issues with  
17 multiple staff on leave. Staff will include  
18 quarter three disciplinary actions for  
19 presentation at our December meeting.

20 This concludes my report, Chairman.

21 CHAIRMAN THOMPSON: Thank you, Mr. Executive  
22 Director.

23 Now, would you proceed with presenting the  
24 oath.

25 For those will be presenting, would you

1 please stand today.

2 EXECUTIVE DIRECTOR MULLEN: All right.  
3 Repeat after me, please, if you plan on  
4 presenting today. I, state your name, do hereby  
5 solemnly swear subject to the penalties of  
6 perjury to tell the truth, the whole truth, and  
7 nothing but the truth. So help me God.

8 Thank you.

9 CHAIRMAN THOMPSON: Thank you.

10 Commissioners, any old business today for  
11 us?

12 Hearing no old business, no old business?

13 On to new business. Any new business?

14 That's what I like. No old business, no new  
15 business, meaning we have no business at all.

16 But we do have license renewals which will  
17 be first up here.

18 Attorney Neal, would you present our  
19 Order 2024-109 through 115.

20 Good morning.

21 MR. NEAL: Morning, Commissioners, executive  
22 staff.

23 First, you have before you Order 2024-109.  
24 Pursuant to Indiana Code Section 4-33-7-8 and  
25 68 IAC Section 2-2-8, a supplier's license must

1 be renewed each year along with payment of a  
2 \$7500 renewal fee. Each of the following  
3 licensees has submitted a timely request for  
4 renewal along with the required payment.

5 That includes Geocomply Solutions,  
6 Incorporated; Gaming Partners International USA,  
7 Incorporated; Aces Up Gaming, Incorporated; EDF  
8 Compliance LLC doing business as Odds on  
9 Compliance; Everi Games, Incorporated; GLP  
10 Capital, LP; Galaxy Gaming; NYX Digital; Global  
11 Surveillance Associates; and AGS LLC.

12 Approving Order 2024-109 would have the  
13 effect of renewing the license of each of the  
14 respective licensees for a period of one year.  
15 Thank you.

16 And next on the agenda we have before you  
17 Orders 2024-110, 2024-111, and 2024-112 regarding  
18 the renewal of Blue Chip, Rising Star, and  
19 Belterra's casino owner's license respectively.

20 Blue Chip, Rising Star, and Belterra have  
21 all filed the proper paperwork and paid their  
22 renewal fee.

23 Previously by Orders 2023-114, 2023-115, and  
24 2023-164, the Commission had approved the written  
25 power of attorney for Blue Chip, Rising Star, and

1 Belterra respectively.

2 These approvals expired upon the renewal of  
3 the casino owner's license, and for that reason,  
4 all casinos must request renewal of the  
5 Commission's approval of the written power of  
6 attorney concurrently with the request for  
7 renewal or present the Commission with a new  
8 written power of attorney naming a new  
9 trustee-in-waiting. Blue Chip, Rising Star, and  
10 Belterra have all stated their intent to maintain  
11 their existing trustees-in-waiting and have not  
12 presented the Commission with any modifications.

13 Approving Orders 2024-110, 2024-111, and  
14 2024-112 would have the effect of renewing the  
15 license and approving the power of attorney for  
16 Blue Chip, Rising Star, and Belterra respectively  
17 for a period of one year.

18 And next you have before you Order 2024-113.  
19 Pursuant to Indiana Code Section 4-38-8-1, a  
20 certificate of authority must be renewed each  
21 year along with payment of a \$50,000 renewal fee.  
22 Each of the following certificate holders has  
23 submitted a timely request for renewal along with  
24 the required payment.

25 Ameristar East Chicago LLC; Centaur



1 Acquisition LLC doing business as Horseshoe  
2 Indianapolis; Indiana Gaming Company LLC doing  
3 business as Hollywood; Hoosier Park LLC doing  
4 business as Caesars Race and Sportsbook  
5 Indianapolis; Horseshoe Hammond LLC; Blue Chip  
6 LLC; Blue Sky Casino LLC doing business as French  
7 Lick Resort; Belterra Resort Indiana LLC; Aztar  
8 Indiana Gaming Company LLC doing business as  
9 Bally's Evansville; CSI Operating Company LLC  
10 doing business as Caesars Southern Indiana;  
11 Centaur Acquisition LLC doing business as Caesars  
12 Race and Sportsbook Clarksville; Hoosier Park LLC  
13 doing business as Harrah's Hoosier Park; Hoosier  
14 Park LLC doing business as Caesars Race and  
15 Sportsbook New Haven; and CDITH LLC doing  
16 business as Terre Haute Casino Resort.

17 Approving Order 2024-113 would have the  
18 effect of renewing the certificates of the  
19 respective licensees for a period of one year.

20 And now you have before you Order 2024-114.  
21 Pursuant to Indiana Code Section 4-38-6-6, a  
22 vendor's license must be renewed each year along  
23 with payment of \$50,000 renewal fee. Each of the  
24 following licensees has submitted a timely  
25 request for renewal along with the required

1 payment.

2 American Wagering, Incorporated, doing  
3 business as Caesars Sportsbook, a vendor for  
4 Hoosier Park; Betfair Interactive US doing  
5 business as FanDuel for Blue Chip; Betfair  
6 Interactive US doing business as FanDuel for  
7 Belterra; Crown Indiana Gaming LLC doing business  
8 as DraftKings for Ameristar; Rush Street  
9 Interactive, LP, doing business as BetRivers for  
10 French Lick; American Wagering, Incorporated,  
11 doing business as Caesars Sportsbook for  
12 Horseshoe Hammond; and American Wagering,  
13 Incorporated, doing business as Caesars  
14 Sportsbook for Caesars Southern.

15 Approving Order 2024-114 would have the  
16 effect of renewal the license of each of the  
17 respective licensees for a period of one year.

18 And, finally, you have before you  
19 Order 2024-115. Pursuant to Indiana Code Section  
20 4-33-24-15 and 68 IAC Section 26-3-10, a paid  
21 fantasy sports operator license must be renewed  
22 each year along with payment of a \$5,000 renewal  
23 fee. The following licensees have submitted a  
24 timely request for renewal along with that  
25 required payment.

1           SidePrize LLC doing business as PrizePicks;  
2 SportsHub Regulatory LLC; Yahoo Fantasy Sports  
3 LLC.

4           And approving Order 2024-115 would have the  
5 effect of renewing the license of each of the  
6 respective licensees for a period of one year.

7           Thank you.

8           CHAIRMAN THOMPSON: Thank you.

9           Questions for Mr. Neal, Commissioners?

10          Is there a motion for Orders 2024-109  
11 through 2 -- 2024-115?

12          COMMISSIONER HILL: I'll make a motion to  
13 approve.

14          CHAIRMAN THOMPSON: Is there a second?

15          COMMISSIONER WILLIAMS: Second.

16          CHAIRMAN THOMPSON: Motion and a second.

17          Any discussion?

18          Hearing none, all those in favor of the  
19 motion, signify by stating aye, please.

20          (Chorus of ayes.)

21          Opposed, same sign?

22          Hearing none, the motion carries.

23          Thank you, Mr. Neal.

24          Now we're going to have director of  
25 background investigations, Garth Brown, will

1 present Order 2024-116 through 118.

2 Good morning.

3 MR. BROWN: Morning. I like these morning  
4 meetings. Thank you.

5 CHAIRMAN THOMPSON: There you go, so we can  
6 be finished by the morning.

7 MR. BROWN: Well, good morning,  
8 Commissioners and executive staff.

9 You have before you three orders, 2024-116,  
10 2024-117, and 2024-118, all of which reference  
11 granting permanent licenses to three different  
12 gaming entities.

13 Order 2024-116 would grant a permanent  
14 supplier's license to Score Media & Gaming which  
15 provides its online sports betting services to  
16 licensees to facilitate online sports wagering  
17 operations.

18 2024-117 would grant a permanent sports  
19 wagering vendor license to Bet365 finding it  
20 suitable to offer its online sports wagering  
21 services in Indiana.

22 Order 2024-118 would grant a permanent  
23 certificate of authority to CDITH LLC doing  
24 business as Terre Haute Casino Resort allowing it  
25 to offer sports wagering to its patrons.

1           Commission staff conducted background and  
2 financial investigations on each of these  
3 applicants, along with substantial owners and key  
4 persons as necessary. Commission staff found no  
5 material derogatory information that would affect  
6 the suitability for any of the applicants.  
7 Staff's final reports are included in your  
8 confidential Commission meeting documents for  
9 your review.

10           Approving Orders 2024-116 through 2024-118  
11 would grant permanent licenses for the previously  
12 mentioned applicants.

13           I'm happy to answer any questions.

14           CHAIRMAN THOMPSON: Questions,  
15 Commissioners, for Mr. Brown?

16           Hearing none, is there a motion on  
17 Orders 2024-116 through 118?

18           COMMISSIONER WILLIAMS: I'll make that  
19 motion to approve.

20           CHAIRMAN THOMPSON: Is there a second?

21           COMMISSIONER HILL: Second.

22           CHAIRMAN THOMPSON: Motion and a second.  
23 Any discussion?

24           Hearing none, all those in favor of the  
25 motion, state aye, please.

1 (Chorus of ayes.)

2 Opposed, same sign?

3 Motion carries.

4 MR. BROWN: Thank you.

5 CHAIRMAN THOMPSON: Thank you very much,  
6 Mr. Brown.

7 Assistant director of sports wagering  
8 Leia Foster will now present Order 2024 through  
9 119.

10 Good morning.

11 MS. FOSTER: Good morning, Commissioners.  
12 Good morning, executive staff.

13 You have before you Order 2024-119 granting  
14 a permanent paid fantasy sports operator license  
15 to Underdog Sports LLC. The applicant has  
16 submitted the required application and fees.  
17 Commission staff conducted a background and  
18 financial investigation on Underdog and found no  
19 derogatory information that would affect  
20 suitability. Staff's final report is included in  
21 the confidential packet that was provided to you.

22 Approving Order 2024-119 will grant a  
23 permanent Paid Fantasy Sports operator license to  
24 Underdog Sports LLC doing business as Underdog  
25 Fantasy.

1 I'll be happy to answer any questions you  
2 have.

3 CHAIRMAN THOMPSON: Questions of  
4 Mrs. Foster?

5 Hearing none, is there a motion on  
6 Order 2024 through 119? Is there a motion?

7 COMMISSIONER HOUSMAN: Motion to approve.

8 CHAIRMAN THOMPSON: Motion.

9 Is there a second?

10 COMMISSIONER HILL: I'll second.

11 CHAIRMAN THOMPSON: Motion and a second.

12 Any discussion?

13 Hearing none, all those in favor, state aye,  
14 please.

15 (Chorus of ayes.)

16 Opposed, same sign?

17 Motion carries.

18 Disciplinary actions.

19 MR. SHELTON: Good morning, Commissioners  
20 and executive staff.

21 You have before you a settlement agreement  
22 concerning the disciplinary action against Rush  
23 Street Interactive doing business as BetRivers.

24 Order 2024-120 is a settlement agreement  
25 with Rush Street Interactive wherein BetRivers

1 violated the rules for prohibited participants.

2 On January 23rd, 2024, it was determined  
3 that an excluded patron had activity on the  
4 BetRivers platform. A review of the patron's  
5 account showed that over the course of 18 days,  
6 the patron deposited \$3,734.25, wagered  
7 \$13,659.56, won \$11,976.09, and withdrew  
8 \$2,054.05.

9 Additionally, on February 27th, 2024, it was  
10 determined that the BetRivers improperly removed  
11 73 -- 173 active patrons from the exclusion list.

12 A review of the patron account show that  
13 over the course of three days dated February 9th,  
14 2016, through February 12, 2024, 16 players  
15 deposited funds to their account, 18 players  
16 placed wagers, and three withdrew funds following  
17 the exclusion removal. The total amount  
18 deposited was \$10,564, the total amount wagered  
19 was 39,764.75, and the total amount withdrawn  
20 \$5,469.51.

21 The settlement agreement outlines  
22 BetRivers's acknowledgement of its errors and the  
23 measures that they have taken to prevent such  
24 incident in the future, including no longer  
25 sending automatic messages to formerly excluded



1 patrons and implementing measures to confirm  
2 accuracy of exclusion data.

3 Rush Street Interactive has agreed to a  
4 monetary settlement of \$54,000. Relevant details  
5 of this settlement agreement have been provided  
6 in your meeting materials. The settlement  
7 agreement will also be available on the  
8 Commission's website following the meeting.

9 Mr. Chair, this concludes my presentation.

10 CHAIRMAN THOMPSON: Thank you. Dan Shelton  
11 is director of sports wagering.

12 Think you have any questions of Mr. Shelton?  
13 Is there a motion on Order 2024 through 120?

14 COMMISSIONER HILL: I'll make a motion.

15 CHAIRMAN THOMPSON: Is there a second?

16 COMMISSIONER HOUSMAN: Second.

17 CHAIRMAN THOMPSON: Motion and a second.

18 Any discussion?

19 All those in favor of the motion, signify by  
20 stating aye, please.

21 (Chorus of ayes.)

22 And opposed, same sign?

23 Motion carries.

24 Then we'll have occupational licenses.

25 Staff attorney Zac Watson, present the matters

1 concerning occupational licenses under  
2 Orders 2024-121 through 130.

3 MR. WATSON: Morning, Commissioners --

4 CHAIRMAN THOMPSON: Morning.

5 MR. WATSON: -- executive staff.

6 Commissioners, before you you have  
7 Orders 2024-121 through 124 concerning  
8 applications for an occupational licenses. These  
9 applicants failed to disclose their complete  
10 criminal history and/or had a felony conviction,  
11 and therefore failed to meet the established  
12 standards for licensure.

13 The applicants were given an opportunity to  
14 withdraw their application from consideration but  
15 have failed to do so. Detailed information  
16 regarding these orders is contained in your  
17 confidential Commission materials.

18 Approving Order 2024-121 through 124 would  
19 have the effect of denying these applications.

20 CHAIRMAN THOMPSON: Is there a motion on  
21 Orders 2024-121 through 124?

22 COMMISSIONER WILLIAMS: I'll make that  
23 motion to approve.

24 CHAIRMAN THOMPSON: Is there a second?

25 COMMISSIONER HILL: I'll second.

1 CHAIRMAN THOMPSON: Motion and a second.

2 All those in favor of the motion, signify by  
3 stating aye.

4 (Chorus of ayes.)

5 All right. Opposed, same sign?

6 Motion carries.

7 MR. WATSON: Next before you, you have  
8 Order 2024-125 through 130. These orders concern  
9 settlement agreements between Commission staff  
10 and occupational licensees.

11 In lieu of disciplinary action, Commission  
12 staff offered each of these licensees a  
13 settlement agreement that would have them agree  
14 to unpaid voluntary relinquishment of their  
15 occupational license for a period of regularly  
16 scheduled working days with no vacation or other  
17 paid time off used.

18 Each of these licensees have agreed to the  
19 terms of the settlement agreements. Detailed  
20 information regarding these matters is contained  
21 in your confidential materials.

22 Approving Order 2024-125 through 130 would  
23 have the effect of ratifying these agreements  
24 with the occupational licensees.

25 CHAIRMAN THOMPSON: Thank you.

1           Is there a motion on Orders 2024-125 through  
2 130?

3           COMMISSIONER HILL: I'll make a motion to  
4 approve.

5           CHAIRMAN THOMPSON: Is there a second?

6           COMMISSIONER WILLIAMS: I'll second.

7           CHAIRMAN THOMPSON: Motion and a second.

8           Any discussion? Or questions of Mr. Watson?

9           All those in favor, signify by stating aye.

10          (Chorus of ayes.)

11          Opposed, same sign?

12          Hearing none, the motion carries.

13          MR. WATSON: Thank you.

14          CHAIRMAN THOMPSON: Thank you.

15          Now we're going to have a readoption of the  
16 rules and hear a little bit from our director  
17 about those rules, and we're actually pretty  
18 proud of staff about how it is we've been able to  
19 maintain the kind of scrutiny that's necessary  
20 from our executive branch and the scrutiny of our  
21 legislative branch as well.

22          And attorney Chris Neal, will you now  
23 present the Resolution 2024 --

24          EXECUTIVE DIRECTOR MULLEN: Chair, if I  
25 may --

1           CHAIRMAN THOMPSON: Yes, please.

2           EXECUTIVE DIRECTOR MULLEN: -- to those  
3 comments, one thing I forgot to mention that I  
4 wanted to is that, you know, staff celebrate the  
5 fact that the governor's office held out our  
6 process and rule framework as sort of a model for  
7 other agencies to adopt as they go through this  
8 process as well.

9           So I would be remiss if I didn't mention  
10 that when you read it initially. Thank you.

11          CHAIRMAN THOMPSON: We've grown to accept  
12 nothing less. So congratulations. And we are a  
13 model because of your hard work.

14          So continue on, Mr. Neal.

15          MR. NEAL: Commissioners, you have before  
16 you Resolution 2024-131. Resolution 2024-131  
17 concerns the readoption of administrative rules  
18 that are set to expire on January 1st of this  
19 coming year.

20          Administrative rules adopted under Indiana  
21 Code Chapter 4-22-2 expire on January 1st of the  
22 fifth year after the year in which the rule takes  
23 effect unless the rule is readopted.

24          Commission staff has filed the required  
25 notices and completed the readoption review as

1 well as the required public comment period.

2 Accordingly, Resolution 2024-131, if  
3 approved, will readopt the sections identified in  
4 the notice of intent without any changes or  
5 edits. The readopted final rule will then be  
6 filled with the Indiana Register.

7 And next, I would like to turn your  
8 attention to those new -- those resolutions  
9 involving the new promulgation of administrative  
10 rules, and you have before you Resolutions  
11 2024-132, 2024-133, 2024-134, and 2024-135 on  
12 fines, fees, and penalties regarding fighting  
13 sports, paid fantasy sports, casinos, suppliers,  
14 and sports wagering vendors, and charity gaming  
15 respectively.

16 As you know, we have been operating under  
17 the safe harbor provision of Indiana Code  
18 4-22-2-19.6 regarding certain fines assessed by  
19 the Commission. The rules before you today have  
20 all satisfied Indiana's rule promulgation  
21 process.

22 Specifically, the following steps have been  
23 completed leading up to today, and I know Dennis  
24 mentioned most of them, but I'll repeat here.

25 Before beginning the process, Commission

1 staff reached out to stakeholders for their  
2 input. In December of last year, Commission  
3 staff brought the rules before the State budget  
4 committee as required for any rules regarding  
5 fines, fees, and civil penalties per Indiana Code  
6 4-22-2-19.6.

7 In March of this year, the Office of  
8 Management and Budget approved the Commission  
9 staff's request to promulgate each of the rules.

10 On April 3rd, 2024, the Legislative Services  
11 Agency posted first notices of public comment  
12 period and notices of public hearing in the  
13 Indiana Register for each rule individually.

14 Commission staff held the public hearings,  
15 responded to any comments received, and some  
16 comments have been addressed through certain  
17 changes to the initial proposed rule. Public  
18 comments are available by request.

19 The notice and second public comment period  
20 and hearing is posted for each rule that received  
21 substantive comments per Indiana code. No  
22 comments were received during that second public  
23 comment periods or at the second public hearings.

24 Should the rules be approved by the  
25 Commission, Commission staff will submit the

1 final rule to the Office of Indiana Attorney  
2 General for approval, and then they'll submit to  
3 governor's office for final approval.

4 The final rule will then be submitted to  
5 Legislative Services Agency for posting in the  
6 Indiana Register.

7 Commission staff has recommended approval of  
8 Resolutions 2024-132, 2024-133, 2024-134, and  
9 2024-135 which will have the effect of adopting  
10 the final rules regarding fines, fees, and  
11 penalties for entities regulated by the  
12 Commission.

13 I'm happy to answer any questions on that.

14 CHAIRMAN THOMPSON: Commissioners, any  
15 questions provided the rules, the confidential  
16 materials? No questions of Mr. Neal?

17 Is there a motion on Resolutions 2024-132  
18 through 135?

19 COMMISSIONER HILL: I'll make a motion to  
20 approve.

21 CHAIRMAN THOMPSON: Motion.

22 Is there a second?

23 COMMISSIONER HOUSMAN: I'll second.

24 CHAIRMAN THOMPSON: Motion and a second.

25 Any discussion?



1           Hearing none, all those in favor of the  
2 motion, please signify by stating aye.

3           (Chorus of ayes.)

4           And those opposed, same sign?

5           Hearing none, matter is approved.

6           Thank you so much.

7           Mr. Watson, you again, will you take a look  
8 at our casino merits.

9           MR. WATSON: Commissioners, before you you  
10 have Order 2024-136 concerning request received  
11 by casino licensee Caesars Entertainment,  
12 Incorporated, requesting approval of a proposed  
13 financial transaction.

14           In addition to seeking permission to act on  
15 the proposed financial transaction, Caesars also  
16 requested a waiver of 68 IAC so-called  
17 two-meeting requirement in accordance with  
18 Commission's authority contained in Resolution  
19 2017-109.

20           The confidential details of those financial  
21 transactions as well as the Commission status  
22 analysis were provided to the Commissioners in  
23 the confidential materials.

24           In accordance with procedures identified in  
25 Resolution 2017-109, Caesars was issued an

1 interim approval of its proposed financial  
2 transactions. Interim approval contained in the  
3 following condition -- contained the following  
4 conditions.

5 First, the terms articulated in the final  
6 financial documentation do not materially differ  
7 from the terms that were presented in the writing  
8 approval.

9 Second, the terms of the financial  
10 documentation do not violate IAC 4-33 or 4-35.

11 Third, Caesars must provide the Commission  
12 with a legal opinion demonstrating compliance  
13 with IC dash 433 and 435.

14 And, finally, Caesars must close on its  
15 respective financial transaction by a certain  
16 date.

17 Resolution 2017-109 requires that interim  
18 financial approval that is issued must be  
19 reported to the Commission for consideration and  
20 final ratification or other direction.

21 CHAIRMAN THOMPSON: That was preliminary  
22 items were presented and we gave our approvals  
23 and are moving forward with that.

24 Is there a motion on Order 2024 through 136?

25 COMMISSIONER WILLIAMS: I'll make that

1 motion to approve.

2 CHAIRMAN THOMPSON: Is there a second?

3 COMMISSIONER HILL: Second.

4 CHAIRMAN THOMPSON: There's a motion and  
5 second on approval.

6 Any discussion further?

7 All in favor of the motion, please signify  
8 by stating aye.

9 (Chorus of ayes.)

10 Opposed, same sign?

11 Hearing none, the motion carries.

12 Thank you so much.

13 MR. WATSON: Thank you.

14 CHAIRMAN THOMPSON: Now we're going to have  
15 our special presentation. So you want to do the  
16 introduction?

17 EXECUTIVE DIRECTOR MULLEN: I would love to,  
18 thank you. Thank you, Chair.

19 Presenting for the Gaming Integrity Division  
20 is Investigator Manny Becker. I want to  
21 highlight for you all, Commissioners, and those  
22 watching that Investigator Becker was awarded  
23 this year's award of excellence by the Indiana  
24 Inspector General.

25 During that presentation, Investigator

1 Becker was honored for his effectiveness in  
2 conducting complex investigations, expeditiously  
3 and thoroughly. His ability to build good  
4 relationships with stakeholders and success in  
5 efforts that helped bring a multimillion dollar  
6 narcotics trafficking and money laundering  
7 organization to justice.

8 This successful case was also showcased by  
9 the US Department of Treasury in its 2024  
10 national money laundering risk assessment.

11 Investigator Becker is often asked to  
12 present to various groups, including the Indiana  
13 prosecuting attorneys counsel and at the annual  
14 AML/BSA conference in Las Vegas, and he has  
15 earned an excellent reputation for expertise in  
16 the area of money laundering investigations. His  
17 work is key to the mission of the IGC and is a  
18 positive reflection of the Commission's  
19 dedication to a culture of integrity.

20 We're very pleased to have him present to  
21 you today. We've been looking forward to it.

22 CHAIRMAN THOMPSON: I've had the wonderful  
23 opportunity to work with Mr. Cook, and if he  
24 gives you that kind of a high sign, it's got to  
25 be good. Welcome.

1 MR. BECKER: Not the first time to do it  
2 really well.

3 Good morning, Commissioners and executive  
4 staff. My name is Manny Becker, and may it  
5 please the Commission, I'm here today to present  
6 on behalf of the Gaming Integrity Division.

7 I want to begin by sharing the mission  
8 statement of the Gaming Integrity. Our mission  
9 is to proactively work in partnership with  
10 casinos to analyze information, and when  
11 appropriate, conduct investigations with other  
12 initiatives to deter financial crimes and other  
13 activities negatively impacting the integrity of  
14 the gaming industry in Indiana while ensuring  
15 compliance with all federal and state BSA/AML  
16 requirements.

17 This presentation is an overview of the  
18 organizational structure and key components that  
19 uphold gaming integrity in Indiana casinos.

20 We will begin with an organizational chart  
21 and provide a brief background of each team  
22 member. Other topics will include a brief  
23 discussion on federal and state of Indiana  
24 regulations that govern gaming operations. And  
25 finally, I will present a few case investigation

1 examples.

2 This is the org chart for the Gaming  
3 Integrity Division. Mr. Frank Brady is the  
4 director of the Gaming Integrity Division. He  
5 came to the IGC in its inception in 1994. Prior  
6 to the IGC, he worked with the US Department of  
7 Treasury for 28 years. His assignments included  
8 working New York, Louisiana, and Indiana.

9 Mr. Bill Peevler is an investigator with  
10 27 years of previous law enforcement experience  
11 with the Indiana State Police. Upon his retiring  
12 from the Indiana State Police, Mr. Peevler  
13 continued his commitment to public service  
14 working with Indiana Department of Revenue, and  
15 joined the Indiana Gaming Commission in 2005  
16 serving in numerous capacities.

17 Myself, I came to the Indiana Gaming  
18 Commission in 2006 and began this career as an  
19 IGC enforcement agent and promoted to supervisor  
20 for Hollywood and Rising Star Casinos. In 2017 I  
21 was chosen to serve as a field investigator for  
22 the southeast area and join the Gaming Integrity  
23 Division in 2021. Prior to this, I was a deputy  
24 sheriff at the Jennings County Sheriff's Office.

25 The Gaming Integrity Division is tasked with

1 review of three significant areas. The AML/BSA  
2 compliance with both federal and State of Indiana  
3 laws and regulations, financial fraud criminal  
4 activity, and money laundering activity.

5 Casinos are considered financial  
6 institutions, and as such must be able to meet  
7 all the requirements from FinCEN and the IRS.  
8 Part of this is that the casinos are tasked to  
9 evaluate the size, location, dollar value, types  
10 of games offered, and complete customer analysis.  
11 This evaluation is known as the AML risk  
12 assessment.

13 The casino, based on their AML risk  
14 assessment, should create internal controls,  
15 policies, and procedures to mitigate the  
16 opportunities for money laundering and other  
17 financial crimes that can occur in Indiana  
18 casinos.

19 The GID conducts a yearly audit of these  
20 (inaudible). The purpose for the review is to  
21 identify the AML program's strength and  
22 weaknesses of the internal policies, procedures,  
23 and controls.

24 This process facilitates an open dialogue to  
25 ensure the GID is providing optimal feedback and

1 support with the priority in identifying the  
2 norms in the gaming industry.

3 The American Gaming Association is the  
4 leading gaming industry resource, provides  
5 guidance to the casino industry on how to  
6 mitigate bad actors from using casinos as a  
7 source for the demise, the source of funds, or to  
8 spend their proceeds from their dissident  
9 activities.

10 The American Gaming Association encourages  
11 strong and robust AML programs that meet or  
12 exceeds the IRS and FinCEN requirements. They  
13 have should have a place -- they should have a  
14 place in these five pillars for a successful AML  
15 program.

16 Designation of a dedicated compliance  
17 officer is a pillar. This should be a person  
18 with knowledge of casino reporting requirements  
19 and understands the regulations for implementing  
20 and enforcing the AML compliance program.

21 Second pillar, written internal policies and  
22 procedures and controls. These need to meet the  
23 American Gaming Association, IRS, and FinCEN  
24 laws, rules, and guidelines. The policies should  
25 be well written so they can be easily implemented



1 and followed.

2 The third pillar, ongoing training for  
3 employees. Training should start with employees  
4 from day one. The ongoing training will  
5 reinforce the importance.

6 Pillar number four, independent review. The  
7 internal audit at the casinos will review the  
8 work well along with the scheduled reviews when  
9 the new products are brought to market and when  
10 inefficiencies are identified.

11 And the last pillar is customer due  
12 diligence. A know-your-customer program and  
13 enhanced due diligence that encourage all  
14 available sources to be looked into before making  
15 a final assessment.

16 Why is this important? We want to avoid  
17 headlines like these. These casinos do not want  
18 to be used as cover for criminal activity.  
19 Headlines like these can create a loss in public  
20 trust. Prosecutors and law enforcements -- and  
21 law enforcement have told us they do not want to  
22 have these types of activities in their  
23 jurisdictions.

24 Now I want to share some examples of  
25 criminal investigations that the Gaming Integrity

1 has conducted or assisted with.

2           Investigations allow the Gaming Integrity  
3 Division to work closely with state agencies like  
4 the Indiana Department of Revenue, local police  
5 departments and sheriff's office, as well as  
6 federal agencies like the FBI, IRS, and DEA, and  
7 others to identify bad actors who want to use  
8 Indiana casinos as a source to conduct criminal  
9 activity or launder the proceeds of the criminal  
10 activity. These are just a few examples.

11           We have financial fraud, which involves  
12 check fraud, identity theft, credit and debit  
13 card theft. Embezzlement. We had a case  
14 involving a residential care unit where a person  
15 stole just under \$50,000 so they could support  
16 their problem gaming. Same thing with family  
17 business, embezzlement. A family member who was  
18 part of the owners, also without the others  
19 knowing, was taking money so they could support  
20 their problem gaming.

21           We've also had investigations involving  
22 human trafficking and human smuggling, and also  
23 tied into illicit massage businesses that take  
24 these young ladies from other countries and have  
25 them work there.

1           We've identified transnational money  
2           laundering organizations, Hawala, which is  
3           basically a privatized banking system that  
4           certain cultures use as a way to handle their  
5           finances so they can send money back home without  
6           identifying the money either leaving the United  
7           States or being received in their countries.

8           And then, of course, we have the -- probably  
9           the most well known is narcotics trafficking,  
10          which we have had cases that have involved  
11          marijuana, fentanyl, and methamphetamine. And  
12          the strongest consideration to all these crimes  
13          is that there's always going to be a victim  
14          associated to these crimes.

15          Now I want to walk you through a few case  
16          investigations that occurred at Indiana casinos.  
17          In this case we have a person who brings in over  
18          \$260,000 in cash, most of them 20s. This cash  
19          was brought in gym bags and backpacks, and they  
20          go ahead and buy chips like they're going to go  
21          play their table games. They sit there for about  
22          45 minutes, and then return to the cage to cash  
23          in the chips, but in this case they ask for a  
24          check, and they ask for a check to be made out to  
25          another person.

1           So questions were asked, why would they ask  
2 for a check? Are they trying to legitimize their  
3 source of funds? The investigation found that  
4 this group was involved in illicit massage  
5 businesses and possible nexus to human  
6 trafficking.

7           In this next investigation, a patron was  
8 observed near surveillance with large cash,  
9 again, mostly 20s, totaling over \$40,000, had  
10 minimum game activity, and cashes out more than  
11 they brought in. When they cashed out, they also  
12 requested only \$100 bills.

13           This similar activity was documented on  
14 three different events by the same person. So,  
15 again, push the rules, where did the extra chips  
16 come from? Was this from previous play?

17           Well, our law enforcement friends with the  
18 DEA and other law enforcement agencies tell us  
19 that chips are known source of drug trafficking  
20 currency because they can easily be cashed just  
21 by showing up at the casino. When completing a  
22 review of this information, it was discovered  
23 this person provided different identifying  
24 information during the three events.

25           And the last one is a record search of

1 sports wagering transactions by a Mr. DC from  
2 numerous sports wagering transaction totaling  
3 just over \$2.7 million at several southern  
4 Indiana casinos. The sports wagers ranged from  
5 in amounts of a few hundred dollars to \$160,000  
6 in cash, and as due diligence was applied here,  
7 they asked for tax returns. Mr. DC provided tax  
8 records that indicated that he had \$34,000 in  
9 sales from a small business. However, his first  
10 wager was \$94,000. He lost that one. Came back  
11 three days later with \$135,000.

12 The investigation by local and federal law  
13 enforcement found that Mr. DC was involved in  
14 drug trafficking activity, and Mr. DC was later  
15 convicting for drug trafficking and money  
16 laundering by the IRS. He was sentenced to seven  
17 years and nine months.

18 Before that one, back in 2015 and 2016, a  
19 gentleman by the name of Mr. DW spent over  
20 \$4.2 million of which \$3.5 million was spent in  
21 cash casino purchases. Again, this person was  
22 found to be involved in drug activity. Mr. DW  
23 was later convicted for drug trafficking and  
24 money laundering and sentenced to 34 years.

25 The ultimate investigative goal of these

1 comprehensive, integrated, and parallel financial  
2 investigations is to gather all applicable  
3 information and present potential criminal  
4 activity cases to local prosecutors, law  
5 enforcement agencies, and federal authorities for  
6 criminal prosecution or to assistance those  
7 entities with their own investigations. And this  
8 endeavor creating working relationships with the  
9 Indiana county prosecutors, local law  
10 enforcement, state and federal agencies.

11 The Gaming Integrity Division also works  
12 with the IGC enforcement agents and investigators  
13 with comprehensive criminal investigations of  
14 major violaters or investigations involving  
15 several properties and assisting as a liaison  
16 with federal and state agencies.

17 In conclusion, gaming integrity is committed  
18 to protecting Indiana casinos, the communities  
19 where they operate, and the public from bad  
20 actors and the criminal activities by working in  
21 partnership with casinos, and together gain  
22 knowledge, explore new technologies, and promote  
23 continuous improvement to promote confidence and  
24 trust with the gaming industry in Indiana.

25 I thank you for your time, and I appreciate

1 the opportunity to present the Gaming Integrity  
2 Division.

3 CHAIRMAN THOMPSON: Mr. Becker, thank you so  
4 much for the presentation. It's eye opening.  
5 But it's -- you and your work and your staff's  
6 work which allows me to rely upon our staff  
7 recommendations and how it is we operate in terms  
8 of our due share of the responsibility.

9 I asked them first day I stepped in the room  
10 with them, I said I don't want to read those  
11 newspaper headlines and -- not on our watch. I  
12 want to know that they are exposed, and we want  
13 to know the information before that. Isn't that  
14 true?

15 DEPUTY DIRECTOR RESKE: True.

16 CHAIRMAN THOMPSON: That's exactly what I  
17 asked them. Thank you for your work.

18 Commissioners, any other questions? This is  
19 eye-opening stuff; right? Fire away.

20 COMMISSIONER WILLIAMS: I have a question,  
21 and thank you again for your services in  
22 identifying these issues.

23 I have a question on when you identify a  
24 problem like this where people are obviously  
25 laundering money, run me briefly through the

1 processes that -- where you or the Commission  
2 contacts law enforcement.

3 MR. BECKER: First, we start out with our  
4 due diligence to try to figure out if we have to  
5 even contact law enforcement. We try to find out  
6 if this person has the means to have this kind of  
7 gaming activity.

8 It's only when we -- when we've actually  
9 come to the conclusion or pretty much a  
10 reasonable conclusion that this person probably  
11 doesn't have those kind of means for that kind of  
12 wagering activity, then we make open source  
13 investigation. You know, we may look at, you  
14 know, where they have worked, things like that.  
15 We may even contact local law enforcement to say,  
16 hey, what do you know about Manny Becker? Is he  
17 a guy -- you know, and sometimes, honestly,  
18 they'll say oh, you mean the guy that picks up,  
19 you know -- you know, used stoves and water  
20 heaters on the side of the road? The guy that's  
21 picking up his water heaters just played \$30,000  
22 this weekend on football. So we start looking at  
23 things like that.

24 And then once we start working with our law  
25 enforcement partners, whether it's dependent on



1           how we see things, we may reach out to just the  
2           IRS. We may reach out to the DEA if a person has  
3           known previous drug activity, things like that,  
4           then we'll be -- you know, we just kind of work  
5           together as a group, and then we determine what  
6           investigative avenues need to be followed.

7           COMMISSIONER WILLIAMS: Thank you.

8           MR. BECKER: I hope I answered your  
9           question.

10          CHAIRMAN THOMPSON: Questions,  
11          Commissioners?

12          Mr. Becker, you know, integrity is easy to  
13          say, not always so easy to prove.

14          MR. BECKER: Yes, sir.

15          CHAIRMAN THOMPSON: Thank you very much for  
16          your work again.

17          MR. BECKER: Thank you very much for the  
18          time and opportunity.

19          CHAIRMAN THOMPSON: Commissioners, anything  
20          else on our agenda today? We will dispense with  
21          old and new business.

22          Mr. Director, deputy director, anything else  
23          that you have on your agenda?

24          Then we're going to at 11:50 declare this  
25          meeting adjourned, and we'll reconvene on the

1 19th of December. My goodness. We're already  
2 talking December calendar. That's a little  
3 unnerving. This meeting is adjourned.

4 (END OF PROCEEDINGS AT 11:50 A.M.)

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STATE OF INDIANA     )  
                                  ) SS:  
COUNTY OF HAMILTON )

I, Tonya Esparza, a Notary Public and  
Stenographic Reporter, in and for the County of  
Hamilton, State of Indiana, do hereby certify  
that on the 26th day of September, 2024, I took  
down in stenographic notes the foregoing hearing;  
and that the transcript is a full, true, and  
correct transcript made from my stenographic  
notes.

---

Tonya Esparza  
Notary Public  
Registered Professional Reporter

Commission Number:  
NP0699809

My Commission Expires:  
May 23, 2025

	<b>accomplishments (1)</b> 6:3	<b>advisor (1)</b> 8:2	45:5	<b>artist (1)</b> 10:3
<b>\$</b>	<b>accordance (2)</b> 33:17,24	<b>affairs (1)</b> 11:25	<b>analysis (2)</b> 33:22;39:10	<b>arts (1)</b> 10:1
<b>\$10,564 (1)</b> 24:18	<b>Accordingly (1)</b> 30:2	<b>affect (2)</b> 21:5;22:19	<b>analyst (1)</b> 11:13	<b>assessed (1)</b> 30:18
<b>\$100 (1)</b> 44:12	<b>account (3)</b> 24:5,12,15	<b>again (6)</b> 33:7;44:9,15; 45:21;47:21;49:16	<b>analyze (1)</b> 37:10	<b>assessment (4)</b> 36:10;39:12,14; 41:15
<b>\$11,976.09 (1)</b> 24:7	<b>accuracy (1)</b> 25:2	<b>against (1)</b> 23:22	<b>and/or (1)</b> 26:10	<b>assignments (1)</b> 38:7
<b>\$13,659.56 (1)</b> 24:7	<b>Aces (1)</b> 15:7	<b>agencies (7)</b> 29:7;42:3,6;44:18; 46:5,10,16	<b>announce (1)</b> 9:16	<b>assistance (1)</b> 46:6
<b>\$135,000 (1)</b> 45:11	<b>acknowledge (2)</b> 5:25;9:14	<b>agency (3)</b> 8:22;31:11;32:5	<b>annual (1)</b> 36:13	<b>assistant (4)</b> 9:19;10:10,22;22:7
<b>\$160,000 (1)</b> 45:5	<b>acknowledgement (1)</b> 24:22	<b>agenda (5)</b> 12:21;13:15;15:16; 49:20,23	<b>answered (1)</b> 49:8	<b>assisted (1)</b> 42:1
<b>\$2,054.05 (1)</b> 24:8	<b>Acquisition (2)</b> 17:1,11	<b>agent (1)</b> 38:19	<b>apologize (1)</b> 4:2	<b>assisting (3)</b> 9:23;10:12;46:15
<b>\$2.7 (1)</b> 45:3	<b>Act (2)</b> 12:25;33:14	<b>agents (1)</b> 46:12	<b>applicant (1)</b> 22:15	<b>associated (1)</b> 43:14
<b>\$260,000 (1)</b> 43:18	<b>action (2)</b> 23:22;27:11	<b>ago (1)</b> 11:2	<b>applicants (5)</b> 21:3,6,12;26:9,13	<b>Associates (1)</b> 15:11
<b>\$3,734.25 (1)</b> 24:6	<b>actions (3)</b> 13:13,18;23:18	<b>agree (1)</b> 27:13	<b>application (2)</b> 22:16;26:14	<b>Association (3)</b> 40:3,10,23
<b>\$3.5 (1)</b> 45:20	<b>active (2)</b> 10:6;24:11	<b>agreed (2)</b> 25:3;27:18	<b>applications (3)</b> 11:13;26:8,19	<b>attendance (1)</b> 10:23
<b>\$30,000 (1)</b> 48:21	<b>activities (4)</b> 37:13;40:9;41:22; 46:20	<b>agreement (6)</b> 23:21,24;24:21; 25:5,7;27:13	<b>applied (1)</b> 45:6	<b>attention (2)</b> 12:21;30:8
<b>\$34,000 (1)</b> 45:8	<b>activity (14)</b> 24:3;39:4,4;41:18; 42:9,10;44:10,13; 45:14,22;46:4;48:7, 12;49:3	<b>agreements (3)</b> 27:9,19,23	<b>appointment (1)</b> 6:21	<b>attorney (9)</b> 7:9;14:18;15:25; 16:6,8,15;25:25; 28:22;32:1
<b>\$4.2 (1)</b> 45:20	<b>actors (3)</b> 40:6;42:7;46:20	<b>AGS (1)</b> 15:11	<b>appreciate (2)</b> 9:12;46:25	<b>attorneys (1)</b> 36:13
<b>\$40,000 (1)</b> 44:9	<b>actually (2)</b> 28:17;48:8	<b>ahead (1)</b> 43:20	<b>appropriate (1)</b> 37:11	<b>audit (2)</b> 39:19;41:7
<b>\$5,000 (1)</b> 18:22	<b>added (1)</b> 12:12	<b>allow (2)</b> 6:6;42:2	<b>approval (11)</b> 5:4;16:5;32:2,3,7; 33:12;34:1,2,8,18; 35:5	<b>August (1)</b> 11:13
<b>\$5,469.51 (1)</b> 24:20	<b>addition (2)</b> 6:13;33:14	<b>allowing (1)</b> 20:24	<b>approvals (2)</b> 16:2;34:22	<b>authorities (1)</b> 46:5
<b>\$50,000 (3)</b> 16:21;17:23;42:15	<b>Additionally (1)</b> 24:9	<b>allows (1)</b> 47:6	<b>approve (10)</b> 5:8,11,15;19:13; 21:19;23:7;26:23; 28:4;32:20;35:1	<b>authority (3)</b> 16:20;20:23;33:18
<b>\$54,000 (1)</b> 25:4	<b>additions (1)</b> 5:7	<b>Along (13)</b> 9:22;10:2,11;15:1, 4;16:21,23;17:22,25; 18:22,24;21:3;41:8	<b>approved (5)</b> 15:24;30:3;31:8, 24;33:5	<b>automatic (1)</b> 24:25
<b>\$7500 (1)</b> 15:2	<b>addressed (1)</b> 31:16	<b>always (3)</b> 7:1;43:13;49:13	<b>Approving (10)</b> 15:12;16:13,15; 17:17;18:15;19:4; 21:10;22:22;26:18; 27:22	<b>available (3)</b> 25:7;31:18;41:14
<b>\$94,000 (1)</b> 45:10	<b>adjourned (2)</b> 49:25;50:3	<b>American (6)</b> 18:2,10,12;40:3,10, 23	<b>April (1)</b> 31:10	<b>avenues (1)</b> 49:6
<b>[</b>	<b>administration (4)</b> 6:22;10:2,15;11:1	<b>Ameristar (2)</b> 16:25;18:8	<b>architect (1)</b> 8:18	<b>avoid (1)</b> 41:16
<b>[phonetic] (2)</b> 10:7;11:7	<b>administrative (5)</b> 9:24;10:13;29:17, 20;30:9	<b>AML (6)</b> 39:11,13,21;40:11, 14,20	<b>area (3)</b> 11:2;36:16;38:22	<b>award (1)</b> 35:23
<b>A</b>	<b>adopt (1)</b> 29:7	<b>AML/BSA (2)</b> 36:14;39:1	<b>areas (1)</b> 39:1	<b>awarded (1)</b> 35:22
<b>abbreviated (1)</b> 13:14	<b>adopted (1)</b> 29:20	<b>amount (4)</b> 7:18;24:17,18,19	<b>articulated (1)</b> 34:5	<b>away (1)</b> 47:19
<b>ability (1)</b> 36:3	<b>adopting (1)</b> 32:9	<b>amounts (1)</b>		<b>aye (9)</b> 5:17;19:19;21:25; 23:13;25:20;27:3; 28:9;33:2;35:8
<b>able (3)</b> 6:14;28:18;39:6	<b>advised (1)</b> 7:15			<b>eyes (10)</b> 5:18,19;19:20;
<b>above (1)</b> 13:1				
<b>accept (1)</b> 29:11				

22:1;23:15;25:21; 27:4;28:10;33:3;35:9 <b>Aztar (1)</b> 17:7	<b>betting (1)</b> 20:15 <b>beyond (1)</b> 13:2 <b>Biddle (1)</b> 10:21 <b>Bill (1)</b> 38:9 <b>bills (1)</b> 44:12 <b>bit (2)</b> 8:19;28:16 <b>Blue (8)</b> 15:18,20,25;16:9, 16;17:5,6;18:5 <b>board (3)</b> 7:10,13,16 <b>both (4)</b> 7:3,8;8:4;39:2 <b>Brady (1)</b> 38:3 <b>branch (2)</b> 28:20,21 <b>brief (2)</b> 37:21,22 <b>briefly (1)</b> 47:25 <b>bring (2)</b> 12:20;36:5 <b>brings (1)</b> 43:17 <b>brought (4)</b> 31:3;41:9;43:19; 44:11 <b>Brown (7)</b> 12:9;19:25;20:3,7; 21:15;22:4,6 <b>BSA/AML (1)</b> 37:15 <b>budget (2)</b> 31:3,8 <b>build (1)</b> 36:3 <b>building (1)</b> 11:5 <b>business (36)</b> 10:2;11:1;12:11; 14:10,12,12,13,13,14, 15,15;15:8;17:1,3,4, 6,8,10,11,13,14,16; 18:3,5,6,7,9,11,13; 19:1;20:24;22:24; 23:23;42:17;45:9; 49:21 <b>businesses (2)</b> 42:23;44:5 <b>buy (1)</b> 43:20	11,13,14;33:11,15, 25;34:11,14 <b>cage (1)</b> 43:22 <b>calendar (1)</b> 50:2 <b>call (3)</b> 4:8,11,11 <b>called (1)</b> 7:12 <b>came (3)</b> 38:5,17;45:10 <b>can (7)</b> 11:4;20:5;39:17; 40:25;41:19;43:5; 44:20 <b>capacities (1)</b> 38:16 <b>Capital (1)</b> 15:10 <b>card (1)</b> 42:13 <b>care (1)</b> 42:14 <b>career (2)</b> 11:24;38:18 <b>Carla (4)</b> 10:7,12,14,15 <b>Carlisle (1)</b> 11:20 <b>carries (7)</b> 19:22;22:3;23:17; 25:23;27:6;28:12; 35:11 <b>case (6)</b> 36:8;37:25;42:13; 43:15,17,23 <b>cases (2)</b> 43:10;46:4 <b>cash (6)</b> 43:18,18,22;44:8; 45:6,21 <b>cashd (2)</b> 44:11,20 <b>cashes (1)</b> 44:10 <b>casino (15)</b> 6:10,12,12;15:19; 16:3;17:6,16;20:24; 33:8,11;39:13;40:5, 18;44:21;45:21 <b>casinos (18)</b> 6:6;12:16;16:4; 30:13;37:10,19; 38:20;39:5,8,18; 40:6;41:7,17;42:8; 43:16;45:4;46:18,21 <b>CDITH (2)</b> 17:15;20:23 <b>celebrate (1)</b> 29:4 <b>Centaur (2)</b> 16:25;17:11	<b>certain (4)</b> 30:18;31:16;34:15; 43:4 <b>certificate (3)</b> 16:20,22;20:23 <b>certificates (1)</b> 17:18 <b>certify (1)</b> 51:5 <b>Chair (5)</b> 5:23;8:11;25:9; 28:24;35:18 <b>CHAIRMAN (49)</b> 4:1,11,14,15;5:2, 12,14;7:7;9:9;13:20, 21;14:9;19:8,14,16; 20:5;21:14,20,22; 22:5;23:3,8,11;25:10, 15,17;26:4,20,24; 27:1,25;28:5,7,14; 29:1,11;32:14,21,24; 34:21;35:2,4,14; 36:22;47:3,16;49:10, 15,19 <b>changes (2)</b> 30:4;31:17 <b>Chapter (1)</b> 29:21 <b>Charity (3)</b> 9:18,23;30:14 <b>chart (2)</b> 37:20;38:2 <b>check (4)</b> 42:12;43:24,24; 44:2 <b>Chicago (1)</b> 16:25 <b>Chip (7)</b> 15:18,20,25;16:9, 16;17:5;18:5 <b>chips (4)</b> 43:20,23;44:15,19 <b>Chorus (9)</b> 5:18;19:20;22:1; 23:15;25:21;27:4; 28:10;33:3;35:9 <b>chosen (1)</b> 38:21 <b>Chris (1)</b> 28:22 <b>Cities (1)</b> 7:13 <b>City (1)</b> 7:23 <b>civil (1)</b> 31:5 <b>Clarksville (1)</b> 17:12 <b>clerical (2)</b> 9:19;10:10 <b>close (1)</b> 34:14 <b>closely (1)</b>	42:3 <b>Code (8)</b> 14:24;16:19;17:21; 18:19;29:21;30:17; 31:5,21 <b>coming (1)</b> 29:19 <b>commenced (1)</b> 13:7 <b>comment (7)</b> 13:3,7,9;30:1; 31:11,19,23 <b>comments (7)</b> 5:16;29:3;31:15, 16,18,21,22 <b>Commission (37)</b> 4:8;6:4,20,25;7:2; 8:1;12:12,18;15:24; 16:7,12;21:1,4,8; 22:17;26:17;27:9,11; 29:24;30:19,25;31:2, 8,14,25,25;32:7,12; 33:21;34:11,19;37:5; 38:15,18;48:1; 51:16,5,18 <b>Commissioner (30)</b> 4:16,18,19,21,22, 24;5:10,13;6:18,20, 24,25;19:12,15; 21:18,21;23:7,10; 25:14,16;26:22,25; 28:3,6;32:19,23; 34:25;35:3;47:20; 49:7 <b>Commissioners (21)</b> 5:5;7:3;13:12; 14:10,21;19:9;20:8; 21:15;22:11;23:19; 26:3,6;29:15;32:14; 33:9,22;35:21;37:3; 47:18;49:11,19 <b>Commission's (5)</b> 12:19;16:5;25:8; 33:18;36:18 <b>commitment (1)</b> 38:13 <b>committed (1)</b> 46:17 <b>committee (1)</b> 31:4 <b>communities (1)</b> 46:18 <b>Community (1)</b> 10:4 <b>Company (3)</b> 17:2,8,9 <b>competitive (1)</b> 6:10 <b>complete (2)</b> 26:9;39:10 <b>completed (4)</b> 12:6;13:1;29:25; 30:23
<b>B</b>				
<b>bachelor (1)</b> 10:1 <b>bachelor's (2)</b> 10:19,24 <b>back (8)</b> 4:4,10;7:17,22; 11:8;43:5;45:10,18 <b>background (4)</b> 19:25;21:1;22:17; 37:21 <b>backpacks (1)</b> 43:19 <b>bad (3)</b> 40:6;42:7;46:19 <b>bags (1)</b> 43:19 <b>Bally's (1)</b> 17:9 <b>banking (1)</b> 43:3 <b>baseball (2)</b> 7:10,12 <b>based (2)</b> 6:21;39:13 <b>basically (1)</b> 43:3 <b>Becker (13)</b> 35:20,22;36:1,11; 37:1,4;47:3;48:3,16; 49:8,12,14,17 <b>began (1)</b> 38:18 <b>begin (2)</b> 37:7,20 <b>beginning (1)</b> 30:25 <b>behalf (1)</b> 37:6 <b>Belterra (6)</b> 15:20;16:1,10,16; 17:7;18:7 <b>Belterra's (1)</b> 15:19 <b>best (4)</b> 6:17;7:6,25;13:16 <b>Bet365 (1)</b> 20:19 <b>Betfair (2)</b> 18:4,5 <b>BetMGM (1)</b> 12:7 <b>BetRivers (5)</b> 18:9;23:23,25; 24:4,10 <b>BetRivers's (1)</b> 24:22	<b>Caesars (13)</b> 17:4,10,11,14;18:3,	<b>C</b>		

<b>completing (2)</b> 10:19;44:21	26:16;27:20;33:18; 34:2,3	<b>culture (1)</b> 36:19	<b>department (6)</b> 11:8,11;36:9;38:6, 14;42:4	<b>dispense (1)</b> 49:20
<b>complex (1)</b> 36:2	<b>continue (1)</b> 29:14	<b>cultures (1)</b> 43:4	<b>departments (1)</b> 42:5	<b>dissident (1)</b> 40:8
<b>compliance (9)</b> 10:21;12:24;15:8, 9;34:12;37:15;39:2; 40:16,20	<b>continued (2)</b> 8:6;38:13	<b>currency (1)</b> 44:20	<b>dependent (1)</b> 48:25	<b>Division (15)</b> 9:2,18,23;10:21; 11:20;12:6;35:19; 37:6;38:3,4,23,25; 42:3;46:11;47:2
<b>components (1)</b> 37:18	<b>continues (1)</b> 10:5	<b>currently (1)</b> 12:1	<b>deposited (3)</b> 24:6,15,18	<b>divisions (1)</b> 10:13
<b>comprehensive (2)</b> 46:1,13	<b>continuous (1)</b> 46:23	<b>customer (3)</b> 10:14;39:10;41:11	<b>deputy (5)</b> 7:23;8:14;38:23; 47:15;49:22	<b>documentation (2)</b> 34:6,10
<b>concern (1)</b> 27:8	<b>contribute (1)</b> 11:5	<b>D</b>	<b>derogatory (2)</b> 21:5;22:19	<b>documented (1)</b> 44:13
<b>concerning (4)</b> 23:22;26:1,7;33:10	<b>contributed (1)</b> 7:1	<b>dais (1)</b> 5:24	<b>Designation (1)</b> 40:16	<b>documents (1)</b> 21:8
<b>concerns (1)</b> 29:17	<b>contributions (1)</b> 6:2	<b>Dan (1)</b> 25:10	<b>desk (2)</b> 9:21;10:11	<b>dollar (2)</b> 36:5;39:9
<b>concludes (2)</b> 13:20;25:9	<b>controls (3)</b> 39:14,23;40:22	<b>dash (1)</b> 34:13	<b>Detailed (2)</b> 26:15;27:19	<b>dollars (1)</b> 45:5
<b>conclusion (3)</b> 46:17;48:9,10	<b>conversations (1)</b> 8:13	<b>data (1)</b> 25:2	<b>details (2)</b> 25:4;33:20	<b>down (2)</b> 6:23;51:7
<b>concurrently (1)</b> 16:6	<b>convicted (1)</b> 45:23	<b>date (1)</b> 34:16	<b>deter (1)</b> 37:12	<b>DraftKings (1)</b> 18:8
<b>condition (1)</b> 34:3	<b>convicting (1)</b> 45:15	<b>dated (1)</b> 24:13	<b>determine (1)</b> 49:5	<b>drug (6)</b> 44:19;45:14,15,22, 23;49:3
<b>conditions (1)</b> 34:4	<b>conviction (1)</b> 26:10	<b>day (3)</b> 41:4;47:9;51:6	<b>determined (2)</b> 24:2,10	<b>Dudich (3)</b> 6:19,20;7:22
<b>conduct (2)</b> 37:11;42:8	<b>Cook (1)</b> 36:23	<b>days (4)</b> 24:5,13;27:16; 45:11	<b>Development (1)</b> 11:11	<b>due (5)</b> 41:11,13;45:6; 47:8;48:4
<b>conducted (3)</b> 21:1;22:17;42:1	<b>corrections (1)</b> 5:7	<b>DC (4)</b> 45:1,7,13,14	<b>dialogue (2)</b> 13:6;39:24	<b>during (5)</b> 6:4;7:2;31:22; 35:25;44:24
<b>conducting (1)</b> 36:2	<b>counsel (3)</b> 8:9,12;36:13	<b>DEA (3)</b> 42:6;44:18;49:2	<b>differ (1)</b> 34:6	<b>duties (3)</b> 9:24;10:12,13
<b>conducts (1)</b> 39:19	<b>countries (2)</b> 42:24;43:7	<b>debit (1)</b> 42:12	<b>different (3)</b> 20:11;44:14,23	<b>DW (2)</b> 45:19,22
<b>conference (1)</b> 36:14	<b>County (4)</b> 38:24;46:9;51:2,4	<b>decade (1)</b> 6:11	<b>Digital (1)</b> 15:10	<b>E</b>
<b>confidence (1)</b> 46:23	<b>couple (1)</b> 12:20	<b>December (4)</b> 13:19;31:2;50:1,2	<b>diligence (4)</b> 41:12,13;45:6;48:4	<b>earned (2)</b> 10:1;36:15
<b>confidential (8)</b> 12:8;21:8;22:21; 26:17;27:21;32:15; 33:20,23	<b>course (3)</b> 24:5,13;43:8	<b>decided (2)</b> 11:23;12:2	<b>direction (1)</b> 34:20	<b>easily (2)</b> 40:25;44:20
<b>confirm (1)</b> 25:1	<b>cover (1)</b> 41:18	<b>decision (1)</b> 13:15	<b>DIRECTOR (29)</b> 4:10,12,13,16,19, 22,25;5:21,22;6:1,9; 8:14;9:7,11;10:9,22; 13:22;14:2;19:24; 22:7;25:11;28:16,24; 29:2;35:17;38:4; 47:15;49:22,22	<b>East (1)</b> 16:25
<b>congratulations (1)</b> 29:12	<b>Covering (2)</b> 9:21;10:11	<b>declare (1)</b> 49:24	<b>directors (4)</b> 7:10,13,16;12:9	<b>easy (2)</b> 49:12,13
<b>consider (2)</b> 5:4,8	<b>create (2)</b> 39:14;41:19	<b>dedicated (1)</b> 40:16	<b>disciplinary (6)</b> 13:13,14,18;23:18, 22;27:11	<b>EDF (1)</b> 15:7
<b>considerable (1)</b> 7:18	<b>created (1)</b> 8:1	<b>dedication (1)</b> 36:19	<b>disclose (1)</b> 26:9	<b>edits (1)</b> 30:5
<b>consideration (3)</b> 26:14;34:19;43:12	<b>creating (2)</b> 6:5;46:8	<b>degree (3)</b> 10:19,25;11:22	<b>discovered (1)</b> 44:22	<b>effect (9)</b> 15:13;16:14;17:18; 18:16;19:5;26:19; 27:23;29:23;32:9
<b>considered (1)</b> 39:5	<b>credit (1)</b> 42:12	<b>Delta (1)</b> 10:5	<b>discussion (9)</b> 5:16;19:17;21:23; 23:12;25:18;28:8; 32:25;35:6;37:23	<b>effectiveness (1)</b> 36:1
<b>consulting (1)</b> 7:24	<b>crimes (4)</b> 37:12;39:17;43:12, 14	<b>demise (1)</b> 40:7		<b>efforts (1)</b> 36:5
<b>contact (2)</b> 48:5,15	<b>criminal (10)</b> 26:10;39:3;41:18, 25;42:8,9;46:3,6,13, 20	<b>demonstrating (1)</b> 34:12		
<b>contacts (1)</b> 48:2	<b>crimial (10)</b> 26:10;39:3;41:18, 25;42:8,9;46:3,6,13, 20	<b>Dennis (6)</b> 4:12;8:7,8,17;9:4; 30:23		
<b>contained (5)</b>	<b>Crown (1)</b> 18:7	<b>denying (1)</b> 26:19		
	<b>CSI (1)</b> 17:9			

<p><b>either (1)</b> 43:6</p> <p><b>else (2)</b> 49:20,22</p> <p><b>Embezzlement (2)</b> 42:13,17</p> <p><b>employees (2)</b> 41:3,3</p> <p><b>encourage (1)</b> 41:13</p> <p><b>encourages (1)</b> 40:10</p> <p><b>END (1)</b> 50:4</p> <p><b>endeavor (1)</b> 46:8</p> <p><b>endeavors (1)</b> 7:6</p> <p><b>enforcement (13)</b> 38:10,19;41:21; 44:17,18;45:13;46:5, 10,12;48:2,5,15,25</p> <p><b>enforcements (1)</b> 41:20</p> <p><b>enforcing (1)</b> 40:20</p> <p><b>enhanced (1)</b> 41:13</p> <p><b>enjoys (1)</b> 11:15</p> <p><b>Enrolled (1)</b> 12:25</p> <p><b>ensure (1)</b> 39:25</p> <p><b>ensuring (1)</b> 37:14</p> <p><b>Entertainment (1)</b> 33:11</p> <p><b>entities (3)</b> 20:12;32:11;46:7</p> <p><b>environment (1)</b> 11:6</p> <p><b>errors (1)</b> 24:22</p> <p><b>Esparza (2)</b> 51:3,14</p> <p><b>established (2)</b> 5:3;26:11</p> <p><b>evaluate (1)</b> 39:9</p> <p><b>evaluation (1)</b> 39:11</p> <p><b>Evansville (1)</b> 17:9</p> <p><b>even (2)</b> 48:5,15</p> <p><b>events (2)</b> 44:14,24</p> <p><b>Everi (1)</b> 15:9</p> <p><b>exactly (1)</b> 47:16</p> <p><b>examples (3)</b></p>	<p>38:1;41:24;42:10</p> <p><b>exceeds (1)</b> 40:12</p> <p><b>excellence (1)</b> 35:23</p> <p><b>excellent (1)</b> 36:15</p> <p><b>excited (1)</b> 11:3</p> <p><b>excluded (2)</b> 24:3,25</p> <p><b>exclusion (4)</b> 12:13;24:11,17; 25:2</p> <p><b>Exclusions (1)</b> 12:11</p> <p><b>excuse (2)</b> 10:9;12:16</p> <p><b>EXECUTIVE (26)</b> 4:10,12,13,16,19, 22,25;5:21,22;6:1,9; 9:7,11;10:9;13:21; 14:2,21;20:8;22:12; 23:20;26:5;28:20,24; 29:2;35:17;37:3</p> <p><b>existing (1)</b> 16:11</p> <p><b>expeditiously (1)</b> 36:2</p> <p><b>experience (2)</b> 10:14;38:10</p> <p><b>experienced (1)</b> 8:10</p> <p><b>experiences (1)</b> 7:7</p> <p><b>expertise (2)</b> 11:14;36:15</p> <p><b>expire (2)</b> 29:18,21</p> <p><b>expired (1)</b> 16:2</p> <p><b>Expires (1)</b> 51:18</p> <p><b>explore (1)</b> 46:22</p> <p><b>exposed (1)</b> 47:12</p> <p><b>extern (1)</b> 11:19</p> <p><b>extra (1)</b> 44:15</p> <p><b>eye (1)</b> 47:4</p> <p><b>eye-opening (1)</b> 47:19</p>	<p>29:5</p> <p><b>failed (3)</b> 26:9,11,15</p> <p><b>family (2)</b> 42:16,17</p> <p><b>FanDuel (2)</b> 18:5,6</p> <p><b>fantasy (7)</b> 6:7;18:21;19:2; 22:14,23,25;30:13</p> <p><b>far (1)</b> 11:3</p> <p><b>favor (9)</b> 5:17;19:18;21:24; 23:13;25:19;27:2; 28:9;33:1;35:7</p> <p><b>FBI (1)</b> 42:6</p> <p><b>February (3)</b> 24:9,13,14</p> <p><b>federal (8)</b> 37:15,23;39:2; 42:6;45:12;46:5,10, 16</p> <p><b>fee (5)</b> 15:2,22;16:21; 17:23;18:23</p> <p><b>feedback (2)</b> 13:5;39:25</p> <p><b>fees (4)</b> 22:16;30:12;31:5; 32:10</p> <p><b>felony (1)</b> 26:10</p> <p><b>fentanyl (1)</b> 43:11</p> <p><b>few (5)</b> 6:4;37:25;42:10; 43:15;45:5</p> <p><b>field (1)</b> 38:21</p> <p><b>fifth (1)</b> 29:22</p> <p><b>fighting (1)</b> 30:12</p> <p><b>figure (1)</b> 48:4</p> <p><b>filed (2)</b> 15:21;29:24</p> <p><b>filled (1)</b> 30:6</p> <p><b>final (10)</b> 21:7;22:20;30:5; 32:1,3,4,10;34:5,20; 41:15</p> <p><b>finally (5)</b> 11:17;12:20;18:18; 34:14;37:25</p> <p><b>finance (1)</b> 6:22</p> <p><b>finances (1)</b> 43:5</p> <p><b>financial (17)</b></p>	<p>8:3;21:2;22:18; 33:13,15,20;34:1,6,9, 15,18;37:12;39:3,5, 17;42:11;46:1</p> <p><b>FinCEN (3)</b> 39:7;40:12,23</p> <p><b>find (1)</b> 48:5</p> <p><b>finding (1)</b> 20:19</p> <p><b>fine (2)</b> 7:7;10:1</p> <p><b>finer (4)</b> 30:12,18;31:5; 32:10</p> <p><b>finish (1)</b> 9:5</p> <p><b>finished (1)</b> 20:6</p> <p><b>Fire (1)</b> 47:19</p> <p><b>firm (1)</b> 7:14</p> <p><b>first (13)</b> 5:23;6:9,10;9:17; 12:23;14:17,23; 31:11;34:5;37:1; 45:9;47:9;48:3</p> <p><b>five (2)</b> 7:1;40:14</p> <p><b>followed (2)</b> 41:1;49:6</p> <p><b>following (9)</b> 15:2;16:22;17:24; 18:23;24:16;25:8; 30:22;34:3,3</p> <p><b>fond (1)</b> 8:4</p> <p><b>football (1)</b> 48:22</p> <p><b>foregoing (1)</b> 51:7</p> <p><b>forgot (1)</b> 29:3</p> <p><b>formal (1)</b> 13:7</p> <p><b>Former (2)</b> 6:1;7:9</p> <p><b>formerly (1)</b> 24:25</p> <p><b>forward (3)</b> 10:18;34:23;36:21</p> <p><b>Foster (3)</b> 22:8,11;23:4</p> <p><b>found (5)</b> 21:4;22:18;44:3; 45:13,22</p> <p><b>Foundation (1)</b> 10:4</p> <p><b>foundations (1)</b> 8:16</p> <p><b>founded (1)</b> 7:11</p>	<p><b>four (1)</b> 41:6</p> <p><b>framework (2)</b> 6:5;29:6</p> <p><b>Frank (1)</b> 38:3</p> <p><b>Fraternity (1)</b> 10:5</p> <p><b>fraud (3)</b> 39:3;42:11,12</p> <p><b>French (2)</b> 17:6;18:10</p> <p><b>friends (1)</b> 44:17</p> <p><b>fulfilling (1)</b> 6:15</p> <p><b>full (2)</b> 8:25;51:8</p> <p><b>fundamentals (1)</b> 8:15</p> <p><b>funds (4)</b> 24:15,16;40:7;44:3</p> <p><b>further (1)</b> 35:6</p> <p><b>future (3)</b> 6:16;7:6;24:24</p>
<b>G</b>				
			<p><b>gain (1)</b> 46:21</p> <p><b>Galaxy (2)</b> 12:7;15:10</p> <p><b>gambling (1)</b> 8:17</p> <p><b>game (1)</b> 44:10</p> <p><b>Games (3)</b> 15:9;39:10;43:21</p> <p><b>Gaming (42)</b> 4:8;6:24;7:2;9:18, 23;12:4,7;15:6,7,10; 17:2,8;18:7;20:12, 14;30:14;35:19;37:6, 8,14,19,24;38:2,4,15, 17,22,25;40:2,3,4,10, 23;41:25;42:2,16,20; 46:11,17,24;47:1; 48:7</p> <p><b>Gamma (1)</b> 10:5</p> <p><b>Garth (1)</b> 19:25</p> <p><b>gather (1)</b> 46:2</p> <p><b>gave (1)</b> 34:22</p> <p><b>general (4)</b> 8:9,12;32:2;35:24</p> <p><b>gentleman (1)</b> 45:19</p> <p><b>Geocomply (1)</b> 15:5</p>	

<p><b>germane (1)</b> 7:20 <b>GID (2)</b> 39:19,25 <b>given (1)</b> 26:13 <b>gives (1)</b> 36:24 <b>glad (1)</b> 9:8 <b>Global (1)</b> 15:10 <b>GLP (1)</b> 15:9 <b>goal (1)</b> 45:25 <b>God (1)</b> 14:7 <b>Good (14)</b> 4:1;7:19;8:10,10; 14:20;20:2,7;22:10, 11,12;23:19;36:3,25; 37:3 <b>goodness (1)</b> 50:1 <b>govern (1)</b> 37:24 <b>government (1)</b> 10:16 <b>governor's (2)</b> 29:5;32:3 <b>graduate (2)</b> 9:25;10:23 <b>grant (6)</b> 6:11;20:13,18,22; 21:11;22:22 <b>granted (1)</b> 12:15 <b>granting (2)</b> 20:11;22:13 <b>great (1)</b> 11:6 <b>Greg (6)</b> 6:1,16;7:8,16;8:13, 20 <b>group (3)</b> 12:1;44:4;49:5 <b>groups (1)</b> 36:12 <b>grown (1)</b> 29:11 <b>guidance (1)</b> 40:5 <b>guidelines (1)</b> 40:24 <b>guy (3)</b> 48:17,18,20 <b>guys (1)</b> 8:8 <b>gym (1)</b> 43:19</p>	<p style="text-align: center;"><b>H</b></p> <p><b>HAMILTON (2)</b> 51:2,5 <b>Hammond (2)</b> 17:5;18:12 <b>handle (1)</b> 43:4 <b>happy (3)</b> 21:13;23:1;32:13 <b>harbor (1)</b> 30:17 <b>hard (1)</b> 29:13 <b>Harrah's (1)</b> 17:13 <b>Haute (3)</b> 6:12;17:16;20:24 <b>Haven (1)</b> 17:15 <b>Hawala (1)</b> 43:2 <b>headlines (3)</b> 41:17,19;47:11 <b>hear (1)</b> 28:16 <b>Hearing (15)</b> 5:16;14:12;19:18, 22:21;16,24;23:5,13; 28:12;31:12,20;33:1, 5;35:11;51:7 <b>hearings (2)</b> 31:14,23 <b>heaters (2)</b> 48:20,21 <b>Hebig (1)</b> 11:7 <b>held (2)</b> 29:5;31:14 <b>help (1)</b> 14:7 <b>helped (1)</b> 36:5 <b>hereby (2)</b> 14:4;51:5 <b>hey (1)</b> 48:16 <b>Hi (2)</b> 11:9,18 <b>high (1)</b> 36:24 <b>highlight (1)</b> 35:21 <b>Hill (11)</b> 4:17,18;5:13; 19:12;21:21;23:10; 25:14;26:25;28:3; 32:19;35:3 <b>hires (2)</b> 9:14,17 <b>history (1)</b> 26:10</p>	<p><b>holders (1)</b> 16:22 <b>Hollywood (2)</b> 17:3;38:20 <b>home (1)</b> 43:5 <b>honestly (1)</b> 48:17 <b>honored (1)</b> 36:1 <b>Hoosier (5)</b> 17:3,12,13,13;18:4 <b>hope (1)</b> 49:8 <b>Horseshoe (3)</b> 17:1,5;18:12 <b>House (2)</b> 11:24;12:25 <b>Housman (5)</b> 4:20,21;23:7; 25:16;32:23 <b>human (3)</b> 42:22,22;44:5 <b>hundred (1)</b> 45:5 <b>Huntington (1)</b> 10:24 <b>husband (1)</b> 11:16</p> <p style="text-align: center;"><b>I</b></p> <p><b>IAC (4)</b> 14:25;18:20;33:16; 34:10 <b>IC (1)</b> 34:13 <b>identified (4)</b> 30:3;33:24;41:10; 43:1 <b>identify (3)</b> 39:21;42:7;47:23 <b>identifying (4)</b> 40:1;43:6;44:23; 47:22 <b>identity (1)</b> 42:12 <b>IGC (12)</b> 6:2,13;9:21;11:4, 12;12:3,15;36:17; 38:5,6,19;46:12 <b>IGC's (1)</b> 11:8 <b>illicit (2)</b> 42:23;44:4 <b>impact (1)</b> 11:5 <b>impacting (1)</b> 37:13 <b>implemented (1)</b> 40:25 <b>implementing (2)</b> 25:1;40:19</p>	<p><b>importance (1)</b> 41:5 <b>important (1)</b> 41:16 <b>improperly (1)</b> 24:10 <b>improvement (1)</b> 46:23 <b>inaudible (1)</b> 39:20 <b>inception (1)</b> 38:5 <b>incident (1)</b> 24:24 <b>include (2)</b> 13:17;37:22 <b>included (4)</b> 12:18;21:7;22:20; 38:7 <b>includes (1)</b> 15:5 <b>including (2)</b> 24:24;36:12 <b>Incorporated (8)</b> 15:6,7,7,9;18:2,10, 13;33:12 <b>independent (1)</b> 41:6 <b>Indiana (49)</b> 6:8,23;7:11,12; 9:25;10:19;11:20,24; 12:16;14:24;16:19; 17:2,7,8,10,21;18:7, 19;20:21;29:20;30:6, 17;31:5,13,21;32:1,6; 35:23;36:12;37:14, 19,23;38:8,11,12,14, 15,17;39:2,17;42:4,8; 43:16;45:4;46:9,18, 24;51:1,5 <b>Indianapolis (6)</b> 7:15,24;10:20; 11:2;17:2,5 <b>Indiana's (1)</b> 30:20 <b>Indians (1)</b> 7:15 <b>indicated (1)</b> 45:8 <b>individually (1)</b> 31:13 <b>individuals (2)</b> 12:13,14 <b>INDOT (1)</b> 11:12 <b>industry (6)</b> 13:4;37:14;40:2,4, 5;46:24 <b>inefficiencies (1)</b> 41:10 <b>informal (1)</b> 13:3 <b>information (10)</b></p>	<p>12:17;21:5;22:19; 26:15;27:20;37:10; 44:22,24;46:3;47:13 <b>informed (1)</b> 6:20 <b>initial (1)</b> 31:17 <b>initially (1)</b> 29:10 <b>initiatives (1)</b> 37:12 <b>inland (1)</b> 6:6 <b>Inner (1)</b> 7:12 <b>input (2)</b> 13:10;31:2 <b>Inspector (1)</b> 35:24 <b>institutions (1)</b> 39:6 <b>integral (1)</b> 6:5 <b>integrated (1)</b> 46:1 <b>Integrity (17)</b> 9:2;35:19;36:19; 37:6,8,13,19;38:3,4, 22,25;41:25;42:2; 46:11,17;47:1;49:12 <b>intent (2)</b> 16:10;30:4 <b>Interactive (6)</b> 18:4,6,9;23:23,25; 25:3 <b>interest (1)</b> 12:4 <b>interim (3)</b> 34:1,2,17 <b>internal (5)</b> 6:14;39:14,22; 40:21;41:7 <b>International (1)</b> 15:6 <b>interning (1)</b> 11:24 <b>into (5)</b> 6:15;11:4;12:22; 41:14;42:23 <b>introduction (1)</b> 35:16 <b>investigation (6)</b> 22:18;37:25;44:3, 7;45:12;48:13 <b>investigations (14)</b> 12:5;19:25;21:2; 36:2,16;37:11;41:25; 42:2,21;43:16;46:2,7, 13,14 <b>investigative (2)</b> 45:25;49:6 <b>Investigator (6)</b> 35:20,22,25;36:11;</p>
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38:9,21 <b>investigators (1)</b> 46:12 <b>involved (4)</b> 43:10;44:4;45:13, 22 <b>involves (1)</b> 42:11 <b>involving (4)</b> 30:9;42:14,21; 46:14 <b>IRS (6)</b> 39:7;40:12,23; 42:6;45:16;49:2 <b>issued (2)</b> 33:25;34:18 <b>issues (3)</b> 7:20;13:16;47:22 <b>items (3)</b> 12:20,22;34:22 <b>IU (1)</b> 12:2	44:19;49:3 <b>know-your-customer (1)</b> 41:12	17:22;18:16,21;19:5; 20:14,19;22:14,23; 27:15 <b>licensee (1)</b> 33:11 <b>licensees (13)</b> 12:7;15:3,14; 17:19,24;18:17,23; 19:6;20:16;27:10,12, 18,24 <b>licenses (5)</b> 20:11;21:11;25:24; 26:1,8 <b>licensure (1)</b> 26:12 <b>Lick (2)</b> 17:7;18:10 <b>lieu (1)</b> 27:11 <b>likely (1)</b> 7:4 <b>link (1)</b> 7:20 <b>list (2)</b> 12:13;24:11 <b>little (4)</b> 8:19;11:2;28:16; 50:2 <b>lives (1)</b> 7:9 <b>LLC (23)</b> 15:8,11;16:25; 17:1,2,3,5,6,6,7,8,9, 11,12,14,15;18:7; 19:1,2,3;20:23;22:15, 24 <b>local (6)</b> 11:25;42:4;45:12; 46:4,9;48:15 <b>location (1)</b> 39:9 <b>longer (1)</b> 24:24 <b>longstanding (1)</b> 13:4 <b>look (2)</b> 33:7;48:13 <b>looked (1)</b> 41:14 <b>looking (3)</b> 10:18;36:21;48:22 <b>loss (1)</b> 41:19 <b>lost (1)</b> 45:10 <b>lot (4)</b> 7:19;8:15,24,24 <b>lottery (1)</b> 8:1 <b>Louisiana (1)</b> 38:8 <b>love (1)</b> 35:17	<b>loving (1)</b> 11:3 <b>LP (2)</b> 15:10;18:9 <b>luck (1)</b> 7:6 <b>lunch (1)</b> 8:18	<b>meaning (1)</b> 14:15 <b>meaningfully (1)</b> 7:1 <b>means (2)</b> 48:6,11 <b>measures (2)</b> 24:23;25:1 <b>Media (1)</b> 20:14 <b>meet (4)</b> 26:11;39:6;40:11, 22 <b>meeting (11)</b> 4:8;8:2;9:1;12:12, 17;13:19;21:8;25:6, 8;49:25;50:3 <b>meetings (1)</b> 20:4 <b>Megan (4)</b> 9:18,20,22,24 <b>Melanie (3)</b> 11:7,9,10 <b>member (2)</b> 37:22;42:17 <b>memories (1)</b> 8:4 <b>men (2)</b> 7:8;8:5 <b>mention (2)</b> 29:3,9 <b>mentioned (2)</b> 21:12;30:24 <b>merge (1)</b> 12:3 <b>merits (1)</b> 33:8 <b>messages (1)</b> 24:25 <b>methamphetamine (1)</b> 43:11 <b>million (3)</b> 45:3,20,20 <b>Milton (1)</b> 4:7 <b>mind (1)</b> 9:15 <b>minimum (1)</b> 44:10 <b>minor (1)</b> 10:1 <b>minute (1)</b> 4:2 <b>minutes (4)</b> 5:4,6,15;43:22 <b>missing (1)</b> 5:24 <b>mission (4)</b> 6:15;36:17;37:7,8 <b>mitigate (2)</b> 39:15;40:6 <b>model (2)</b> 29:6,13
<b>J</b>	<b>L</b>		<b>M</b>	
<b>January (3)</b> 24:2;29:18,21 <b>Jason (3)</b> 6:19,25;7:5 <b>Jenn (1)</b> 8:14 <b>Jennings (1)</b> 38:24 <b>job (1)</b> 8:10 <b>join (2)</b> 12:3;38:22 <b>joined (1)</b> 38:15 <b>joining (1)</b> 11:19 <b>July (1)</b> 6:21 <b>June (1)</b> 5:6 <b>jurisdictions (1)</b> 41:23 <b>justice (1)</b> 36:7	<b>ladies (1)</b> 42:24 <b>large (1)</b> 44:8 <b>Las (1)</b> 36:14 <b>last (5)</b> 4:3;8:23;31:2; 41:11;44:25 <b>late (1)</b> 4:2 <b>later (5)</b> 7:14;9:1;45:11,14, 23 <b>launches (1)</b> 6:7 <b>launder (1)</b> 42:9 <b>laundering (9)</b> 36:6,10,16;39:4, 16;43:2;45:16,24; 47:25 <b>law (16)</b> 7:14;11:23;12:2; 13:2;38:10;41:20,21; 44:17,18;45:12;46:4, 9;48:2,5,15,24 <b>laws (2)</b> 39:3;40:24 <b>leading (3)</b> 6:11;30:23;40:4 <b>learned (2)</b> 8:23,24 <b>leave (1)</b> 13:17 <b>leaving (1)</b> 43:6 <b>led (1)</b> 8:20 <b>Leek (1)</b> 12:9 <b>legal (4)</b> 7:20;11:19,23; 34:12 <b>legislative (3)</b> 28:21;31:10;32:5 <b>legitimize (1)</b> 44:2 <b>Leia (1)</b> 22:8 <b>less (1)</b> 29:12 <b>liaison (1)</b> 46:15 <b>license (16)</b> 6:10;14:16,25; 15:13,19;16:3,15;		<b>maintain (2)</b> 16:10;28:19 <b>major (1)</b> 46:14 <b>majored (1)</b> 11:22 <b>making (1)</b> 41:14 <b>manage (1)</b> 13:16 <b>management (2)</b> 10:25;31:8 <b>maneuver (1)</b> 6:9 <b>Manny (3)</b> 35:20;37:4;48:16 <b>many (1)</b> 6:3 <b>March (2)</b> 12:11;31:7 <b>marijuana (1)</b> 43:11 <b>market (1)</b> 41:9 <b>Mascari (4)</b> 10:7,8,8,9 <b>massage (2)</b> 42:23;44:4 <b>master's (1)</b> 10:25 <b>material (1)</b> 21:5 <b>materially (1)</b> 34:6 <b>materials (6)</b> 12:8;25:6;26:17; 27:21;32:16;33:23 <b>matter (1)</b> 33:5 <b>matters (3)</b> 8:3;25:25;27:20 <b>Matyi (1)</b> 9:18 <b>may (7)</b> 28:25;37:4;48:13, 15;49:1,2;51:18.5 <b>mayor (1)</b> 7:23 <b>McKinney (1)</b> 12:2 <b>mean (1)</b> 48:18	
<b>K</b>				
<b>key (3)</b> 21:3;36:17;37:18 <b>kind (7)</b> 9:12;28:19;36:24; 48:6,11,11;49:4 <b>knowing (1)</b> 42:19 <b>knowledge (2)</b> 40:18;46:22 <b>known (5)</b> 8:5;39:11;43:9;				

<p><b>modifications (1)</b> 16:12</p> <p><b>moment (1)</b> 5:25</p> <p><b>monetary (1)</b> 25:4</p> <p><b>money (12)</b> 36:6,10,16;39:4, 16;42:19;43:1,5,6; 45:15,24;47:25</p> <p><b>months (1)</b> 45:17</p> <p><b>Moody (1)</b> 11:17</p> <p><b>more (2)</b> 8:19;44:10</p> <p><b>morning (15)</b> 4:1;14:20,21;20:2, 3,3,6,7;22:10,11,12; 23:19;26:3,4;37:3</p> <p><b>most (3)</b> 30:24;43:9,18</p> <p><b>mostly (1)</b> 44:9</p> <p><b>motion (43)</b> 5:8,10,14;19:10,12, 16,19,22;21:16,19, 22,25;22:3;23:5,6,7, 8,11,17;25:13,14,17, 19,23;26:20,23;27:1, 2,6;28:1,3,7,12; 32:17,19,21,24;33:2; 34:24;35:1,4,7,11</p> <p><b>move (1)</b> 6:6</p> <p><b>moved (1)</b> 11:1</p> <p><b>moving (1)</b> 34:23</p> <p><b>Mrs (1)</b> 23:4</p> <p><b>much (8)</b> 9:13;22:5;33:6; 35:12;47:4;48:9; 49:15,17</p> <p><b>MULLEN (16)</b> 4:10,12,13,16,19, 22,25;5:20,22;9:7,11; 10:9;14:2;28:24; 29:2;35:17</p> <p><b>multimillion (1)</b> 36:5</p> <p><b>multiple (1)</b> 13:17</p> <p><b>must (9)</b> 14:25;16:4,20; 17:22;18:21;34:11, 14,18;39:6</p> <p><b>Myself (1)</b> 38:17</p>	<p><b>name (6)</b> 4:7;6:3,3;14:4; 37:4;45:19</p> <p><b>naming (1)</b> 16:8</p> <p><b>narcotics (2)</b> 36:6;43:9</p> <p><b>national (1)</b> 36:10</p> <p><b>NCFO (1)</b> 6:22</p> <p><b>Neal (8)</b> 14:18,21;19:9,23; 28:22;29:14,15; 32:16</p> <p><b>near (1)</b> 44:8</p> <p><b>necessary (2)</b> 21:4;28:19</p> <p><b>need (2)</b> 40:22;49:6</p> <p><b>needed (2)</b> 6:23;10:13</p> <p><b>negatively (1)</b> 37:13</p> <p><b>New (19)</b> 4:4,12;6:17;9:14; 10:15;11:4,20;14:13, 13,14;16:7,8;17:15; 30:8,9;38:8;41:9; 46:22;49:21</p> <p><b>newspaper (1)</b> 47:11</p> <p><b>Next (9)</b> 6:18;9:14;10:7; 13:12;15:16;16:18; 27:7;30:7;44:7</p> <p><b>nexus (1)</b> 44:5</p> <p><b>nice (1)</b> 8:17</p> <p><b>night (1)</b> 4:4</p> <p><b>nine (1)</b> 45:17</p> <p><b>none (10)</b> 19:18,22;21:16,24; 23:5,13;28:12;33:1, 5;35:11</p> <p><b>norms (1)</b> 40:2</p> <p><b>Notary (2)</b> 51:3,14,5</p> <p><b>note (1)</b> 13:12</p> <p><b>notes (2)</b> 51:7,10</p> <p><b>notice (3)</b> 13:14;30:4;31:19</p> <p><b>notices (3)</b> 29:25;31:11,12</p> <p><b>Novomatic (1)</b> 12:7</p>	<p><b>NP0699809 (1)</b> 51:17</p> <p><b>number (2)</b> 41:6;51:16,5</p> <p><b>numerous (2)</b> 38:16;45:2</p> <p><b>NYX (1)</b> 15:10</p>	<p>46:19;47:7</p> <p><b>Operating (2)</b> 17:9;30:16</p> <p><b>operations (2)</b> 20:17;37:24</p> <p><b>operator (3)</b> 18:21;22:14,23</p> <p><b>opinion (1)</b> 34:12</p> <p><b>opportunities (1)</b> 39:16</p> <p><b>opportunity (4)</b> 26:13;36:23;47:1; 49:18</p> <p><b>Opposed (8)</b> 19:21;22:2;23:16; 25:22;27:5;28:11; 33:4;35:10</p> <p><b>optimal (1)</b> 39:25</p> <p><b>order (25)</b> 4:8;13:16;14:19, 23;15:12;16:18; 17:17,20;18:15,19; 19:4;20:1,13,22;22:8, 13,22;23:6,24;25:13; 26:18;27:8,22;33:10; 34:24</p> <p><b>Orders (13)</b> 15:17,23;16:13; 19:10;20:9;21:10,17; 26:2,7,16,21;27:8; 28:1</p> <p><b>org (1)</b> 38:2</p> <p><b>organization (4)</b> 7:11;8:9;10:6;36:7</p> <p><b>organizational (2)</b> 37:18,20</p> <p><b>organizations (1)</b> 43:2</p> <p><b>others (2)</b> 42:7,18</p> <p><b>out (10)</b> 29:5;31:1;43:24; 44:10,11;48:3,4,5; 49:1,2</p> <p><b>outdoors (1)</b> 11:15</p> <p><b>outlines (1)</b> 24:21</p> <p><b>over (7)</b> 6:11;24:5,13; 43:17;44:9;45:3,19</p> <p><b>oversaw (1)</b> 6:10</p> <p><b>overview (1)</b> 37:17</p> <p><b>own (1)</b> 46:7</p> <p><b>owners (2)</b> 21:3;42:18</p> <p><b>owner's (2)</b></p>	<p>15:19;16:3</p>
		<p><b>O</b></p> <p><b>oath (1)</b> 13:24</p> <p><b>observed (1)</b> 44:8</p> <p><b>obvious (1)</b> 5:23</p> <p><b>obviously (1)</b> 47:24</p> <p><b>occupational (6)</b> 25:24;26:1,8; 27:10,15,24</p> <p><b>occur (1)</b> 39:17</p> <p><b>occurred (1)</b> 43:16</p> <p><b>Odds (1)</b> 15:8</p> <p><b>off (1)</b> 27:17</p> <p><b>offer (2)</b> 20:20,25</p> <p><b>offered (2)</b> 27:12;39:10</p> <p><b>office (7)</b> 9:22;29:5;31:7; 32:1,3;38:24;42:5</p> <p><b>officer (1)</b> 40:17</p> <p><b>often (1)</b> 36:11</p> <p><b>old (6)</b> 7:19;14:10,12,12, 14;49:21</p> <p><b>Once (2)</b> 13:7;48:24</p> <p><b>one (13)</b> 4:2;5:23;13:8; 15:14;16:17;17:19; 18:17;19:6;29:3; 41:4;44:25;45:10,18</p> <p><b>ongoing (2)</b> 41:2,4</p> <p><b>online (3)</b> 20:15,16,20</p> <p><b>only (4)</b> 8:13;13:8;44:12; 48:8</p> <p><b>open (2)</b> 39:24;48:12</p> <p><b>opening (2)</b> 6:11;47:4</p> <p><b>operate (2)</b></p>	<p><b>P</b></p> <p><b>packages (1)</b> 13:8</p> <p><b>packet (3)</b> 12:18,24;22:21</p> <p><b>packets (2)</b> 13:1,3</p> <p><b>paid (7)</b> 6:7;15:21;18:20; 22:14,23;27:17; 30:13</p> <p><b>paperwork (1)</b> 15:21</p> <p><b>parallel (1)</b> 46:1</p> <p><b>Park (5)</b> 17:3,12,13,14;18:4</p> <p><b>part (3)</b> 8:21;39:8;42:18</p> <p><b>participants (1)</b> 24:1</p> <p><b>Partners (2)</b> 15:6;48:25</p> <p><b>partnership (2)</b> 37:9;46:21</p> <p><b>parts (1)</b> 6:5</p> <p><b>passion (1)</b> 12:3</p> <p><b>patron (4)</b> 24:3,6,12;44:7</p> <p><b>patrons (3)</b> 20:25;24:11;25:1</p> <p><b>patron's (1)</b> 24:4</p> <p><b>payment (8)</b> 15:1,4;16:21,24; 17:23;18:1,22,25</p> <p><b>Peevler (2)</b> 38:9,12</p> <p><b>penalties (4)</b> 14:5;30:12;31:5; 32:11</p> <p><b>people (1)</b> 47:24</p> <p><b>per (2)</b> 31:5,21</p> <p><b>period (11)</b> 13:3,7;15:14; 16:17;17:19;18:17; 19:6;27:15;30:1; 31:12,19</p> <p><b>periods (1)</b> 31:23</p> <p><b>perjury (1)</b> 14:6</p> <p><b>permanent (7)</b> 20:11,13,18,22; 21:11;22:14,23</p> <p><b>permission (1)</b></p>	
<p><b>N</b></p>				

<p>33:14 <b>person (10)</b> 40:17;42:14;43:17, 25;44:14,23;45:21; 48:6,10;49:2 <b>personnel (1)</b> 13:16 <b>persons (1)</b> 21:4 <b>pertain (1)</b> 8:3 <b>picking (1)</b> 48:21 <b>picks (1)</b> 48:18 <b>piece (1)</b> 8:17 <b>pillar (5)</b> 40:17,21;41:2,6,11 <b>pillars (1)</b> 40:14 <b>pilot (1)</b> 4:3 <b>place (3)</b> 6:14;40:13,14 <b>placed (1)</b> 24:16 <b>plan (1)</b> 14:3 <b>Platform (2)</b> 11:15;24:4 <b>play (2)</b> 43:21;44:16 <b>played (1)</b> 48:21 <b>players (2)</b> 24:14,15 <b>please (11)</b> 9:15;14:1,3;19:19; 21:25;23:14;25:20; 29:1;33:2;35:7;37:5 <b>pleased (1)</b> 36:20 <b>pleasure (2)</b> 4:13;5:22 <b>Police (3)</b> 38:11,12;42:4 <b>policies (4)</b> 39:15,22;40:21,24 <b>policy (1)</b> 12:4 <b>political (1)</b> 11:22 <b>positive (1)</b> 36:18 <b>possible (1)</b> 44:5 <b>posted (3)</b> 12:19;31:11,20 <b>posting (1)</b> 32:5 <b>potential (1)</b> 46:3</p>	<p><b>Power (5)</b> 11:14;15:25;16:5, 8,15 <b>practices (1)</b> 7:25 <b>preliminary (1)</b> 34:21 <b>present (13)</b> 12:9;14:18;16:7; 20:1;22:8;25:25; 28:23;36:12,20;37:5, 25;46:3;47:1 <b>presentation (7)</b> 12:23;13:19;25:9; 35:15,25;37:17;47:4 <b>presented (3)</b> 16:12;34:7,22 <b>presenting (4)</b> 13:23,25;14:4; 35:19 <b>president (2)</b> 6:22;10:4 <b>pretty (2)</b> 28:17;48:9 <b>prevent (1)</b> 24:23 <b>previous (4)</b> 12:17;38:10;44:16; 49:3 <b>previously (3)</b> 13:11;15:23;21:11 <b>principle (1)</b> 13:4 <b>Prior (2)</b> 38:5,23 <b>priority (1)</b> 40:1 <b>privatized (1)</b> 43:3 <b>PrizePicks (1)</b> 19:1 <b>proactively (1)</b> 37:9 <b>probably (3)</b> 8:10;43:8;48:10 <b>problem (3)</b> 42:16,20;47:24 <b>procedures (4)</b> 33:24;39:15,22; 40:22 <b>proceed (1)</b> 13:23 <b>PROCEEDINGS (1)</b> 50:4 <b>proceeds (2)</b> 40:8;42:9 <b>process (5)</b> 29:6,8;30:21,25; 39:24 <b>processes (1)</b> 48:1 <b>products (1)</b> 41:9</p>	<p><b>Professional (1)</b> 51:15 <b>program (3)</b> 40:15,20;41:12 <b>programs (1)</b> 40:11 <b>program's (1)</b> 39:21 <b>prohibited (1)</b> 24:1 <b>prominent (1)</b> 8:21 <b>promote (2)</b> 46:22,23 <b>promoted (1)</b> 38:19 <b>promulgate (1)</b> 31:9 <b>promulgation (2)</b> 30:9,20 <b>proper (1)</b> 15:21 <b>properties (1)</b> 46:15 <b>proposed (4)</b> 31:17;33:12,15; 34:1 <b>prosecuting (1)</b> 36:13 <b>prosecution (1)</b> 46:6 <b>Prosecutors (3)</b> 41:20;46:4,9 <b>protecting (1)</b> 46:18 <b>proud (1)</b> 28:18 <b>prove (1)</b> 49:13 <b>provide (2)</b> 34:11;37:21 <b>provided (7)</b> 13:11;22:21;25:5; 32:15;33:22;44:23; 45:7 <b>provides (2)</b> 20:15;40:4 <b>providing (1)</b> 39:25 <b>provision (1)</b> 30:17 <b>public (16)</b> 8:24;11:25;12:3; 30:1;31:11,12,14,17, 19,22,23;38:13; 41:19;46:19;51:3, 14.5 <b>publicly (2)</b> 8:5,22 <b>purchases (1)</b> 45:21 <b>Purdue (1)</b> 11:21</p>	<p><b>purpose (1)</b> 39:20 <b>pursuant (5)</b> 12:24;14:24;16:19; 17:21;18:19 <b>pursue (1)</b> 11:23 <b>push (1)</b> 44:15</p> <p style="text-align: center;"><b>Q</b></p> <p><b>quarter (1)</b> 13:18 <b>quorum (2)</b> 5:1,3</p> <p style="text-align: center;"><b>R</b></p> <p><b>Race (3)</b> 17:4,12,14 <b>ranged (1)</b> 45:4 <b>ratification (1)</b> 34:20 <b>ratifying (1)</b> 27:23 <b>RBI (1)</b> 7:12 <b>reach (2)</b> 49:1,2 <b>reached (1)</b> 31:1 <b>read (3)</b> 9:9;29:10;47:10 <b>readopt (1)</b> 30:3 <b>readopted (2)</b> 29:23;30:5 <b>readoption (3)</b> 28:15;29:17,25 <b>really (2)</b> 8:16;37:2 <b>reason (1)</b> 16:3 <b>reasonable (1)</b> 48:10 <b>received (7)</b> 13:5,8;31:15,20, 22;33:10;43:7 <b>recent (2)</b> 9:24;10:23 <b>recently (2)</b> 11:1,7 <b>reception (1)</b> 9:21 <b>receptionist (2)</b> 9:22;10:11 <b>recognize (1)</b> 6:18 <b>recommendations (1)</b> 47:7 <b>recommended (1)</b></p>	<p>32:7 <b>reconvene (1)</b> 49:25 <b>record (1)</b> 44:25 <b>records (1)</b> 45:8 <b>reference (1)</b> 20:10 <b>reflection (1)</b> 36:18 <b>regarding (9)</b> 13:2,13;15:17; 26:16;27:20;30:12, 18;31:4;32:10 <b>Register (3)</b> 30:6;31:13;32:6 <b>Registered (1)</b> 51:15 <b>regular (1)</b> 8:13 <b>regularly (1)</b> 27:15 <b>regulated (1)</b> 32:11 <b>regulation (1)</b> 12:4 <b>regulations (3)</b> 37:24;39:3;40:19 <b>Regulatory (1)</b> 19:2 <b>reinforce (1)</b> 41:5 <b>reinvestigations (2)</b> 12:5,6 <b>related (1)</b> 13:6 <b>relationships (2)</b> 36:4;46:8 <b>Relevant (1)</b> 25:4 <b>relinquishment (1)</b> 27:14 <b>rely (1)</b> 47:6 <b>remiss (1)</b> 29:9 <b>removal (1)</b> 24:17 <b>removed (1)</b> 24:10 <b>renewal (14)</b> 15:2,4,18,22;16:2, 4,7,21,23;17:23,25; 18:16,22,24 <b>renewals (1)</b> 14:16 <b>renewed (4)</b> 15:1;16:20;17:22; 18:21 <b>renewing (4)</b> 15:13;16:14;17:18; 19:5</p>
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<p><b>Repeat (2)</b> 14:3;30:24</p> <p><b>report (5)</b> 5:20;9:6;13:14,20; 22:20</p> <p><b>reported (1)</b> 34:19</p> <p><b>Reporter (2)</b> 51:4,15</p> <p><b>reporting (1)</b> 40:18</p> <p><b>reports (2)</b> 12:8;21:7</p> <p><b>Representatives (1)</b> 11:25</p> <p><b>reputation (1)</b> 36:15</p> <p><b>request (9)</b> 15:3;16:4,6,23; 17:25;18:24;31:9,18; 33:10</p> <p><b>requested (2)</b> 33:16;44:12</p> <p><b>requesting (1)</b> 33:12</p> <p><b>required (9)</b> 13:2;15:4;16:24; 17:25;18:25;22:16; 29:24;30:1;31:4</p> <p><b>requirement (1)</b> 33:17</p> <p><b>requirements (4)</b> 37:16;39:7;40:12, 18</p> <p><b>requires (1)</b> 34:17</p> <p><b>residential (1)</b> 42:14</p> <p><b>RESKE (1)</b> 47:15</p> <p><b>Resolution (7)</b> 28:23;29:16,16; 30:2;33:18,25;34:17</p> <p><b>resolutions (4)</b> 30:8,10;32:8,17</p> <p><b>Resort (5)</b> 6:13;17:7,16; 20:24</p> <p><b>resource (1)</b> 40:4</p> <p><b>respective (5)</b> 15:14;17:19;18:17; 19:6;34:15</p> <p><b>respectively (4)</b> 15:19;16:1,16; 30:15</p> <p><b>responded (1)</b> 31:15</p> <p><b>responsibility (1)</b> 47:8</p> <p><b>rest (1)</b> 8:20</p> <p><b>retiring (1)</b></p>	<p>38:11</p> <p><b>return (1)</b> 43:22</p> <p><b>returns (1)</b> 45:7</p> <p><b>Revenue (2)</b> 38:14;42:4</p> <p><b>review (9)</b> 21:9;24:4,12; 29:25;39:1,20;41:6, 7;44:22</p> <p><b>reviewed (1)</b> 5:5</p> <p><b>reviews (1)</b> 41:8</p> <p><b>Reviving (1)</b> 7:12</p> <p><b>right (3)</b> 14:2;27:5;47:19</p> <p><b>Rising (6)</b> 15:18,20,25;16:9, 16;38:20</p> <p><b>risk (3)</b> 36:10;39:11,13</p> <p><b>road (1)</b> 48:20</p> <p><b>robust (1)</b> 40:11</p> <p><b>role (4)</b> 6:17,24;8:9;11:4</p> <p><b>roll (3)</b> 4:11;9:10;12:22</p> <p><b>room (1)</b> 47:9</p> <p><b>rule (12)</b> 13:1,8;29:6,22,23; 30:5,20;31:13,17,20; 32:1,4</p> <p><b>rules (18)</b> 12:24;13:6,10; 24:1;28:16,17;29:17, 20;30:10,19;31:3,4,9, 24;32:10,15;40:24; 44:15</p> <p><b>run (1)</b> 47:25</p> <p><b>Rush (4)</b> 18:8;23:22,25;25:3</p>	<p>30:20</p> <p><b>scheduled (2)</b> 27:16;41:8</p> <p><b>Schnauzers (1)</b> 11:16</p> <p><b>school (2)</b> 10:3;12:2</p> <p><b>science (1)</b> 11:22</p> <p><b>Score (1)</b> 20:14</p> <p><b>scrutiny (2)</b> 28:19,20</p> <p><b>search (1)</b> 44:25</p> <p><b>second (33)</b> 5:12,13,14;12:1; 19:14,15,16;21:20, 21,22;23:9,10,11; 25:15,16,17;26:24, 25;27:1;28:5,6,7; 31:19,22,23;32:22, 23,24;34:9;35:2,3,5; 40:21</p> <p><b>Section (6)</b> 14:24,25;16:19; 17:21;18:19,20</p> <p><b>sections (1)</b> 30:3</p> <p><b>seeking (1)</b> 33:14</p> <p><b>send (1)</b> 43:5</p> <p><b>sending (1)</b> 24:25</p> <p><b>senior (1)</b> 11:13</p> <p><b>sentenced (2)</b> 45:16,24</p> <p><b>September (2)</b> 4:9;51:6</p> <p><b>serve (1)</b> 38:21</p> <p><b>served (2)</b> 6:25;7:10</p> <p><b>service (6)</b> 6:16;7:5;8:6;10:4, 15;38:13</p> <p><b>services (5)</b> 20:15,21;31:10; 32:5;47:21</p> <p><b>serving (5)</b> 6:19;7:23;8:8,12; 38:16</p> <p><b>set (1)</b> 29:18</p> <p><b>settlement (9)</b> 23:21,24;24:21; 25:4,5,6;27:9,13,19</p> <p><b>settling (1)</b> 10:18</p> <p><b>seven (1)</b> 45:16</p>	<p><b>several (3)</b> 10:14;45:3;46:15</p> <p><b>share (2)</b> 41:24;47:8</p> <p><b>SharePoint (1)</b> 11:14</p> <p><b>sharing (1)</b> 37:7</p> <p><b>SHELTON (3)</b> 23:19;25:10,12</p> <p><b>sheriff (1)</b> 38:24</p> <p><b>Sheriff's (2)</b> 38:24;42:5</p> <p><b>show (1)</b> 24:12</p> <p><b>showcased (1)</b> 36:8</p> <p><b>showed (1)</b> 24:5</p> <p><b>showing (1)</b> 44:21</p> <p><b>side (1)</b> 48:20</p> <p><b>SidePrize (1)</b> 19:1</p> <p><b>sign (9)</b> 19:21;22:2;23:16; 25:22;27:5;28:11; 33:4;35:10;36:24</p> <p><b>significant (1)</b> 39:1</p> <p><b>signify (7)</b> 5:17;19:19;25:19; 27:2;28:9;33:2;35:7</p> <p><b>similar (1)</b> 44:13</p> <p><b>sit (1)</b> 43:21</p> <p><b>size (1)</b> 39:9</p> <p><b>Sky (1)</b> 17:6</p> <p><b>Small (2)</b> 6:1;45:9</p> <p><b>smuggling (1)</b> 42:22</p> <p><b>so-called (1)</b> 33:16</p> <p><b>society (1)</b> 11:23</p> <p><b>solemnly (1)</b> 14:5</p> <p><b>Solutions (1)</b> 15:5</p> <p><b>someone (1)</b> 5:24</p> <p><b>sometimes (1)</b> 48:17</p> <p><b>sort (1)</b> 29:6</p> <p><b>source (6)</b> 40:7,7;42:8;44:3,</p>	<p>19;48:12</p> <p><b>sources (1)</b> 41:14</p> <p><b>southeast (1)</b> 38:22</p> <p><b>Southern (3)</b> 17:10;18:14;45:3</p> <p><b>speak (2)</b> 7:3;8:22</p> <p><b>speaks (1)</b> 13:9</p> <p><b>special (1)</b> 35:15</p> <p><b>Specifically (1)</b> 30:22</p> <p><b>spend (2)</b> 8:14;40:8</p> <p><b>spending (1)</b> 11:15</p> <p><b>spent (7)</b> 7:8,14,17,24;8:1; 45:19,20</p> <p><b>sports (23)</b> 6:7,7;8:16;10:25; 18:21;19:2;20:15,16, 18,20,25;22:7,14,15, 23,24;25:11;30:13, 13,14;45:1,2,4</p> <p><b>Sportsbook (6)</b> 17:4,12,15;18:3,11, 14</p> <p><b>SportsHub (1)</b> 19:2</p> <p><b>SS (1)</b> 51:1.5</p> <p><b>staff (27)</b> 7:4;8:21;12:12,25; 13:17,17;14:22;20:8; 21:1,4;22:12,17; 23:20;25:25;26:5; 27:9,12;28:18;29:4, 24;31:1,3,14,25;32:7; 37:4;47:6</p> <p><b>Staff's (4)</b> 21:7;22:20;31:9; 47:5</p> <p><b>stakeholders (3)</b> 13:5;31:1;36:4</p> <p><b>stand (1)</b> 14:1</p> <p><b>standards (1)</b> 26:12</p> <p><b>standing (1)</b> 9:15</p> <p><b>Star (6)</b> 15:18,20,25;16:9, 16;38:20</p> <p><b>start (4)</b> 41:3;48:3,22,24</p> <p><b>started (2)</b> 11:7,10</p> <p><b>State (21)</b> 6:2,8;7:2,4;9:25;</p>
--	--	--	---	--

10:16;11:10;14:4; 21:25;23:13;31:3; 37:15;23;38:11,12; 39:2;42:3;46:10,16; 51:1,5 <b>stated (1)</b> 16:10 <b>statement (1)</b> 37:8 <b>States (1)</b> 43:7 <b>state's (1)</b> 6:12 <b>stating (7)</b> 5:17;19:19;25:20; 27:3;28:9;33:2;35:8 <b>status (1)</b> 33:21 <b>Stenographic (3)</b> 51:4,7,9 <b>step (2)</b> 6:23;11:3 <b>stepped (1)</b> 47:9 <b>steps (1)</b> 30:22 <b>stole (1)</b> 42:15 <b>stoves (1)</b> 48:19 <b>Street (4)</b> 18:8;23:23,25;25:3 <b>strength (1)</b> 39:21 <b>strong (1)</b> 40:11 <b>strongest (1)</b> 43:12 <b>structure (1)</b> 37:18 <b>student (1)</b> 11:19 <b>stuff (1)</b> 47:19 <b>subject (1)</b> 14:5 <b>submit (2)</b> 31:25;32:2 <b>submitted (6)</b> 15:3;16:23;17:24; 18:23;22:16;32:4 <b>substantial (1)</b> 21:3 <b>substantive (1)</b> 31:21 <b>success (1)</b> 36:4 <b>successful (4)</b> 6:6,15;36:8;40:14 <b>successfully (1)</b> 12:25 <b>suggestion (1)</b> 8:20	<b>suitability (2)</b> 21:6;22:20 <b>suitable (1)</b> 20:20 <b>supervisor (1)</b> 38:19 <b>suppliers (1)</b> 30:13 <b>supplier's (2)</b> 14:25;20:14 <b>support (4)</b> 10:5;40:1;42:15,19 <b>sure (1)</b> 6:13 <b>Surveillance (2)</b> 15:11;44:8 <b>swear (1)</b> 14:5 <b>Sydney (4)</b> 11:17,18,19,20 <b>system (2)</b> 11:13;43:3 <b>systems (1)</b> 6:14	14:9;19:8,14,16; 20:5;21:14,20,22; 22:5;23:3,8,11;25:10, 15,17;26:4,20,24; 27:1,25;28:5,7,14; 29:1,11;32:14,21,24; 34:21;35:2,4,14; 36:22;47:3,16;49:10, 15,19 <b>thoroughly (1)</b> 36:3 <b>three (9)</b> 13:18;20:9,11; 24:13,16;39:1;44:14, 24;45:11 <b>tied (1)</b> 42:23 <b>timely (4)</b> 15:3;16:23;17:24; 18:24 <b>times (1)</b> 7:19 <b>today (11)</b> 10:23;12:23;13:13; 14:1,4,10;30:19,23; 36:21;37:5;49:20 <b>today's (1)</b> 13:15 <b>together (4)</b> 7:17;13:10;46:21; 49:5 <b>told (1)</b> 41:21 <b>Tonya (2)</b> 51:3,14 <b>took (1)</b> 51:6 <b>topics (1)</b> 37:22 <b>total (3)</b> 24:17,18,19 <b>totaling (2)</b> 44:9;45:2 <b>totals (1)</b> 12:14 <b>toy (1)</b> 11:16 <b>tradition (1)</b> 8:17 <b>trafficking (8)</b> 36:6;42:22;43:9; 44:6,19;45:14,15,23 <b>training (3)</b> 41:2,3,4 <b>transaction (4)</b> 33:13,15;34:15; 45:2 <b>transactions (3)</b> 33:21;34:2;45:1 <b>transcript (2)</b> 51:8,9 <b>transferring (1)</b> 11:12	<b>transnational (1)</b> 43:1 <b>transparency (1)</b> 8:25 <b>Treasury (2)</b> 36:9;38:7 <b>true (3)</b> 47:14,15;51:8 <b>trust (2)</b> 41:20;46:24 <b>trustee-in-waiting (1)</b> 16:9 <b>trustees-in-waiting (1)</b> 16:11 <b>truth (3)</b> 14:6,6,7 <b>try (2)</b> 48:4,5 <b>trying (1)</b> 44:2 <b>turn (1)</b> 30:7 <b>two (2)</b> 9:17;11:16 <b>two-meeting (1)</b> 33:17 <b>types (2)</b> 39:9;41:22	47:6 <b>USA (1)</b> 15:6 <b>use (2)</b> 42:7;43:4 <b>used (3)</b> 27:17;41:18;48:19 <b>using (1)</b> 40:6 <b>usually (1)</b> 5:24	
	<b>T</b>		<b>U</b>	<b>V</b>	
	<b>table (1)</b> 43:21 <b>talent (1)</b> 7:18 <b>talented (1)</b> 10:3 <b>talking (2)</b> 7:18;50:2 <b>tasked (2)</b> 38:25;39:8 <b>tax (2)</b> 45:7,7 <b>team (1)</b> 37:21 <b>technologies (1)</b> 46:22 <b>tenure (3)</b> 6:4;7:3;8:23 <b>terms (6)</b> 8:25;27:19;34:5,7, 9;47:7 <b>Terre (3)</b> 6:12;17:16;20:24 <b>thanking (1)</b> 7:5 <b>theft (2)</b> 42:12,13 <b>therefore (1)</b> 26:11 <b>Third (2)</b> 34:11;41:2 <b>Thomas (3)</b> 10:21,22,23 <b>THOMPSON (49)</b> 4:1,7,11,14,15;5:2, 12,14;7:7;9:9;13:21;	<b>today's (1)</b> 13:15 <b>together (4)</b> 7:17;13:10;46:21; 49:5 <b>told (1)</b> 41:21 <b>Tonya (2)</b> 51:3,14 <b>took (1)</b> 51:6 <b>topics (1)</b> 37:22 <b>total (3)</b> 24:17,18,19 <b>totaling (2)</b> 44:9;45:2 <b>totals (1)</b> 12:14 <b>toy (1)</b> 11:16 <b>tradition (1)</b> 8:17 <b>trafficking (8)</b> 36:6;42:22;43:9; 44:6,19;45:14,15,23 <b>training (3)</b> 41:2,3,4 <b>transaction (4)</b> 33:13,15;34:15; 45:2 <b>transactions (3)</b> 33:21;34:2;45:1 <b>transcript (2)</b> 51:8,9 <b>transferring (1)</b> 11:12	<b>U</b>	<b>ultimate (1)</b> 45:25 <b>under (5)</b> 11:2;26:1;29:20; 30:16;42:15 <b>Underdog (4)</b> 22:15,18,24,24 <b>undergraduate (1)</b> 11:21 <b>understands (1)</b> 40:19 <b>unit (1)</b> 42:14 <b>United (1)</b> 43:6 <b>University (5)</b> 6:23;9:25;10:20, 24;11:21 <b>unless (1)</b> 29:23 <b>unnerving (1)</b> 50:3 <b>unpaid (1)</b> 27:14 <b>up (10)</b> 4:3,5,5,6;14:17; 15:7;30:23;44:21; 48:18,21 <b>uphold (1)</b> 37:19 <b>upon (4)</b> 6:21;16:2;38:11;	<b>vice (2)</b> 6:21;10:3 <b>victim (1)</b> 43:13 <b>violate (1)</b> 34:10 <b>violated (1)</b> 24:1 <b>violaters (1)</b> 46:14 <b>voluntary (1)</b> 27:14
			<b>W</b>		
				<b>wager (2)</b> 12:15;45:10 <b>wagered (2)</b> 24:6,18 <b>wagering (13)</b> 6:8;18:2,10,12; 20:16,19,20,25;22:7; 25:11;30:14;45:2; 48:12 <b>wagers (2)</b> 24:16;45:4 <b>waging (1)</b> 45:1 <b>waiver (1)</b> 33:16 <b>Waivers (2)</b> 12:15,16 <b>wake (1)</b> 4:6 <b>walk (1)</b>	

43:15 <b>watch (1)</b> 47:11 <b>watching (1)</b> 35:22 <b>water (2)</b> 48:19,21 <b>Watson (9)</b> 25:25;26:3,5;27:7; 28:8,13;33:7,9;35:13 <b>way (3)</b> 4:4;7:17;43:4 <b>weaknesses (1)</b> 39:22 <b>website (2)</b> 12:19;25:8 <b>weekend (1)</b> 48:22 <b>welcome (6)</b> 8:7;9:3,17,20; 10:17;36:25 <b>wherein (1)</b> 23:25 <b>whole (2)</b> 7:4;14:6 <b>Williams (10)</b> 4:23,24;5:10; 19:15;21:18;26:22; 28:6;34:25;47:20; 49:7 <b>wish (2)</b> 6:17;7:5 <b>withdraw (1)</b> 26:14 <b>withdrawn (1)</b> 24:19 <b>withdrew (2)</b> 24:7,16 <b>without (3)</b> 30:4;42:18;43:5 <b>won (1)</b> 24:7 <b>wonderful (2)</b> 13:5;36:22 <b>words (1)</b> 9:12 <b>work (13)</b> 11:6;29:13;36:17, 23;37:9;41:8;42:3, 25;47:5,6,17;49:4,16 <b>worked (2)</b> 38:6;48:14 <b>Workforce (1)</b> 11:11 <b>working (6)</b> 27:16;38:8,14; 46:8,20;48:24 <b>works (1)</b> 46:11 <b>writing (1)</b> 34:7 <b>written (5)</b> 15:24;16:5,8;	40:21,25  <b>Y</b>  <b>Yahoo (1)</b> 19:2 <b>year (17)</b> 8:23;11:2;12:1; 15:1,14;16:17,21; 17:19,22;18:17,22; 19:6;29:19,22,22; 31:2,7 <b>yearly (1)</b> 39:19 <b>years (6)</b> 7:1;10:14;38:7,10; 45:17,24 <b>year's (1)</b> 35:23 <b>York (2)</b> 4:4;38:8 <b>young (1)</b> 42:24  <b>Z</b>  <b>Zac (1)</b> 25:25  <b>1</b>  <b>1,072 (1)</b> 12:14 <b>11:01 (1)</b> 4:2 <b>11:50 (2)</b> 49:24;50:4 <b>115 (1)</b> 14:19 <b>118 (2)</b> 20:1;21:17 <b>119 (2)</b> 22:9;23:6 <b>12 (2)</b> 12:15;24:14 <b>120 (1)</b> 25:13 <b>124 (3)</b> 26:7,18,21 <b>130 (4)</b> 26:2;27:8,22;28:2 <b>135 (1)</b> 32:18 <b>136 (1)</b> 34:24 <b>13th (1)</b> 6:12 <b>16 (1)</b> 24:14 <b>1623 (1)</b> 12:25 <b>173 (1)</b> 24:11	<b>18 (2)</b> 24:5,15 <b>19 (2)</b> 4:9;12:12 <b>1924 (1)</b> 4:9 <b>1994 (1)</b> 38:5 <b>19th (1)</b> 50:1 <b>1st (3)</b> 6:21;29:18,21  <b>2</b>  <b>2 (1)</b> 19:11 <b>2005 (1)</b> 38:15 <b>2006 (1)</b> 38:18 <b>2015 (1)</b> 45:18 <b>2016 (2)</b> 24:14;45:18 <b>2017 (2)</b> 11:10;38:20 <b>2017-109 (3)</b> 33:19,25;34:17 <b>2021 (1)</b> 38:23 <b>2023-114 (1)</b> 15:23 <b>2023-115 (1)</b> 15:23 <b>2023-164 (1)</b> 15:24 <b>2024 (13)</b> 4:9;5:6;22:8;23:6; 24:2,9,14;25:13; 28:23;31:10;34:24; 36:9;51:6 <b>2024-109 (4)</b> 14:19,23;15:12; 19:10 <b>2024-110 (2)</b> 15:17;16:13 <b>2024-111 (2)</b> 15:17;16:13 <b>2024-112 (2)</b> 15:17;16:14 <b>2024-113 (2)</b> 16:18;17:17 <b>2024-114 (2)</b> 17:20;18:15 <b>2024-115 (3)</b> 18:19;19:4,11 <b>2024-116 (5)</b> 20:1,9,13;21:10,17 <b>2024-117 (2)</b> 20:10,18 <b>2024-118 (3)</b> 20:10,22;21:10	<b>2024-119 (2)</b> 22:13,22 <b>2024-120 (1)</b> 23:24 <b>2024-121 (4)</b> 26:2,7,18,21 <b>2024-125 (3)</b> 27:8,22;28:1 <b>2024-131 (3)</b> 29:16,16;30:2 <b>2024-132 (3)</b> 30:11;32:8,17 <b>2024-133 (2)</b> 30:11;32:8 <b>2024-134 (2)</b> 30:11;32:8 <b>2024-135 (2)</b> 30:11;32:9 <b>2024-136 (1)</b> 33:10 <b>2025 (1)</b> 51:18.5 <b>20s (2)</b> 43:18;44:9 <b>20th (1)</b> 5:6 <b>2-2-8 (1)</b> 14:25 <b>23 (1)</b> 51:18.5 <b>23rd (1)</b> 24:2 <b>26 (1)</b> 4:9 <b>26-3-10 (1)</b> 18:20 <b>26th (1)</b> 51:6 <b>27 (1)</b> 38:10 <b>27th (1)</b> 24:9 <b>28 (1)</b> 38:7  <b>3</b>  <b>34 (1)</b> 45:24 <b>39,764.75 (1)</b> 24:19 <b>3rd (1)</b> 31:10  <b>4</b>  <b>4-22-2 (1)</b> 29:21 <b>4-22-2-19.6 (2)</b> 30:18;31:6 <b>433 (1)</b> 34:13 <b>4-33 (1)</b>	34:10 <b>4-33-24-15 (1)</b> 18:20 <b>4-33-7-8 (1)</b> 14:24 <b>435 (1)</b> 34:13 <b>4-35 (1)</b> 34:10 <b>4-38-6-6 (1)</b> 17:21 <b>4-38-8-1 (1)</b> 16:19 <b>45 (1)</b> 43:22  <b>6</b>  <b>68 (3)</b> 14:25;18:20;33:16  <b>7</b>  <b>73 (1)</b> 24:11  <b>9</b>  <b>9th (1)</b> 24:13
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