

**ORDER 2022-214  
IN RE SETTLEMENT AGREEMENT**

**CSI OPERATING COMPANY, LLC d/b/a CAESARS SOUTHERN INDIANA  
22-CS-04**

After having reviewed the attached Settlement Agreement, the Indiana Gaming Commission hereby:

**APPROVED**

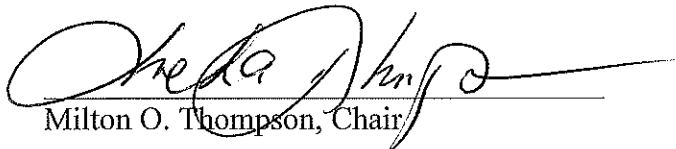
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APPROVES OR DISAPPROVES

the proposed terms of the Settlement Agreement.

**IT IS SO ORDERED THIS THE 15<sup>th</sup> DAY OF DECEMBER 2022.**

**THE INDIANA GAMING COMMISSION:**

  
Milton O. Thompson, Chair

ATTEST:

  
Jason Dudich, Secretary

**STATE OF INDIANA  
INDIANA GAMING COMMISSION**

|                                       |   |                   |
|---------------------------------------|---|-------------------|
| <b>IN RE THE MATTER OF:</b>           | ) |                   |
|                                       | ) | <b>SETTLEMENT</b> |
| <b>CSI OPERATING COMPANY, LLC</b>     | ) | <b>22-CS-04</b>   |
| <b>d/b/a CAESARS SOUTHERN INDIANA</b> | ) |                   |

**SETTLEMENT AGREEMENT**

The Indiana Gaming Commission ("Commission") by and through its Executive Director Greg Small and CSI Operating Company, LLC d/b/a Caesars Southern Indiana ("Caesars Southern Indiana"), (collectively, the "Parties") desire to enter into this settlement agreement ("Agreement") prior to the initiation of a disciplinary proceeding pursuant to 68 IAC 13-1-18(a). The Parties stipulate and agree that the following facts are true:

**FINDINGS OF FACT**

**COUNT I**

1. 68 IAC 11-9-2(a) provides the casino licensee or trustee shall submit to the executive director internal control procedures concerning the withholding of cash winnings from delinquent obligors in accordance with 68 IAC 11-1.
2. 68 IAC 11-1-3(c)(4) provides that no casino licensee or casino license applicant may use an internal control procedure unless the internal control procedure has been approved, in writing, by the executive director.
3. 68 IAC 13-1-1(b)(2) and (3) provides the Commission may initiate an investigation or a disciplinary action, or both, against a licensee if the Commission has reason to believe the licensee is not complying with licensure conditions or is not complying with this Act or this title.
4. Caesars Southern Indiana approved internal control procedures, E-33, describe the procedures for Child Support Intercept Process.
5. Gaming Agents conducted an audit of the Child Support Arrears Delinquency Registry (CSADR) for July 2022. The results of this audit found two (2) individuals were not searched through the CSADR system at the time a taxable jackpot was won.
6. Gaming Agents conducted an audit of the Child Support Arrears Delinquency Registry (CSADR) for August 2022. The results of this audit found two (2) individuals were not searched through the CSADR system at the time a taxable jackpot was won.
7. Gaming Agents conducted an audit of the Child Support Arrears Delinquency Registry (CSADR) for September 2022. The results of this audit found two (2) individuals were not searched through the CSADR system at the time a taxable jackpot was won.

## COUNT II

8. 68 IAC 11-7-1(b) provides for the purposes of this rule, "sensitive keys" means keys that either management or the commission considers sensitive to the casino licensee's operation and therefore require strict control over custody and issuance.
9. 68 IAC 11-7-3(b) provides that sensitive keys shall be returned to custody and signed in by the same occupational licensee they were issued to unless there is a documented change of shift.
10. On September 17, 2022, Surveillance notified Gaming Agents that a Table Games Supervisor took sensitive keys off property. The sensitive key was for the playing card drawer that contained playing cards and shoes of playing cards to be used during the gaming day. The Table Games Supervisor exited back of house via an elevator and did not exit through a set of doors that had a sensitive key alarm sensor. The keys were off property for approximately one (1) hour and thirty-five (35) minutes. This key set also included other table game keys.
11. On September 30, 2022, Surveillance notified Gaming Agents that a table games sensitive key was taken off property by a Table Games Supervisor. The sensitive key was off property for approximately two (2) hours and five (5) minutes. The Table Game Supervisor exited the property from a set of doors that were not alarmed.

## COUNT III

12. 68 IAC 15-10-5 provides the casino licensee shall establish policies and procedures for the even exchange of funds between two (2) casino cashiering areas or between a casino cashiering area and change banks, which shall include the following: (1) A designation of the occupational licensee who may process the even exchange transaction. (2) A description of the even exchange form and the required information and signatures. The form shall be at least a two (2) part form. (3) A description of the distribution of each part of the form. (4) Types of items allowed to be exchanged. (5) Requirement that security personnel must accompany the transfer of the funds between locations. (6) Any other policy or procedure deemed necessary by the executive director or commission to ensure compliance with IC 4-33, IC 4-35, and this title.
13. Caesars Southern Indiana's approved internal control procedures, M-12.17, describe the Chip Replenishment procedures.
14. On August 5, 2022, Surveillance notified the Gaming Agents that a Poker Supervisor advised Surveillance that his bank was \$1,000 over. The variance occurred during an even exchange between the Cage and the Poker Bank. A review of surveillance coverage determined that the Cage Cashier issued \$16,000 in purple \$500 chips when the poker exchange form only requested \$15,000. The Poker Supervisor accepted the even exchange. The even exchange was not properly verified.

15. Caesars Southern Indiana's approved internal control procedures, G-16, describes the procedures for even exchanges.
16. On October 21, 2022, Surveillance notified the Gaming Agents that an even exchange between the Cage and the Poker Bank was incorrect. The even exchange requested was for \$52,885, however, the Cage Cashier prepared the even exchange for \$57,885. The \$5,000 overpayment was not discovered until the monies had been take to the Poker Bank. The even exchange was not properly verified.
17. 68 IAC 15-12-4(3) provides that surveillance shall be notified that a live gaming device credit is being processed.
18. Caesars Southern Indiana's approved internal controls, C-11, describe the procedures for computerized table games credits.
19. On August 10, 2022, Surveillance notified Gaming Agents that a Cage Cashier failed to notify surveillance prior to processing a table credit.
20. 68 IAC 15-12-3(c) provides if a live gaming device fill slip was erroneous, it shall be voided and a new live gaming device fill slip generated. The person voiding the fill slip shall indicate the reason the slip was voided and sign the slip. A voided live gaming device fill shall be retained and deposited into a locked accounting box.
21. On September 4, 2022, Surveillance notified Gaming Agents that a Cage Cashier processed an incorrect table fill. The table fill was short by \$400.00 red \$5 chips. The table fill was corrected without properly voiding the table fill.

### TERMS AND CONDITIONS

Commission staff alleges that the acts or omissions of Caesars Southern Indiana by and through its agents as described herein constitute a breach of IC 4-33, IC 4-38, 68 IAC, and/or Caesars Southern Indiana's approved internal control procedures. The Commission and Caesars Southern Indiana hereby agree to a monetary settlement of the alleged violations described herein in lieu of the Commission pursuing formal disciplinary action against Caesars Southern Indiana.

Caesars Southern Indiana shall pay to the Commission a total of \$15,000 (\$6,000 for Count I, \$5,000 for Count II and \$4,000 for Count III) in consideration for the Commission foregoing disciplinary action based on the facts specifically described in each Count of this Agreement. This Agreement extends only to those violations and findings of fact specifically alleged in the findings above. If the Commission subsequently discovers facts that give rise to additional or separate violations, the Commission may pursue disciplinary action for such violations even if the subsequent violations are similar or related to an incident described in the findings above.


Upon execution and approval of this Agreement, Commission staff shall submit this Agreement to the Commission for review and final action. Upon approval of the Agreement by the Commission, Caesars Southern Indiana agrees to promptly remit payment in the amount of \$15,000 and shall waive all rights to further administrative or judicial review.

This Agreement constitutes the entire agreement between the Parties. No prior or subsequent understandings, agreements, or representations, oral or written, not specified or referenced within this document will be valid provisions of this Agreement. This Agreement may not be modified, supplemented, or amended, in any manner, except by written agreement signed by all Parties.

This Agreement may be executed in multiple counterparts, each of which shall be deemed an original agreement and both of which shall constitute one and the same agreement. The counterparts of this Agreement may be executed and delivered by electronic mail, facsimile, or other electronic signature by either of the parties and the receiving party may rely on the receipt of such document so executed and delivered electronically as if the original had been received.

This Agreement shall be binding upon the Commission and Caesars Southern Indiana.

IN WITNESS WHEREOF, the Parties have signed this Agreement on the date and year as set forth below.

  
\_\_\_\_\_  
Greg Small, Executive Director  
Indiana Gaming Commission

  
\_\_\_\_\_  
Bradley Seigel, Senior VP & GM  
Caesars Riverboat Casino, LLC

12/14/2022  
Date

12-6-22  
Date