

**BEFORE THE CASINO CONTROL COMMISSION
STATE OF OHIO**

IN THE MATTER OF:	:	
	:	Case No. 2013-075
CENTRAL OHIO GAMING VENTURES, LLC	:	
CASINO OPERATOR LICENSEE'S	:	
GRANTING CASINO CREDIT	:	
TO PATRONS	:	

SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between Central Ohio Gaming Ventures, LLC, ("Hollywood") and the Ohio Casino Control Commission ("Commission") for the purpose of resolving Commission Case No. 2013-075 and the issues that arose regarding Hollywood's practices and procedures for granting casino credit to patrons. Together, Hollywood and the Commission are referred to as "the parties."

WHEREAS, the Commission is responsible for the administration and enforcement of R.C. Chapter 3772 and the Ohio Adm. Code rules adopted thereunder, which regulate the conduct of casino gaming in the State of Ohio;

WHEREAS, Hollywood is a Casino Operator Licensee that operates Hollywood Casino Columbus, the casino facility located in Franklin County, Ohio;

WHEREAS, the Commission, pursuant to its authority to regulate, investigate, and penalize casino operators and managers, discovered violations of Ohio law and Hollywood's internal controls during its auditing procedures of Hollywood's operations;

WHEREAS, in light of that investigation, the Commission issued a Notice of Violation and Opportunity for Hearing ("Notice"), dated December 31, 2013, to Hollywood, pursuant to and in accordance with R.C. Chapters 119 and 3772 and Ohio Adm. Code Chapters 3772-21 and 3772-22;

WHEREAS, in response to the Notice, Hollywood submitted a written response on January 24, 2014, to the Commission wherein Hollywood acknowledged receipt of the Notice and waived its right to a hearing pursuant to R.C. 119.07 and 3772.04.

WHEREAS, the Commission procedurally complied with R.C. Chapters 119 and 3772 and established jurisdiction over this matter; and

WHEREAS, the parties enter this Agreement in lieu of issuance of a final adjudicatory order by the Commission.

NOW THEREFORE, in consideration of the mutual promises expressed herein, and with intent to be legally bound, the parties **AGREE** as follows:

1. Hollywood makes the following admissions:
 - A. During a routine audit of the procedures by which Hollywood grants credit to patrons, Commission staff discovered practices that violated Ohio law and Hollywood's internal controls.
 - B. As a result of this discovery, the Commission issued the Notice (attached as Exhibit A), providing Hollywood with an opportunity for a hearing to contest the allegations contained in the Notice.
 - C. Hollywood subsequently submitted a written response on January 24, 2014, (attached as Exhibit B) to the Commission wherein Hollywood acknowledged receipt of the Notice and waived its right to a hearing.
 - D. By granting credit to patrons without first obtaining all required information and maintaining incomplete credit files, Hollywood violated Ohio Adm. Code 3772-10-03(C), 3772-10-17(E), and 3772-10-23.
 - E. Hollywood and its personnel authorized "This Trip Only" credit extensions beyond their authority, in excess of the Commission-approved limit and before the limit had been exhausted, and did not properly record these extensions in its casino management system, in violation of Ohio Adm. Code 3772-10-03(C), 3772-10-17(E), and 3772-10-23.
 - F. Hollywood failed to maintain all documents related to its granting of credit, in violation of Ohio Adm. Code 3772-3-05(B) and 3772-10-17(E).
 - G. Hollywood did not ensure that its personnel was properly trained in all policies, procedures, and internal controls relevant to each employee's individual function, as it relates to records retention and granting credit, including but not limited to, whether an employee has the authority to grant credit, in violation of Ohio Adm. Code 3772-10-03(C).
 - H. Hollywood failed to comply with its own internal controls concerning the granting of credit to patrons and records retention and therefore acted outside the


scope of operation authorized by the Commission pursuant to Ohio Adm. Code 3772-10-02.

2. Pursuant to this Agreement, Commission Case No. 2013-075 is **ADMINISTRATIVELY CLOSED**. Accordingly, the Commission makes no specific findings regarding the allegations described in the Notice.
3. The admissions contained in Paragraph 1 of this Agreement by themselves will not be a basis for future action against Hollywood, except as set forth in Paragraph 4 of this Agreement. The Commission makes no further statements or representations with respect to the admissions referenced herein or Hollywood's compliance with Ohio law.
4. Nothing in this Agreement precludes the Commission from investigating and prosecuting Hollywood for violations of or non-compliance with this Agreement or for separate violations of or non-compliance with R.C. Chapter 3772 or the rules adopted thereunder or limits the Commission's exercise of authority and discretion with respect to imposing additional conditions upon or taking further action against Hollywood under R.C. Chapter 3772 and the rules adopted thereunder for matters not contemplated herein.
5. Since receiving the Notice, Hollywood has fully cooperated with Commission Staff and has taken remedial measures to correct the violations described in Paragraph 1 of this Agreement, including, but not limited to, suspending all incomplete credit files and ensuring that all incomplete credit files remain suspended until such time that all required documentation is added to each credit file.
6. Hollywood implemented Commission-approved internal controls that detail a process, including specific internal audits, by which Hollywood will certify that it has complied with Ohio Adm. Code 3772-3-05, 3772-10-17(E), and 3772-10-23 when it grants credit to patrons.
7. Hollywood will not implement any further remedial measures unless it has received approval to do so by the Commission.
8. Hollywood will pay a monetary fine in the amount of \$75,000.00.
9. Hollywood will ensure that its personnel is trained in all laws, policies, procedures, and internal controls relevant to each employee's individual function, including developing special remedial training relating to the granting of credit to patrons and the retention of records pertaining thereto, as required by Ohio Adm. Code 3772-10-03(C).

10. Upon the date of the last signature of all requisite parties and individuals, this Agreement is effective and binding upon the parties and any and all successors, assigns, subsidiaries, agents, employees, or representatives of the parties or any other affiliates.
11. The parties have read and understand this Agreement and have entered into the same knowingly, voluntarily, and with the opportunity to gain advice of counsel.
12. This Agreement is entered into by both parties and may be executed in counterparts or facsimiles, each of which shall be deemed an original and all of which shall constitute the same instrument.
13. This Agreement (including all attached exhibits) contains the entire agreement between the parties with respect to the subject matter hereof and supersedes all prior agreements and understandings, oral or written, with respect to such matters. This Agreement may be modified only by a further writing that is duly executed by both parties.
14. If any provision in this Agreement is found or held to be invalid or unenforceable, the meaning of said provision will be construed, to the extent feasible, so as to render the provision enforceable, and if no feasible interpretation shall save such provision, it will be severed from the remainder of this Agreement. The remainder of this Agreement shall remain in full force and effect unless the severed provision is essential and material to the rights or benefits received by either of the parties.
15. This Agreement shall be governed by and construed in accordance with the laws of the State of Ohio and the exclusive venue for any cause of action arising herefrom shall be brought to a court of competent jurisdiction in the State of Ohio, County of Franklin.

IN WITNESS WHEREOF, the parties to this **SETTLEMENT AGREEMENT** have either executed it or caused it to be executed by their duly authorized representatives:

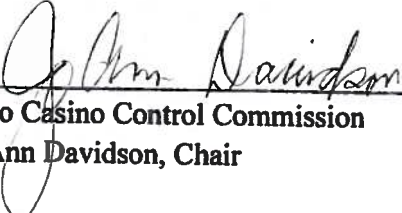
Accepted by:



Central Ohio Gaming Ventures, LLC
By: Ameet Patel, General Manager

2/28/14

Date



The Ohio Casino Control Commission
By: Jo Ann Davidson, Chair

3/19/14

Date