

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

IN THE MATTER OF	:	
	:	Case No. 2022-REG-002
The United States Playing Card Company,	:	
Playing Cards Violations.	:	

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between The United States Playing Card Company (“USPC”) and the Ohio Casino Control Commission (“Commission”) for the purpose of resolving Commission Case No. 2022-REG-002. Together, USPC 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 rules adopted thereunder, which regulate the conduct of casino gaming in the State of Ohio;

WHEREAS, USPC is a Gaming-Related Vendor Licensee that manufactures and sells playing cards to casino facilities in Ohio;

WHEREAS, the Commission, pursuant to its authority to regulate, investigate, and penalize gaming-related vendors, discovered violations of Ohio law during the course of normal daily operations at casino facilities;

WHEREAS, as a result of this discovery, the Commission issued a Notice of Violation and Opportunity for Hearing (“Notice”), dated January 25, 2022, to USPC, pursuant to and in accordance with R.C. Chapters 119 and 3772 and Ohio Adm. Code Chapter 3772-22;

WHEREAS, in response to the Notice, USPC submitted a letter to the Commission dated February 23, 2022 wherein USPC acknowledged receipt of the Notice and timely requested 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, Commission Case No. 2022-REG-002 has not yet been brought before the Commission for final adjudication, as required by R.C. Chapters 119 and 3772, and 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. USPC Admissions
 - A. During normal daily operations, Commission staff discovered practices that violated Ohio law.
 - B. As a result, the Commission issued the Notice, Case No. 2022-REG-002, providing USPC with an opportunity for a hearing to contest the allegations.
 - C. USPC submitted a letter to the Commission dated February 23, 2022 wherein USPC acknowledged receipt of the Notice and requested a hearing on the allegations contained therein.
 - D. Playing Card Violations:
 - i. USPC manufactured, shipped, or delivered non-compliant poker playing cards for use in an Ohio casino, in violation of Ohio Adm.Code 3772-11-20(C)(3);
 - ii. USPC manufactured, shipped, or delivered non-compliant table game playing cards for use in an Ohio casino, in violation of Ohio Adm.Code 3772-11-20(C)(4); and
 - iii. USPC manufactured, shipped, or delivered table game playing cards that did not match approved artwork, in violation of Ohio Adm.Code 3772-11-20(A).
2. Pursuant to this Agreement, Commission Case No. 2022-REG-002 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 itself will not be a basis for future action against USPC, except as set forth in Paragraph 4 of this Agreement. The Commission makes no further statements or representations with respect to the admissions referenced or USPC's compliance with Ohio law.
4. Nothing in this Agreement precludes the Commission from:
 - a. Investigating and prosecuting USPC 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
 - b. Limits the Commission's exercise of authority and discretion with respect to imposing additional conditions upon or taking further action against USPC under


R.C. Chapter 3772 and the rules adopted thereunder for matters not contemplated in this Agreement.

5. USPC will pay a monetary fine in the amount of \$50,000.00.
6. USPC will ensure, and demonstrate to the Commission, that its casino operations personnel are properly trained on all laws and company policies or procedures relevant to each employee's individual function, as it relates to the admissions in Paragraph 1 and to the production of gaming-related equipment compliant with Ohio law.
7. USPC will ensure, and demonstrate to the Commission, that its equipment and procedures are sufficient to facilitate the production of gaming-related equipment compliant with Ohio law.
8. Upon the date of the last signature of the parties, 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.
9. 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.
10. This Agreement is entered into by the parties and may be executed in counterparts or facsimiles, each of which will be deemed an original and all of which will constitute the same instrument.
11. This Agreement contains the entire agreement between the parties with respect to the subject matter and supersedes all prior agreements and understanding, oral or written, with respect to such matters. This Agreement may be modified only by a further writing that is duly executed by the parties.
12. The provisions of this Agreement are severable and independent; and, if any provision is determined to be unenforceable, in whole or in part, the remaining provisions and any partially enforceable portion of the subject is nevertheless binding and enforceable.
13. This Agreement is governed by and construed in accordance with the laws of the State of Ohio, and the exclusive venue for any cause of action arising from it will be a court of competent jurisdiction in the State of Ohio, County of Franklin.

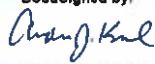
(Remainder of page intentionally left blank; Signature page follows)

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:

DocuSigned by:

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The United States Playing Card Company
By: Tricia Bouras, CEO and President

August 1, 2022
Date

DocuSigned by:

599148C89819408...
The United States Playing Card Company
By: Andrew J. Krol, VP of Finance

August 1, 2022
Date


Ohio Casino Control Commission
By: June E. Taylor, Chair

Aug. 17, 2022
Date