

IOWA RACING AND GAMING COMMISSION

MINUTES

AUGUST 27, 2026

The Iowa Racing and Gaming Commission (IRGC) met on Thursday, August 27, 2026 at Riverside Casino and Golf Resort in Riverside, Iowa. Commission members present were Amy Burkhardt, Chair and members Linda Upmeyer, Kirk Nielsen, and Michael Boal. Commissioner Alan Ostergren was absent.

APPROVE AGENDA: Chair Burkhardt called the meeting to order at 8:30 AM and requested a motion to approve the agenda. Commissioner Nielsen moved to approve the agenda as submitted. Commissioner Boal seconded the motion, which carried unanimously.

APPROVE MINUTES: Chair Burkhardt requested a motion to approve the minutes from the June 24, 2026 Commission meeting. Commissioner Nielsen moved to approve the minutes as presented. Commissioner Upmeyer seconded the motion, which carried unanimously.

WELCOME: Damon John, General Manager of Riverside Casino and Golf Resort, was joined by Brandon Hamilton, President of the Washington County Riverboat Foundation (WCRF). On behalf of their 700 employees, Mr. John welcomed everyone back to Riverside and hoped everyone enjoyed their stay. The second floor of the hotel is currently being refreshed 15 rooms at a time, and that project will be completed in 2027.

Riverside celebrated their 20th year of operations in August by holding back-to-back concerts with over 10,000 guests in attendance. They will conclude their celebration by giving away a new Mercedes-Benz to one lucky resort club member. Mr. John and his team looked forward to showcasing their property, guest service, food, and entertainment. Their staff's commitment to excellence extended into their local community, winning the Governor's Give Back Iowa challenge for the ninth year in a row. Their employees average more volunteer hours per person than any company of a similar size.

Mr. John then turned it over to Mr. Hamilton to share the work of the WCRF. He was honored to showcase the partnership between Riverside, the WCRF, and the communities they serve. Over the past 20 years, the foundation awarded over \$80 million to nonprofits and community organizations in Washington County and the surrounding area. Those funds have supported schools, strengthened nonprofits, preserved important institutions, and made major projects possible, such as the Herbert Hoover Presidential Library Museum. The \$1 million grant went to revitalization efforts, and they held a grand re-opening in July. There was also a \$2 million grant awarded to the Riverside Wellness Center and a \$2.4 million grant for PAWS & More animal shelter.

Mr. Hamilton thanked the Commissioners for the opportunity to demonstrate how gaming revenue is reinvested in the region to improve and strengthen communities. He also extended an invitation

to the WCRF's 20th celebration of giving, with a formal invite being sent in the near future. Chair Burkhart thanked them both.

ANNOUNCEMENTS: Tina Eick, Administrator of IRGC, stated there is no Commission meeting in September. The Commission will next meet on October 15, 2026 at Q Casino in Dubuque, IA. Submissions for that meeting are due in the Commission's Des Moines office by October 1, 2026. The Commission will then meet at Hard Rock Casino and Resort in Sioux City on November 19, 2026.

Ms. Eick took a moment to recognize Commission Gaming Representatives Scott Ditch and Tori Aplara for their work to ensure that gaming in Iowa is operating with integrity and in compliance with Iowa laws.

ADMINISTRATIVE RULES EXECUTIVE ORDER 10 REVIEW: Ms. Eick provided an informational review of the Commission's progress in complying with Executive Order 10.

The rules were drafted and submitted in July, with public hearings held on Tuesday, August 25th. Staff received a fair amount of feedback from all parts of the industry. Ms. Eick thanked those who sent in feedback. Staff will review the comments and determine if changes can be made or if additional feedback is needed. Staff received feedback regarding the sections for RTAs and cybersecurity initiatives, which will also need some time to review.

Ms. Eick wanted to note that some items were removed as they were already contained in the statute, in order to reduce repetitive rules. Other rules were combined and rearranged to comply with the directive to simplify rules where possible.

The rules are still on-track to proceed with a Notice of Intended Action at the October Commission meeting and work through the process until the end of the year.

Chair Burkhart thanked Ms. Eick for providing the comments to the Commissioners. Commissioner Boal noted that cybersecurity was a particular interest of his, and that he would like to learn more from the industry about what current practices are and whether an annual review could be more appropriate given the pace of change in cyber threats. He expressed concerns that cyber security often isn't paid much attention until it's too late, and he would like to have a conversation about whether or not the current rules keep up with threats.

Commissioner Nielsen said it would be insightful for the Commission, industry personnel, stakeholders, and DCI to look at how these rules impact all areas. Commissioner Upmeyer agreed and added that the Commission wants to ensure the work can be done effectively while still maintaining the necessary oversight and regulatory responsibility.

Chair Burkhart noted that the feedback received is very different from the proposed rules regarding the RTA process and the cybersecurity requirements. Since the deadline to complete the rules is approaching, she asked if the rules can be passed as they are to comply with the Executive Order 10 deadline and then updated at a later date through the regular rulemaking cycle.

Ms. Eick said that it was possible, though there may be some comments from the legislative rules review committee, and they will ultimately determine if that is an acceptable proposition.

Commissioner Burkhart also wanted to address some of the comments. Regarding the RTAs, she reiterated that the RTA process has helped her to better understand the industry. She is concerned that, if all contracts are presented at renewal time, the Commissioners run the risk of losing touch with what is happening in the industry. She noted that the Commission is often called upon to speak about the impacts that the facilities make throughout the state, and one of the major impacts is how money is spent.

She also wanted to address the increase of the RTA threshold to \$150,000. She wanted to clarify that the new amount was based off of the original threshold (\$50,000), then adjusted for inflation. She encouraged anyone who had additional questions to reach out the Commissioners to discuss.

DUBUQUE RACING ASSOCIATION, LTD (dba Q Casino):

Request for Approval of Material Debt Transaction:

Lance Carnahan, Vice President & General Manager, presented the line of credit approval request for Dubuque Racing Association, LTD.

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the material debt transaction request as submitted by Dubuque Racing Association, LTD contingent upon a copy of the final documents being provided to the Commission within 10 days of execution. Commissioner Nielsen seconded the motion, which carried unanimously.

CONTRACT APPROVALS (OSV – OUT OF STATE VENDOR; RP – RELATED PARTY):

Diamond Jo, LLC: Wendy Runde, General Manager, presented a contract with Performance Foodservice as a food supplier.

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Nielsen moved to approve the contract as submitted by Diamond Jo, LLC. Commissioner Boal seconded the motion, which carried unanimously.

Ameristar Casino Council Bluffs, LLC: Paul Czak, General Manager, presented the following contracts for Commission approval:

- CDW Direct, LLC – Slot Switches – Renewal of RTA #11406
- Council Bluffs Hotel Association, dba Kineth Hospitality Co – Hotel Rooms for Overflow Guests – Renewal of RTA #11273
- Dang LLC – Promotional Gift Cards (OSV)
- Doll Distributing, Inc – Beer Inventory & Services – Renewal of RTA #11275

- Dubuque Barge & Fleeting – Harbor Maintenance & Slip Dredging – Renewal of RTA #11276
- Global Consulting Solution (GCS) – Promotional Gift Cards
- Global Surveillance Associates – Digital Surveillance Equipment (OSV) – Renewal of RTA #11277
- Johnson Brothers Wine Company – Wine – Renewal of RTA #11279
- M & D McCullick, Inc – Vessel Rubberized Decking (OSV) – Renewal of RTA #11280
- Nebraska Furniture Mart – Furniture – Renewal of RTA #11281
- OMG Midwest Inc. dba Omni Engineering – Parking Lot Resurface – Renewal of RTA #11282
- Prairie Mechanical Corporation – Kitchen & HVAC Maintenance (OSV)

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the contracts as submitted by Ameristar Casino Council Bluffs, LLC. Commissioner Upmeyer seconded the motion, which carried unanimously.

Isle of Capri Bettendorf, L.C.: Nancy Ballenger, Senior Vice President and General Manager at the Isle Casino Waterloo, presented the following contracts on behalf of the Isle of Capri Bettendorf:

- Nestle USA Inc – Vendor for Starbucks Product
- Northwest Mechanical Inc – HVAC Maintenance contracts and property repairs
- People Ready – Temporary Labor for Banquets

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Upmeyer moved to approve the contracts as submitted by Isle of Capri Bettendorf, L.C. Commissioner Nielsen seconded the motion, which carried unanimously.

Harveys Iowa Management Company LLC (dba Harrah's Council Bluffs Casino & Hotel): Thomas Roberts, Senior Vice President and General Manager, presented the following contracts for Commission approval:

- Carberry Construction – Carpet Installation – Increase of RTA #12272
- Carley Construction – General Construction
- Cerris (formerly MMC Mechanical Contractors) – Mechanical Contractor for Changing Out Rooftop HVAC Units – Increase of RTA #12131
- Cerris (dba Evelyn DeWitt) – Mechanical Contractor
- 89.7 The River – Co-Promoter for Stir Concert Cove
- Thermogenics/Plains Mechanical – Work to Retube Boiler
- TH Construction – Emergency Plumbing and Remediation (OSV)

Chair Burkhart asked about the emergency plumbing and repairs. Mr. Roberts said the issue occurred underneath the bathrooms in the back of the facility. TH Construction have been very quick, reliable, and reasonably priced.

Hearing no further comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the contracts as submitted by Harveys Iowa Management Company LLC. Commissioner Nielsen seconded the motion, which carried unanimously.

Iowa West Racing Association (dba Horseshoe Casino Council Bluffs): Mr. Roberts presented the following contracts for Commission approval:

- Cerris – Mechanical Contactor – Increase of RTA #12148
- Cerris (dba Evelyn DeWitt) – Mechanical Contractor
- Elevate Roofing – West Porte-Cochere
- Oldcastle/Omni Engineering – Asphalt Vendor
- Performance Food Group (PFG) – Food Vendor

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Nielsen moved to approve the contracts as submitted by Iowa West Racing Association. Commissioner Boal seconded the motion, which carried unanimously.

Cedar Rapids Development Group, LLC (dba Cedar Crossing Casino & Entertainment Center): Kim Pang, Vice President and General Manager, presented the following contracts for Commission approval:

- Buzz Creative Group, LLC – Advertising, Creative Services, and Brand Strategy (RP) – Increase of RTA #12345
- Dubuque Networking Services – Networking Services – Increase of RTA #12544
- Eagle Gaming Services, LTD – Outside Specialist Slot Technicians for Initial Slot Machine Installation (OSV)
- McGrath Buick GMC Cadillac – Purchase of Company Vehicle for Casino Guests
- Melanie Olson Design Group – Procurement Services – Increase of RTA #12398
- Two Up Two Down – Entertainment Performance: Old Dominion (OSV)

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Upmeyer moved to approve the contracts as submitted by Cedar Rapids Development Group, LLC. Commissioner Boal seconded the motion, which carried unanimously.

Chair Burkhart asked for an update on the construction of the facility. Mr. Pang said they will be holding a job fair in September, and an all-team training is scheduled for October. They are still planning on opening their doors officially in November, and everything is coming along. They are posting frequently on social media. He had a good conversation the day prior with Tina and staff about slot testing and security plans, which he plans to provide at the October meeting.

Chair Burkhart noted that she had seen a press release of concerts posted and asked if there would be similar press release for the STEM lab and its exhibits. Mr. Pang said there would be a press release for that information as soon as he has more information. Chair Burkhart asked if the STEM lab would be ready on opening weekend, and Mr. Pang said that was what they were working towards.

Chair Burkhart thanked him for the update.

Great River Casino Resort, LLC: Don Ostert, General Manager, presented a contract with CDW LLC for hardware and software upgrades and licenses for Commission approval.

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Upmeyer moved to approve the contract as submitted by Great River Casino Resort, LLC. Commissioner Nielsen seconded the motion, which carried unanimously.

Grand Falls Casino Resort, LLC: Sharon Haselhoff, Regional Vice President and General Manager, presented the following contracts for Commission approval:

- Midwestern Mechanical – Water Pipe Repairs
- Wood Couture – Replacement of Hotel & Restaurant Chairs (OSV)

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the contracts as submitted by Grand Falls Casino Resort, LLC. Commissioner Nielsen seconded the motion, which carried unanimously.

Wild Rose Clinton, LLC: Steve Cody, General Manager of Wild Rose Emmetsburg on behalf of Steve Nauman, presented a contract with Martin Bros. Distributing Co. for food products for Commission approval.

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Nielsen moved to approve the contract as submitted by Wild Rose Clinton, LLC. Commissioner Boal seconded the motion, which carried unanimously.

Wild Rose Emmetsburg, LLC: Mr. Cody presented the following contracts for Commission approval:

- Martin Bros. Distributing Co. – Food Distributor – Replaces RTA #12025
- TK Elevator – Elevator/Escalator Monthly Maintenance Fees & Repairs

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the contracts as submitted by Grand Falls Casino Resort, LLC. Commissioner Upmeyer seconded the motion, which carried unanimously.

Dubuque Racing Association, Ltd (dba Q Casino): Mr. Carnahan presented a contract with Lish This, Inc. for an entertainment artist booking agency for Commission approval.

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Upmeyer moved to approve the contract as submitted by Dubuque Racing Association, Ltd. Commissioner Nielsen seconded the motion, which carried unanimously.

Diamond Jo Worth, LLC: Scott Smith, Vice President & General Manager, presented the following contracts for Commission approval:

- Wayne Transports – C-Store Fuel Delivery – Replaces RTA #11170
- John Boyer (dba Precision Signs, LLC) – Signage Projects (OSV) – Increase of RTA #12586
- Martin Brothers Distributing – Food and Food Products – Increase of RTA #11476
- PepsiCo – Property Soft Drink Vendor

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the contracts as submitted by Diamond Jo Worth, LLC. Commissioner Nielsen seconded the motion, which carried unanimously.

Riverside Casino and Golf Resort, LLC: Mr. John presented the following contracts for Commission approval:

- Capital Sanitary Supply – Environmental Services Supplies
- Keg 1 Iowa, LLC – Alcoholic Beverage Purchases

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the contracts as submitted by Riverside Casino and Golf Resort, LLC. Commissioner Upmeyer seconded the motion, which carried unanimously.

Prairie Meadows Racetrack and Casino, Inc.: Brian Ohorilko, President & CEO, presented the following contracts for Commission approval:

- Formation Group, Inc – Owners Representative Services to Oversee Construction
- Steelman Partners – Architectural and Conceptual Design Services (OSV)

Mr. Ohorilko explained that Prairie Meadows is in an exploratory phase regarding some changes. They have conducted an internal feasibility study and are hoping to move forward with that project and have a final draft before the Commission in late Q4 of 2026. If the design or scope of the project were to change drastically, Mr. Ohorilko said he would notify the Commission, but the amounts presented in their contracts today are the maximum amounts they intend to need. Their capital committee underwent an extensive process in order to select the architect who met their expectations regarding creativity and design. Mr. Ohorilko also said Prairie Meadows has made a tentative lease agreement with Polk County, which they will bring to the next meeting.

Chair Burkhart thanked him for giving Iowa vendors the opportunity to bid, as well as for providing the Commissioners with a thorough explanation of the process.

Commissioner Boal said it sounded like an exciting project and also thanked him for the thorough explanation documents, especially considering the size of the project.

Hearing no further comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the contracts as submitted by Prairie Meadows Racetrack and Casino, Inc. Commissioner Upmeyer seconded the motion, which carried unanimously.

HGI – Lakeside, LLC: David Monroe, General Manager, presented a contract with American State Bank for ATM and electronic services for Commission approval.

Mr. Monroe said that this contract was approved at the July 2026 meeting, but he was notified by American State Bank that they misunderstood their capabilities and were not able to allow patrons to exclude themselves from using the ATM terminal. Mr. Monroe notified Ms. Eick immediately that there was a misunderstanding and resubmitted their contract. American State Bank is an Iowa vendor that they have worked with for many years, and they have attempted to get the capability to allow individuals to exclude from the use of the ATM but have been unsuccessful. He is seeking guidance from the Commission on the best course of action going forward.

Chair Burkhart said she appreciated Mr. Monroe reaching out as soon as he realized there was a concern. She acknowledged that the Commission is responsible for both making sure Iowa vendors are given priority, as well as oversight of responsible gaming initiatives and recognized that there is some conflict therein. She felt that it is most important to hold the responsible gaming concerns, especially as it pertains to patrons' well-being.

Commissioner Nielsen, Commissioner Boal, and Commissioner Upmeyer agreed with Chair Burkhart's opinion that it is more important to have a vendor who can give patrons the option to self-exclude.

Mr. Monroe thanked the Commissioners for their input and withdrew the submission in light of the discussion.

HEARINGS:

Wild Rose Jefferson, LLC: Ms. Eick presented the Stipulated Agreement with Wild Rose Jefferson, LLC for violations of Iowa Code § 99F.4(22). This violation involved a self-exclusion violation.

A patron entered the facility after 11:00 PM and alerted a security staff member that she wanted to self-exclude at the end of the night. The staff member alerted the security supervisor and the patron reiterated her request to self-exclude at the end of the night. At 2:35 AM, the patron returned to the same security staff member and supervisor and indicated she was ready complete the self-exclusion process. The security supervisor advised the patron that he couldn't proceed with the self-exclusion, as it was very close to closing and he lacked the manpower. He instead advised her to come back at 10:00 AM the next morning. The patron left at 2:37 AM. Her

information was not taken down, and it is unknown if she ever completed the self-exclusion process. An incident report was provided to Commission staff by the surveillance department, and the security supervisor was terminated from employment at the facility.

Ian Wilkinson, General Manager of Wild Rose Jefferson, addressed the Commission regarding the incident. He was disappointed to be before the Commission for this incident and he apologized. He said the situation arose from a security supervisor blatantly disregarding operating procedures. He also stated that they take responsible gaming awareness very seriously, as well as the well-being of their patrons. After this incident, Wild Rose Jefferson updated their SOPs and implemented ongoing additional training for all staff to ensure incidents like this one don't happen again.

Hearing no further comments or questions, Chair Burkhart requested a motion. Commissioner Nielsen moved to approve the Stipulated Agreement with Wild Rose Jefferson, LLC for Count 1 with an administrative penalty of \$20,000. Commissioner Boal seconded the motion, which carried unanimously.

Chair Burkhart said that she appreciated that remedial steps had been taken, as this was an unfortunate but very serious lapse in judgement.

American Wagering, Inc. (dba Caesar's Sportsbook): Ms. Eick presented the Stipulated Agreement with American Wagering, Inc. for violations of Iowa Code § 99F.19(1) and (2) and § 99F.4(22). The first violation involved a failure to cross-reference patrons with W-2G taxable wins with the state's setoff database. This was discovered in April 2025. Commission staff then started an extended review of their taxable wins and checks of the state's setoff database. Between December 2024 and June 2025, about 34 patrons had taxable wins that were paid out prior to checking the state's setoff database. None of these patrons were shown to owe money when they were checked at a later date, but it is unclear if any of them had a setoff at the time of payment. The licensee received a prior written warning for a similar issue.

The second violation involved failing to download the updated self-exclusion database information in a timely manner. The download was due by May 26, 2025 and was not completed until May 27, 2025.

Jeff Hendricks, Assistant General Counsel for Caesar's Entertainment, addressed the Commission regarding the incident. In these cases, there were control structures in place, but human errors prevented those structures from being effective. He said it has been addressed with all relevant team members, and the procedures have been revised in an effort to ensure this doesn't happen again. He turned it over to Vince Argo, Head of Digital Operations for Caesar's Sportsbook, to further discuss the incidents.

Mr. Argo apologized for the incident and wanted to discuss their remediation steps. Since this incident occurred, they have replaced the majority of payments management team and hired a dedicated Director of Payment Regulation. They are excited to have her on their team, and she has already helped enhance their processes and training. They have also taken their existing SOPs

and updated their technology, including switching to an internal player account management system. He said there are further tech enhancements that are coming in the future to automate more of the process. He also said someone cross-checks the taxable wins on a daily basis as they come into the office. Their Director of Payment Regulation performs a weekly audit. On a monthly basis, senior leadership reviews the actions taken and addresses any issues that arise.

Mr. Argo discussed their training, which they take very seriously. They are working to enhance their overall training, and they are focusing on tech opportunities that will improve all procedures with Caesar Digital.

Commissioner Upmeyer thanked them for their prompt attention in both of these matters.

Hearing no comments or questions, Chair Burkhart requested a motion. Commissioner Upmeyer moved to approve the Stipulated Agreement as presented for Count 1 with an administrative penalty of \$20,000, and for Count 2 with an administrative penalty of \$10,000. Commissioner Nielsen seconded the motion, which carried unanimously.

SCE Partners, LLC (dba Hard Rock Casino Sioux Falls): Ms. Eick presented the Stipulated Agreement with SCE Partners, LLC for violations of Iowa Code § 99F.4(22). Both violations involved self-exclusion. The first violation involved two instances where self-exclusion forms were not uploaded timely into the statewide database. One was 17 days late and another was 402 days late. Consequently, one individual received 25 promotional mailings and the other individual received 52 promotional mailings.

The second violation involved individuals whose names were downloaded from the database but were not properly integrated into Hard Rock's local player system with the exclusion information. These were discovered during a proactive self-audit by the facility. One individual was able to reactivate their account and gamble. Hard Rock has paid the resulting \$29.81 to the state's general fund. None of the individuals were sent any marketing materials.

Doug Fisher, General Manager of Hard Rock Casino, acknowledged the failure to meet expectations regarding self-exclusion, which is a responsibility they take seriously. They fully understand the importance of these protections for both guests and the integrity of gaming in Iowa. Two years prior, they reached out to their corporate team and had them scrub their player records to ensure the database was clean. The results were less than optimal, and this prompted procedure changes, including a second sign-off by a compliance officer. This change was not implemented with self-excluded patrons. Since identifying this issue, there are now multiple layers of oversight, including dual review and approval processes, monthly database audits with their corporate compliance team, and creating an exclusion review team that meets weekly to review activity, verify compliance, and address any concerns right away. The exclusion review team includes their directors of marketing and security, their AGM, and Mr. Fisher. He apologized again on behalf of Hard Rock Hotel and Casino, and he appreciated the opportunity to address the concerns. They will use these incidents to strengthen their processes and hold themselves to a higher standard.

Commissioner Boal appreciated that the facility had been taking the initiative to self-audit and the efforts to ensure it doesn't happen again.

Hearing no further comments or questions, Chair Burkhart requested a motion. Commissioner Boal moved to approve the Stipulated Agreement as presented for Count 1 with an administrative penalty of \$10,000, and for Count 2 with an administrative penalty of \$5,000. Commissioner Nielsen seconded the motion, which carried unanimously.

BetMGM, LLC: Ms. Eick presented the Stipulated Agreement with BetMGM, LLC for violations of Iowa Code §§ 99F.9(4)“a” and § 99F.4 (22). The first violation involved account setup violations. In January of 2025, Commission staff issued guidance to all mobile sports book operators that new rules would be effective in March of 2025. These rules required specific authentications for new account registrations, including uploading both a valid government ID and a picture at the time of the account registration, in some instances. BetMGM notified Commission staff that, while they were collecting the government ID, they were not also collecting the applicant's picture at the time of the registration. They implemented a solution in November 2025. Between March and November, 375 individuals registered for accounts without the required picture taken at the time of registration. Of those accounts, 166 made over \$7000 in wagers, with the total stake of almost \$500,000.

The second violation involved an account violation regarding geolocation. In October 2025, BetMGM made a system configuration change that caused the mobile sportsbook's geolocation validation check to become inactive for approximately 12 hours. This was discovered by BetMGM's technical team, who were able to revert the configuration back. Upon investigation, four users who should have been blocked were able to place six bets, totaling \$55. Five additional users that should have been blocked due to device modification or other potential fraud detection safeguards related to geolocation were also able to place five wagers, totaling over \$3,500.

The third violation involved a self-exclusion violation. In June 2026, BetMGM reported that seven self-excluded individuals were sent promotional emails.

Joe Caputi, Senior Legal Counsel for BetMGM, addressed the Commission regarding the incidents and apologized for the incidents occurring. He stated that BetMGM recognizes the importance of all of these issues and they are committed to compliance with Iowa's requirements and regulations.

Regarding the account setup issues, Mr. Caputi stated that BetMGM notified the Commission immediately, and a change management request was submitted on October 30, 2025, and that change was approved and implemented by November 3, 2025. All 375 registrants that were not captured were required to complete that registration step the next time they log in before they can place wagers. Regarding the geolocation configuration, he stated the configuration was reverted back as soon as it was discovered, and the employee responsible had their access revoked. They are also no longer with the company. An additional technical check has been implemented, and any future geolocation changes must go through their change advisory board before they can be implemented. All affected patrons were made whole, and BetMGM worked with the Commission to correct the tax implications. Regarding the self-exclusion marketing material, Mr. Caputi

explained that a customer relations manager inadvertently turned off the scrubbing feature that normally removes excluded patrons when sending out emails. They have since worked with their vendor to ensure the scrubbing feature cannot be turned off.

He apologized again for being before the Commission for these issues, and he stressed that BetMGM takes these violations very seriously. They will continue to work with the Commission to remediate these issues, strengthen their controls, and to put a greater emphasis on compliance and understanding duties in every department.

Commissioner Nielsen thanked him for the thorough review and moved to approve the Stipulated Agreement as presented for Count 1 with an administrative penalty of \$10,000, and for Count 2 with an administrative penalty of \$10,000, and for Count 3 with an administrative penalty of \$30,000. Commissioner Upmeyer seconded the motion, which carried unanimously.

Chair Burkhart had a follow-up question regarding their marketing. On count three, she noted the 14-day period that scrubbing off and asked why excluded individuals were still in their database. Mr. Caputi said that, as he understood it, all customers stay in the database, as they could come off the self-exclusion list. There are also account markers that identify self-excluded individuals so staff can communicate with them appropriately.

Ms. Eick confirmed that there is an option to only self-exclude for five years or life.

Commissioner Nielsen asked if people could self-exclude in one state and not others in their system. Mr. Caputi said no, that if someone self-excludes, then that person would be banned by their platform across all states.

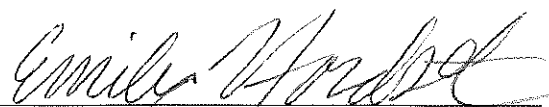
PUBLIC COMMENT: There were no public comments.

ADMINISTRATIVE BUSINESS: There was no administrative business.

ADJOURN: The Commissioners were invited by Elite Hospitality staff to view the new Blackjack Beach location immediately following the meeting.

Hearing no further business to come before the Commission, Chair Burkhart requested a motion to adjourn. Commissioner Upmeyer moved to adjourn the meeting at 9:28 AM. Commissioner Boal seconded the motion, which carried unanimously.

MINUTES TAKEN BY:


EMILY NORDSTROM