

Colorado Limited Gaming Control Commission

Minutes of Public Session

July 17, 2025

PUBLIC SESSION

I. Call to Order

Vice-Chair Tipton called the July 17, 2025, meeting of the Colorado Limited Gaming Control Commission (CLGCC or Commission) to order at 9:17 a.m. MDT in-person at the Division Office at 1707 Cole Blvd., Suite 300, Lakewood, CO 80401, and virtually via Zoom. Commissioners Hyland, Workman, and Faber were present, and a quorum existed.

Officials & Administrators in Attendance (all in person, unless noted otherwise)

John Tipton, Commissioner

Kevin Hyland, Commissioner

Phil Workman, Commissioner

John Faber, Commissioner

Michael Phibbs, Senior Director, Specialized Business Group

Christopher Schroder, Director

Kirsten Gregg, Chief of Investigations

Kenya Collins, Director of Administration via Zoom

Bradford Jones, Senior Assistant Attorney General

Torrey Samson, Senior Assistant Attorney General

Paul Hogan, Chief Auditor

J. Wolff, Agent in Charge, Central City/Black Hawk

Andrew Fulton, Agent in Charge, Sports Betting

Dane Albin, Agent in Charge, Cripple Creek

John Madruga, Agent in Charge, Background Unit

Michael Payne, Table Games Chair

Breanne Nolan, Executive Assistant, Secretary to CLGCC

II. Swearing in of Commissioner Faber

Vice-Chair Tipton introduced John Faber as the newest member of the CLGCC, filling the role of the corporate manager with five years of experience.

Commissioner Faber introduced himself and detailed his career experience in broadcasting and leadership development.

Christopher Schroder, Director, Division of Gaming, administered the oath of office and officially swore in Commissioner Faber as a member of the CLGCC.

III. Commissioner Elections Fiscal Year 2025-2026

Vice-Chair Tipton relinquished the floor to Senior Assistant Attorney General Bradford Jones to conduct the elections for the Chair and Vice-Chair of the CLGCC for fiscal year 2025-2026.

Senior Assistant Attorney General Jones opened nominations for the Chair. Commissioner Hyland nominated Commissioner Tipton for the role as Chair and Commissioner Tipton accepted the nomination. The Commission voted unanimously to elect Commissioner Tipton as Chair of the CLGCC for fiscal year 2025-2026. Chair Tipton stated that he appreciated the opportunity and commended Division staff for their hard work and was looking forward to the coming year.

Nominations for Vice-Chair were opened, and Chair Tipton nominated Commissioner Hyland. Commissioner Hyland accepted the nomination. The Commission voted unanimously to elect Commissioner Hyland as Vice-Chair of the CLGCC for fiscal year 2025-2026. Vice-Chair Hyland thanked his fellow Commissioners, as well as Division staff for their support.

EXECUTIVE SESSION

The Commission voted unanimously to go into Executive Session pursuant to sections 24-6-402(3)(a)(III), 44-30-521(1)(a), 44-30-526(1)(d), and 44-30-1507 of the Colorado Revised Statutes following a public vote by the Commission to enter into executive session in order to review confidential background licensing reports that are scheduled for consideration in the Public Session.

The Executive Session was called to order by Chair Tipton at 9:29 a.m. MDT.

PUBLIC SESSION (RECONVENED)

The Public Session was called back to order by Chair Tipton at 10:10 a.m. MDT.

IV. Consideration of the Stipulation and Agreement in the Matter of Crown CO Gaming, LLC d/b/a DraftKings – Case No. DOG24-004464

Torrey Samson, Senior Assistant Attorney General, presented the Stipulation and Agreement in the Matter of Crown CO Gaming, LLC d/b/a DraftKings – Case No. DOG24-004464.

Jake List, Director of Regulatory Operations at DraftKings, joined the meeting to respond to questions from the Commission.

Vice-Chair Hyland referenced an email that was sent out on May 20, 2024, by the Colorado Division of Gaming, notifying operators that bets were not to be taken on the November 15, 2024, “Paul v. Tyson Fight.” He asked why bets were taken by the operator, at all, when sufficient notice was given. Senior Assistant Attorney General Samson explained that there was a miscommunication by DraftKings staff, which resulted in the bets at issue.

Vice-Chair Hyland reiterated that several months’ notice was given to operators to not accept bets on the Paul v. Tyson Fight and asked Mr. List what happened in regard to timing when

accepting bets. Mr. List responded that DraftKings was aware of guidance given by the Division. He explained that wagering for Paul v. Tyson was offered on a different product and that filtering of content was not automatically applied to the fight and the manual compliance check to filter wagers was not completed.

Chair Tipton asked why the compliance check for Paul v. Tyson was not completed. Mr. List responded that for this pool wagering type, a manual check was required and the employee tasked with the compliance check did not complete it properly. He stated that as a part of remediation, a supervisory compliance check will be applied in addition to the manual employee compliance check. And, in the future, an automated check will be implemented.

Commissioner Faber asked how the training approach had changed following the incident. Mr. List explained that training had been issued to employees based on jurisdiction and that new training materials were being developed for continuing best practices.

The Commission voted to approve and authorize the Chair to sign and issue the: Stipulation and Agreement for Case No. DOG24-004464 in the matter of Crown CO Gaming, LLC d/b/a DraftKings, Temporary Internet Sports Betting Operator License No. 94433846.

V. Consideration of the Stipulation and Agreement in the Matter of Crown CO Gaming, LLC d/b/a DraftKings – Case No. DOG25-001965

Senior Assistant Attorney General Samson presented the Stipulation and Agreement in the Matter of Crown CO Gaming, LLC d/b/a DraftKings – Case No. DOG25-001965.

Jake List, Director of Regulatory Operations at DraftKings, was again present to answer questions from the Commission.

Commissioner Faber asked how the proposition bet error occurred given the robust history of taking wagers on college basketball in Colorado. Mr. List responded that this was another case of manual error. He stated that a trader erroneously created the proposition bet under a team proposition wager model, not player proposition wagers. The compliance team noticed the error and self-reported to the Division as soon as the wagers took place. He detailed that remedial training was provided to the employee, and additional manual checks could be implemented, but moving to an automated system was the long-term goal.

Commissioner Faber asked for the timeline from when the wager was posted, the game began, and then the wager was removed. Senior Assistant Attorney General Samson stated that the game occurred on or about March 23, 2025, and DraftKings self-reported the incident on March 24, 2025, and submitted an incident report to the Division on April 7, 2025.

Chair Tipton asked if a manual supervisory check was implemented following this incident. Mr. List confirmed that an alert was created in the system so that manually created bets were placed in a section of the site that generated an additional check. Chair Tipton asked who the system alerts would be sent to. Mr. List explained that the alerts will be submitted to the supervisory

team and then they will perform the additional checks. Commissioner Faber clarified that the alert goes to the trading team, which includes the supervisors.

Vice-Chair Hyland asked Senior Assistant Attorney General Samson how the fine amount was determined. She explained that, in determining the proposed fine amounts in the Stipulation and Agreement, the Division considered the number of bets, the self-reporting, and remediation efforts by DraftKings. Vice-Chair Hyland stated that he would have liked to see the fine amount doubled, as the violation was of great threat to integrity. Senior Assistant Attorney General Samson explained that the Commission can vote to amend the Stipulation and Agreement to increase the fine amount. Vice-Chair Hyland did not think the amendment was necessary but suggested that these integrity violations be penalized more harshly in the future.

Commissioner Workman concurred with Vice-Chair Hyland and stated that he would like the amount of the fine to be significant to the operator. Christopher Schroder, Director, Division of Gaming, stated that if the Division was not comfortable with the fine amount, the settlement would not have been agreed upon. He detailed that the proposal was discussed internally and warranted the fine based on the facts of the case.

Chair Tipton clarified the amounts of the fines for this Stipulation and Agreement, and for the previously approved Stipulation and Agreement. Commissioner Faber agreed with his fellow Commissioners and stated that the violation was serious. He expressed concerns with the description of the timeline of the violation and stated it was unreasonable if there was indeed correct supervision.

Mia Tsuchimoto, Compliance Program Manager of Sports Betting, Division of Gaming, stated that the violation was caught and reported within 24 hours, which demonstrated a reasonable timeline.

The Commission voted unanimously to approve and authorize the Chair to sign and issue the: Stipulation and Agreement for Case No. DOG25-001965 in the matter of Crown CO Gaming, LLC d/b/a DraftKings, Temporary Internet Sports Betting Operator License No. 94433846.

VI. Approval of Licensing Actions

The Commission voted unanimously to approve the renewal of the Manufacturer/Distributor and Operator licenses for Interblock USA L.C. and Incredible Technologies, Inc. These Manufacturer/Distributor and Operator licenses will expire two years from their current dates of expiration.

Vice-Chair Hyland called for a motion to approve the renewal of the Manufacturer/Distributor and Operator licenses for IGT and Aristocrat Technologies, Inc. Commissioners Workman and Faber approved the motion. Chair Tipton recused himself from the matter. These Manufacturer/Distributor and Operator licenses will expire two years from their current dates of expiration.

The Commission voted unanimously to approve the First Internet Sports Betting Operator license for Crown CO Gaming LLC d/b/a DraftKings. This Internet Sports Betting Operator license will expire two years from its date of issuance.

The Commission voted unanimously to approve the First Sports Betting Operator license for Crown CO Gaming LLC d/b/a DraftKings. This Sports Betting Operator license will expire two years from its date of issuance.

The Commission voted unanimously to table and continue the consideration of the application for First Sports Betting Operator license for Crown CO Gaming LLC d/b/a DraftKings, number 96827108, until the August Limited Gaming Control Commission meeting.

Vice-Chair Hyland called for a motion to approve the reissuance of the Vendor Major license for IGT. Commissioners Workman and Faber approved the motion. Chair Tipton recused himself from the matter. This Vendor Major license will expire two years from its current date of expiration.

In accordance with Commission Policy 24-01, the Commission voted unanimously to approve the First Issuance and Renewal of the Vendor Minor licenses listed in the Consent Agenda in the July 2025 public packet. These Vendor Minor licenses shall expire two years from their current dates of issuance or expiration.

VII. Opportunity for the Public to Address the Commission

The Chair gave anyone from the public the opportunity to address the Commission on any item that did not appear on the agenda.

Bill Curtis, Senior Director of Global Licensing, DraftKings, commended Division staff for their work during the licensing process. He specifically thanked investigators Matthew Yoder and Matthew Tanis, as well as Supervisor Donny Mitchell and Agent in Charge Andrew Fulton for their excellent work.

Vice-Chair Hyland asked Mr. Curtis if, in regard to the tabled matter of the First Sports Betting Operator license for Crown CO Gaming LLC d/b/a DraftKings, there was sufficient time given for DraftKings to provide documents by the August meeting. Mr. Curtis responded that the timeline was sufficient.

VIII. Consideration of Limited Gaming Financial Statements for May 2025

The Commission voted unanimously to approve the Statement of Gaming Revenues, Gaming Taxes, and Expenditures (unaudited) for the eleven months ending on May 31, 2025, and to authorize its distribution.

IX. Consideration of Division Sports Betting Financial Statement for May 2025

The Commission voted unanimously to approve the Statement of Sports Betting Revenues, Taxes, and Expenditures (unaudited) for the ten months ending on May 31, 2025, and to authorize its distribution.

X. Consideration of the Request for Addition to the Involuntary Exclusion List for John William Farrar

Michael Payne, Table Games Chair, presented the recommendation of Involuntary Exclusion for John William Farrar.

Discussion was had between the Commission and Table Games Chair Payne. Vice-Chair Hyland stated that, based on the assault and threats listed in the report for Mr. Farrar, this was conduct that should not be allowed in Colorado casinos. He was in support of involuntarily excluding Mr. Farrar to protect casino patrons.

Chair Tipton asked Senior Assistant Attorney General Bradford Jones if the Commission should include findings that Mr. Farrar has established for exclusion in its motion. Senior Assistant Attorney General Jones responded that was correct and that he would propose a motion for the Commission stating the basis for involuntary exclusion listed by the Division.

The Commission voted unanimously to approve the Division's petition to involuntarily exclude John William Farrar, based on reasons in petition and stated by Division, and directed the Commission's Attorney General representatives to prepare the order to memorialize the decision, which will be reviewed and signed by the Chair.

XI. Consideration of the Request for Addition to the Involuntary Exclusion List for Juhong Wu

Michael Payne, Table Games Chair, presented the recommendation of Involuntary Exclusion for Juhong Wu.

Senior Assistant Attorney General Bradford Jones asked to clarify two items for the record. He first asked Table Games Chair Payne if Ms. Wu would be placed on the Involuntary Exclusion list permanently. Table Games Chair Payne confirmed that the involuntary exclusion would be permanent. Senior Assistant Attorney General Jones asked if Ms. Wu was currently banned from other gaming jurisdictions. Table Games Chair Payne responded that the Division did not find any information regarding her exclusion from other jurisdictions.

Discussion was had between Chair Tipton and Senior Assistant Attorney General Jones regarding the criminal and civil charges against Ms. Wu.

At the request of the Commission, Senior Assistant Attorney General Jones proposed a motion and the Commission voted unanimously to approve the Division's petition to involuntarily exclude Juhong Wu, on a permanent basis based on the reasons listed in the Division's petition, and directed the Division's Attorney General representatives to prepare the order to memorialize the decision, which will be reviewed and signed by the Chair.

IX. Consideration of Organizational Matters

Approval of Minutes

The minutes from the April 17, May 22, and June 26, 2025 public sessions of the Colorado Limited Gaming Control Commission were approved, as presented.

Directors' Updates

Michael Phibbs, Senior Director, Specialized Business Group, stated that the remodel of the new Division office in Black Hawk (Richmond Building) was ongoing and that the move in was

scheduled for the fall of 2025. He stated that Division of Gaming investigators had been issued and were currently wearing uniforms. Senior Director Phibbs explained that divisions across the Department of Revenue were participating in ABLE training, in which investigators were learning how to handle situations with as little force as necessary. He concluded by explaining that the Specialized Business Group was finalizing contracts to implement new licensing software. He stated that the new software would be issued in approximately 18 months and that it was tailored to each Division's licensing needs.

Christopher Schroder, Director, Division of Gaming, welcomed Commissioner Faber and was pleased to announce that, following the swearing in of a new Commissioner at the August meeting, the Colorado Limited Gaming Control Commission would have its fifth and final member.

X. Adjournment

The Commission voted unanimously to adjourn the July 17, 2025, meeting of the Colorado Limited Gaming Control Commission at approximately 11:15 a.m. MDT.

Breanne Nolan, Secretary to the Colorado Limited Gaming Control Commission



August 20, 2025

CONSENT AGENDA

For the August 28, 2025, Colorado Limited Gaming Control Commission meeting

Dear Members of the Colorado Limited Gaming Control Commission,

The Division of Gaming submits this Consent Agenda for review and approval by the Colorado Limited Gaming Control Commission at its August 28th, 2025, meeting in accordance with Commission Policy 24-01 (approved March 29, 2024).

Under Commission Policy 24-01, the Commission may consider the listed matters as a group to be voted on and approved in mass upon a single motion. Upon a timely request, a Commissioner or the Director may remove any matter from the consent agenda for any reason. A request is timely if made prior to the vote on the consent agenda. If a matter is removed from this proposed consent agenda, then the Commission will consider and vote on the amended consent agenda before considering and voting on any removed matter(s) separately.

The Division proposes that the Commission approve the following new and renewal license applications for vendor minor sports betting licenses:

- *New Vendor Minor License for:*
 - American Affiliate Co. LLC

- *Renewal of the Vendor Minor Licenses for:*
 - 2749612 Ontario Inc. d/b/a Cashew Tech d/b/a Betstamp
 - Accertify, Inc.
 - Cape Media, LLC d/b/a dunkelindex; d/b/a betdecider; d/b/a njsportsbookreview
 - Carli Llyod.com Limited Liability Company
 - Digital Envoy, Inc. d/b/a Digital Element
 - ENTRAVISION DIGITAL N. AMERICA, LLC d/b/a ENTRAVISION DIGITAL NORTH AMERICA, LLC
 - Everything Media LLC
 - Firesand Limited d/b/a Firesand LLC
 - Mindway AI ApS d/b/a Mindway AI
 - Persona Identities, Inc.
 - Playersbest Inc.
 - Roky US Corp. d/b/a Roky
 - SwellShark, LLC
 - SUZOHAPP Gaming Solutions, LLC
 - THIMBA MEDIA LIMITED d/b/a SQUAWKA



COLORADO

Department of Revenue

Specialized Business Group—Gaming

1707 Cole Blvd., Suite 350
Lakewood, CO 80401

Respectfully,

Andrew Fulton,
Agent In Charge of Sports Betting and Fantasy Sports
Colorado Division of Gaming