

**BEFORE THE
PENNSYLVANIA GAMING CONTROL BOARD**

BETMGM, LLC	:	COMMONWEALTH OF
	:	PENNSYLVANIA
GID # 115293	:	
	:	PENNSYLVANIA GAMING
IN RE: INTERACTIVE GAMING	:	CONTROL BOARD
KNOW YOUR CUSTOMER	:	
REQUIREMENTS VIOLATIONS	:	DOCKET NO.

CONSENT AGREEMENT AND STIPULATION OF SETTLEMENT

THIS CONSENT AGREEMENT AND STIPULATION OF SETTLEMENT is made and entered into by the Commonwealth of Pennsylvania, Gaming Control Board (“Board”), Office of Enforcement Counsel (“OEC”), and BetMGM, LLC (“BetMGM”). OEC and BetMGM are collectively referred to as the “Parties;” and

WHEREAS, BetMGM is the holder of a Sports Wagering Operator License and an Interactive Gaming Operator License as approved by the Board in October 2020; and

WHEREAS, BetMGM provides interactive gaming services through BetMGM Casino as a skin on Mountainview Thoroughbred Racing Association, LLC, d/b/a Hollywood Casino at Penn National Racecourse interactive gaming certificate, provides interactive gaming services through Borgata Online as a skin on Sugarhouse HSP Gaming, LP, d/b/a Rivers Casino Philadelphia interactive gaming certificate and provides interactive sports wagering services through BetMGM Sports as a skin on Mountainview Thoroughbred Racing Association, LLC d/b/a Hollywood Casino Morgantown sports wagering certificate; and

WHEREAS, the Board’s Bureau of Investigations and Enforcement (“BIE”) is the investigative body established by 4 Pa.C.S. § 1517 (a) for the purpose of, *inter alia*, investigating licensees, permittees, registrants and other persons for potential violations of 4 Pa.C.S. § 1103 *et*

seq., known as the Pennsylvania Race Horse Development and Gaming Act (the “Act”), including potential violations referred to BIE by the Board or other persons; and

WHEREAS, OEC is the prosecutorial body established by 4 Pa.C.S. § 1517(a.2) and has the power and duty to initiate proceedings for administrative violations of the Act pursuant to section 1517(a.2)(1)(iii) of the Act; and

WHEREAS, pursuant to 4 Pa.C.S. § 1102(1), the primary object of the Act to which all other objectives and purposes are secondary is to protect the public through the regulation and policing of all activities involving gaming and practices that continue to be unlawful; and

WHEREAS, pursuant to 4 Pa.C.S. § 1102(8), "strictly monitored and enforced control over all limited gaming authorized by this part shall be provided through regulation, licensing and appropriate enforcement actions of specified locations, persons, associations, practices, activities, licensees and permittees"; and

WHEREAS, pursuant to 4 Pa.C.S. § 13B22(a), “Only a registered player who has first established an interactive gaming account shall be permitted to play an authorized interactive game or place a wager associated with an authorized interactive game. The interactive gaming account shall be in the name of a registered player and may not be in the name of any beneficiary, custodian, joint trust, corporation, partnership or other organization or entity”; and

WHEREAS, pursuant to 4 Pa.C.S. § 13B22(b)(1)(i)-(v), each interactive gaming account shall comply with the internal controls of the interactive gaming certificate holder that, at a minimum, require the filing and execution of an interactive gaming account application, the form of which has been preapproved by the board; proof of age, identity and physical address of the principal residence of the prospective interactive gaming account holder in a method approved by the board through regulation; electronic mail address and other contact information of the

prospective account holder, as the board or interactive gaming certificate holder may require; password or other secured identification provided by the interactive gaming certificate holder to access the interactive gaming account or some other mechanism approved by the board to authenticate the registered player as the holder to the interactive gaming account; and an acknowledgment under penalty of perjury that false or misleading statements made in regard to an application for an interactive gaming account may subject the applicant to civil and criminal penalties; and

WHEREAS, pursuant to 4 Pa.C.S. § 13B32(a), “each slot machine licensee who holds or has applied for an interactive gaming certificate in accordance with this chapter shall submit a description of its system of internal procedures and administrative and accounting controls for interactive gaming to the board, including provisions that provide for real-time monitoring, recordation or storage of all interactive games and a description of any changes to its procedures and controls. The submission shall be made at least 90 days before interactive gaming is to commence or at least 90 days before any change in those procedures or controls is to take effect, unless otherwise directed by the board” (*See also, 58 Pa. Code § 811a.2(a)*); and

WHEREAS, pursuant to 4 Pa.C.S. § 13B32(b), “Notwithstanding subsection (a), the procedures and controls may be implemented by an interactive gaming certificate holder upon the filing of the procedures and controls with the board”; and

WHEREAS, pursuant to 4 Pa.C.S. § 13B32(b)(4), procedures and control submissions shall include “Procedures for the registration of players and establishment of interactive gaming accounts, including a procedure for authenticating the age, identity and physical address of an applicant for an interactive gaming account and whether the applicant is a person prohibited from

establishing or maintaining an account under section 13B22 (relating to establishment of interactive gaming accounts)” (*See also, 58 Pa. Code § 811a.2(b)(4)*); and

WHEREAS, pursuant to 4 Pa.C.S. § 13B32(b)(8), procedures and control submissions shall include “Procedures for the crediting and debiting of a registered player's interactive gaming account” (*See also, 58 Pa. Code § 811a.2(b)(8)*); and

WHEREAS, pursuant to 4 Pa.C.S. § 13B32(b)(9), procedures and control submissions shall include “Procedures for cashing checks, receiving electronic negotiable instruments and for redeeming chips, tokens or other cash equivalents” (*See also, 58 Pa. Code § 811a.2(b)9*); and

WHEREAS, pursuant to 4 Pa.C.S. § 13B32(b)(10), procedures and control submissions shall include “Procedures for withdrawing funds from an interactive gaming account by the registered player” (*See also, 58 Pa. Code § 811a.2(b)(10)*); and

WHEREAS, pursuant to 4 Pa.C.S. § 13B32(b)(11), procedures and control submissions shall include “procedures for the protection of a registered player's funds, including the segregation of a registered player's funds from operating funds of the interactive gaming certificate holder”; and

WHEREAS, pursuant to 58 Pa.Code §812a.2(e) interactive gaming certificate holders or interactive gaming operators shall verify the player's identity and record the document number of the government-issued credential examined, or other methodology for remote, multisourced authentication, which may include third-party and governmental databases, as approved by the Board; and

WHEREAS, pursuant to 58 Pa.Code §812a.4(a) “A player shall have only one interactive gaming account for each interactive gaming certificate holder or interactive gaming operator. Each interactive gaming account must be nontransferable, unique to the player who establishes the

account, and distinct from any other account number that the player may have established with the interactive gaming certificate holder or interactive gaming operator for noninteractive gaming activity”; and

WHEREAS, pursuant to 58 Pa.Code §812a.7(a)(3), a player's interactive gaming account may be funded through the use of “a player's credit card or debit card, including prepaid cards”; and

WHEREAS, pursuant to 58 Pa.Code §812a.10(b), an interactive gaming certificate holder or interactive gaming operator shall prevent unauthorized withdrawals from an interactive gaming account; and

WHEREAS, pursuant to 58 Pa.Code §812a.10(c)(4) and (6), funds may be withdrawn from a player's interactive gaming account for a cash-out transfer to a player's reloadable prepaid cash card, which has been verified as being issued to the player and is nontransferable and cash-out transfers directly to the player's individual account with a bank or other financial institution (banking account) provided that the interactive gaming certificate holder or interactive gaming operator verifies the validity of the account with the financial institution; and

WHEREAS, pursuant to 58 Pa. Code §1408a.3(c)(4), sports wagering certificate holder’s or sports wagering operator’s internal controls submissions shall include the procedure to be utilized to ensure that money generated from the conduct of sports wagering is safeguarded and accounted for; and

WHEREAS, pursuant to 58 Pa. Code §1408a.8(b)(4)-(6), a sports wagering certificate holder's or sports wagering operator's internal controls must contain a description of its risk management framework including information regarding fraud detection, controls ensuring regulatory compliance and a description of anti-money laundering compliance standards; and

WHEREAS, BetMGM’s Board approved Internal Control § 812a.2, states “BetMGM shall additionally require secondary authentication to ensure the person providing identity information is truly the owner of the identity before they can initiate any activity including deposits, withdrawals, and wagering”; and

WHEREAS, BetMGM’s Board approved Internal Control § 812a.2, Exhibit A, states “Once SSN is verified, the system utilizes KYC solutions to validate the PII data to KYC verify patrons”; and

WHEREAS, BetMGM’s Board approved Internal Control § 812a.2, Exhibit A, states “BetMGM currently uses multiple KYC vendors to provide a fluid yet robust process when a patron initiates the creation of an account. BetMGM’s process aggregates the patron’s registration data and then uses the KYC vendors to ensure the identity of the patron and verify their full 9-digit Social Security Number (SSN). Five (5) attempts can be made by a patron to amend registration details before the system requests a manual upload of identifying documents”; and

WHEREAS, BetMGM’s Board approved Internal Control § 812a.2, Exhibit A, states “Until the verification process is satisfactorily completed, the patron is not permitted to deposit on the account”; and

WHEREAS, BetMGM’s Board approved Internal Control § 812a.7, states that player’s interactive gaming account may be funded through the use of a player’s credit or debit card, including prepaid cards; and

WHEREAS, BetMGM’s Board approved Internal Control § 812a.7, states that BetMGM shall not accept or facilitate a wager from a person who BetMGM knows or reasonably should know is placing the wager in violation of State or Federal law; and

WHEREAS, this is the first Consent Agreement of this nature since BetMGM’s initial licensure by the Board in October 2020; and

WHEREAS, the Parties do not dispute the jurisdiction of the Board; and

WHEREAS, the Parties now seek to enter into this Consent Agreement as a compromise of any disputed claims and in consideration of the Parties waiving, releasing, and forbearing any regulatory dispute; and

NOW, THEREFORE, the Parties stipulate and agree, and present to the Board for its consideration, the following:

STIPULATION OF FACTS

COUNT #1

(Inv. ID #115293-E11024-24)

The Board’s Bureau of Investigations and Enforcement (“BIE”) conducted an investigation into a fraud ring that was active on the BetMGM interactive wagering platform (“BetMGM Platform”) from December 9, 2021 through January 18, 2024. The fraud ring, which was perpetrated by unidentified suspects, created a total of 1,567 accounts on the BetMGM Platform using the personal identifying information of other individuals. Of these accounts, 1,173 made deposits totaling \$13,761. The fraud ring accounts were issued bonuses totaling \$12,172 in free casino play and \$194,101 in free sports play. The total amount wagered by the fraud group was \$229,580.36, consisting of \$20,985.98 in casino wagers and \$208,594.38 in sports wagers. The total amount of winnings was \$188,152.47, consisting of \$22,779.79 in casino winnings and \$165,372.68 in sports winnings. A total of 481 accounts completed withdrawals totaling \$128,608.48. Five (5) financial instruments were used by two (2) accounts for withdrawals totaling

\$2,529. There are 557 accounts with a remaining balance totaling \$18,061.07. There were no chargebacks filed for any of the fraud ring accounts.

This fraud ring was identified through a series of hallmarks commonly associated with fraudulent accounts created using the personal identifying information of other individuals for the purposes of bonus abuse and/or utilizing stolen or fraudulent payment devices. A common theme of the fraud ring was that a majority of the linked accounts deposited \$10, immediately followed by gaming activity (casino and/or sportsbook) and withdrew using the same financial instrument that was used for the deposit. These accounts were linked through shared registration details such as phone numbers, financial instruments used for depositing and withdrawing funds, shared devices, shared IP addresses, and common geolocation activity.

Two (2) accounts were created using the personal identifying information of deceased individuals. A total of 304 accounts shared a phone number. A total of 806 accounts were accessed from the same IP address. A total of 1,302 devices were utilized by the fraud ring accounts. Forty-eight (48) devices were shared by two (2) or more players and three (3) of those devices had five (5) or more users. Geolocation data indicated the primary location of the fraud ring's activity occurred in or around three (3) locations, none of which are known to be associated to any of the accounts associated with the fraud ring. The majority of the accounts had an out-of-state registered address, with 994 addresses from California and only 49 accounts having a Pennsylvania address. Also, while none of the accounts shared email addresses, a vast majority of the emails had characteristics indicative of being fraudulent.

Of the financial instruments used, 228 were shared by at least two (2) accounts. One (1) PayWithMyBank account was shared by 26 players. In total, 559 accounts shared a financial instrument with at least one (1) or more account. Only four (4) financial instruments had a full

Address Verification Service (“AVS”) match, four (4) financial instruments had a partial AVS match, and 567 financial instruments had no AVS match. The remaining financials are either not supported by AVS or BetMGM reported having no AVS results.

In response to this incident, as of January 8, 2025, BetMGM closed all associated accounts and blocked 33 associated devices.

COUNT #2

(Inv. ID # 115293-E11607-24)

BIE conducted an investigation into a fraud ring that was active on the BetMGM Platform and the Borgata interactive wagering platform (“Borgata Platform”) from January 17, 2021, through November 26, 2024. The fraud ring, which was perpetrated by seven (7) primary suspects, created a total of 32 accounts on the BetMGM Platform and two (2) accounts on the Borgata Platform using the personal identifying information of other individuals. Of the BetMGM fraud ring accounts, 27 made deposits totaling \$1,841.27 and one (1) Borgata fraud ring account made deposits totaling \$50. The BetMGM fraud ring accounts were issued bonuses totaling \$2,047.73 in free casino play and one (1) Borgata fraud ring account was issued bonuses totaling \$75. The total amount wagered by the BetMGM fraud accounts was \$14,598.33, consisting of \$1,882.12 in casino wagers, \$12,530.09 in sports wagers, and \$186.12 in poker wagers. The total amount wagered by the BetMGM fraud account was \$1,890.44 in casino wagers. The total amount of winnings was \$299.85. A total of 10 accounts completed a total of 16 withdrawals totaling \$2,330.51. The 27 BetMGM fraud accounts that made deposits did so utilizing, or unsuccessfully attempting to use, a total of 92 different financial instruments. The Borgata fraud account that made deposits did so utilizing, or unsuccessfully attempting to use, a total of two (2) different financial instruments. Eleven (11) financial instruments were used by ten (10) accounts for

withdrawals totaling \$2,330.51. There are 11 BetMGM fraud accounts with a remaining balance totaling \$1,258.64 and the Borgata fraud account has a remaining balance of \$.60. Two (2) accounts had successful chargebacks totaling \$165, of which BetMGM recovered \$50 from a remaining account balance, however \$115 from the chargebacks and \$105 in chargeback fees remains owed.

This fraud ring was identified through a series of hallmarks commonly associated with fraudulent accounts created using the personal identifying information of other individuals for the purposes of bonus abuse and/or utilizing stolen or fraudulent payment devices. These accounts were linked through shared registration details such as phone numbers, financial instruments used for depositing and withdrawing funds, shared devices, shared IP addresses, and common geolocation activity.

Only six (6) of the accounts provided identifying documentation upon request, of which, one (1) of those responses appeared to be a clearly digitally altered “selfie” of the purported account creator holding a Pennsylvania identification card. Each of the accounts that provided identifying documentation have been identified as suspects in creating the remaining accounts using the personal identifying information of other individuals. Four (4) accounts had registered financial instruments with an input name on the financial instrument that did not match the name of the registered account. Thirteen (13) accounts completed 76 deposits from 17 financial instruments totaling \$1,591.27 in which there was no AVS match; six (6) of these financial instruments were also used for withdrawals totaling \$711.04. Eight (8) financial instruments were shared by 13 accounts.

At least three (3) locations, which were the common primary geolocation for the majority of the activity associated with 22 of the fraud accounts, are connected to one or more of the fraud

ring suspects. Of the 27 devices used in this fraud group, seven (7) were shared by a total of 27 accounts. Seven (7) IP addresses were associated with a majority of the activity associated with 27 of the fraud accounts.

Three (3) phone numbers were shared by 23 accounts. At least 29 email addresses associated with the fraud accounts have traits indicative of being connected to a suspect or as being unrelated to the purported account creator.

In response to this incident, BetMGM closed 32 associated accounts and the financial instruments and devices associated with the closed accounts have been blocked.

COUNT #3

(Inv. ID # 115293-E11020-24)

BIE conducted an investigation into a fraud ring that was active on the Borgata Platform from May 31, 2021, through November 16, 2023. The fraud ring, which was perpetrated by two (2) primary suspects, created a total of 119 accounts on the Borgata Platform using the personal identifying information of other individuals. Of these accounts, 59 made deposits totaling \$76,220.70. The Borgata fraud ring accounts issued bonuses totaling \$10,031.93. The total amount wagered by the Borgata fraud accounts was \$895,092.48. A total of 15 accounts completed withdrawals totaling \$59,895.60. The Borgata fraud accounts that made deposits did so utilizing, or unsuccessfully attempting to use, a total of 160 different financial instruments. There are four (4) fraud accounts with a remaining balance totaling \$563.99. Two (2) accounts had successful chargebacks totaling \$60, of which BetMGM recovered the full amounts from remaining account balances.

This fraud ring, which is also associated with the fraud ring identified in Count #8 (115293-E11019-24) as there are a total of 27 shared devices, one (1) shared geolocation and seven

(7) shared financial instruments, was identified through a series of hallmarks commonly associated with fraudulent accounts created using the personal identifying information of other individuals for the purposes of bonus abuse and/or utilizing stolen or fraudulent payment devices. These accounts were linked through shared registration details such as phone numbers, financial instruments used for depositing and withdrawing funds, shared devices, and common geolocation activity.

Only seven (7) of the accounts provided valid identifying documentation upon request. Nineteen (19) financial instruments were used among 48 accounts to complete deposits totaling \$5,627.56 in which there was no AVS match.

The common primary geolocation for most of the activity associated with the fraud accounts is the registered address of one (1) of the fraud ring suspects. Thirty-Nine (39) devices were used in this fraud group, three (3) of which were shared by a total of seven (7) accounts. Seven (7) devices accessed more than five (5) accounts. Two (2) devices accessed nine (9) accounts, one (1) device accessed eight (8) accounts, one (1) device accessed seven accounts, and three (3) devices accessed six (6) accounts. Four (4) phone numbers that were shared by eight (8) accounts.

In response to this incident, BetMGM closed all associated accounts and the devices associated with the closed accounts have been blocked.

COUNT #4

(Inv. ID # 115293-E11016-24)

BIE conducted an investigation into a fraud ring that was active on the BetMGM and Borgata Platforms from May 12, 2022, through December 12, 2023. The fraud ring, which was perpetrated by unknown suspects, created 2,700 BetMGM and Borgata accounts using the personal

identifying information of other individuals. These accounts were created, and of those with activity, were accessed in multiple states. Of these accounts, 21 accounts had game play and bonus funds issued, 1,563 accounts deposited funds totaling \$2,158,489.45, of which 6,321 financial instruments were utilized to complete the transactions. 1,249 accounts withdrew funds totaling \$1,541,782.84 and the total balance remaining on accounts is \$151,503.92. There were 718 financial instruments shared by the accounts. 615 financial instruments which were not in the name of the account holder were utilized to make successful deposits and withdrawals. 453 accounts had five (5) or more registered financial instruments, ranging from five (5) to 25.

Specifically, regarding Pennsylvania, a total of 304 BetMGM and Borgata accounts were created. These accounts completed 192 deposits totaling \$356,560.28. 161 withdrawals were completed totaling \$292,997.04. Of the accounts with withdrawals, \$81,571.25 was withdrawn by 154 accounts that conducted no gaming activity. Total amount wagered by the Pennsylvania fraud accounts was \$867,909.91, winning a total of \$8,241.41. An account balance was left on the Pennsylvania fraud accounts totaling \$46,285.74. These accounts were issued \$20,962.42 in free play.

The total number of financial instruments used to deposit on the Pennsylvania fraud accounts was 784. The total number of financial instruments used to withdraw on the Pennsylvania fraud accounts was 168. Of the financial instruments used, 113 had no AVS match and 7 had a partial AVS match. 121 of the financial instruments were used by more than one account. A total of 41 devices were used to access more than one of the Pennsylvania Fraud Accounts. 49 IP Addresses were shared by 236 of the Pennsylvania Fraud Accounts. Twelve (12) of the accounts shared the same phone number. Two (2) of the accounts were created using the personal identifying information of a deceased individual. None of the Pennsylvania Fraud Accounts provided

identifying document upon request. 44 chargebacks were associated with the Pennsylvania Fraud Accounts, totaling \$29,252.00.

In response to this incident, BetMGM closed all associated accounts and devices associated with the closed accounts have been blocked.

CONCLUSION

BetMGM failed to have sufficient procedures to prevent fraudulent behavior on the BetMGM and Borgata iGaming Platforms at the time of the incidents described herein. Insufficient Know-Your-Customer (“KYC”) protocols resulted in violations of the sections of the Act and regulations promulgated thereunder as described above. Specifically, BetMGM’s insufficient protocols and systemic failure to implement and utilize available KYC and fraud prevention tools and tactics allowed for the creation, access and use of multiple accounts by individuals, the creation of accounts using the personal identifying information of other individuals, the funding of accounts using stolen or fraudulently obtained payment devices, and the withdrawing of funds into accounts controlled by individuals conducting fraudulent behavior.

In consideration of the remedial measures taken by BetMGM, an additional five (5) counts of KYC related violations have been made part of a compliance conference to review and discuss BetMGM’s implementation of the corrective and remedial measures outlined below.

REMEDIAL MEASURES

Please see attached Exhibit A, marked CONFIDENTIAL, for a detailed discussion of BetMGM remedial measures. Contemporaneously with the execution and delivery of this Consent Agreement, BetMGM has filed with the Board a Motion to Protect Confidential Information relating to the information disclosed in Exhibit A.

HISTORY

This is the first consent agreement of this nature between OEC and BetMGM since BetMGM's Sports Wagering Operator License and Interactive Gaming Operator License was approved by the Board in October 2020. Additionally, no compliance conferences have been conducted and no warning letters have been issued to BetMGM regarding an incident of this nature since BetMGM's Sports Wagering Operator License and Interactive Gaming Operator License was approved by the Board in October 2020.

TERMS OF AGREEMENT

In consideration of the foregoing stipulated facts, and in full and final settlement of any and all claims, causes or actions which could or might be brought under the Act or the regulations promulgated thereunder, whether against BetMGM, LLC, or any of its owners, employees or agents, arising out of the matters identified in the above stipulated facts, the Parties do hereby further stipulate and agree that:

1. This Consent Agreement shall become final and effective only upon its approval by the Board; and
2. BetMGM, LLC shall pay to the Board a civil penalty in the amount of one hundred thousand (\$100,000) dollars within five days of the Board's Order approving this consent agreement; and
3. BetMGM, LLC shall pay to the Board two thousand five hundred dollars (\$2,500.00) for the costs incurred by OEC, BIE and other related staff in connection with this matter within five days of the Board's Order approving this consent agreement;
4. BetMGM, LLC shall pay the civil penalty and associated fees via wire transfer or check and shall indicate via note on the payment instrument "BetMGM-OEC Consent

Agreement (Inv. ID #115293-E11024-24)” and upon payment email the wire transfer confirmation number or check number to John Crohe at jcrohe@pa.gov; and

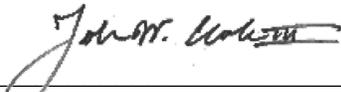
5. BetMGM, LLC shall immediately institute policies and procedures to prevent similar incidents from occurring in the future; and
6. If approved, the Board may make information public with respect to the terms and conditions of this Consent Agreement; and
7. This Consent Agreement may be set aside by the Board if any term herein is violated by BetMGM, LLC; and
8. BetMGM, LLC, through its authorized representatives whose signatures appear below, have read and fully understand the terms of this Consent Agreement.

This Consent Agreement is offered and, if approved by the Board, entered for settlement purposes only. If the Board determines not to approve the effectiveness of same, then this Consent Agreement and the representations and obligations contained herein shall be null and void, and neither Party nor any other person shall be entitled to use or rely on any portion hereof for any purpose whatsoever or to admit any portion hereof into evidence in the captioned matter or any subsequent proceeding.

This Consent Agreement shall not preclude the Board, BIE or OEC from reviewing and considering any facts in any future proceeding relating to any application for licensure or qualification of the licensee. BetMGM, LLC expressly acknowledges and agrees that the Board reserves the right to take any actions that the Board, in its sole discretion, believes is necessary to protect the integrity of gaming in Pennsylvania, including the right to suspend or revoke any license, approval or permit without limitation if any further violations occur or are subsequently discovered, all in accordance with the Act and the regulations promulgated thereunder.

The undersigned consent to the form and entry of the above.

**Pennsylvania Gaming Control Board
Office of Enforcement Counsel**



By: John Crohe
Senior Enforcement Counsel

DATED: 12/30/2025

BetMGM, LLC



By: Rhea Loney
Chief Compliance Officer

DATED: 12/30/2025