

MISSOURI GAMING COMMISSION

COMMISSION RESOLUTION NO. 25-056
REGARDING APPROVAL OF FINAL ORDERS OF RULEMAKING

May 13, 2025

WHEREAS, on February 18, 2025, the Commission approved the proposed amendments listed on Exhibit A;

WHEREAS, a public hearing to receive comments on these proposed amendments was held on April 17, 2025, at the Commission's offices. Comments were received at the public hearing as well as during the public comment period regarding the above-referenced amendments;

BE IT RESOLVED, that the Missouri Gaming Commission approves the Final Orders of Rulemaking for the rule listed in Exhibit A.

SO ADOPTED.


Jan Zimmerman
Chairman
Missouri Gaming Commission

EXHIBIT A

Final Orders of Rulemaking

1. 11 CSR 45-20.020 Sports Wagering Licenses
2. 11 CSR 45-20.030 Confidentiality of Records
3. 11 CSR 45-20.040 License Application
4. 11 CSR 45-20.050 Direct Mobile License Competitive Application Process
5. 11 CSR 45-20.060 Suitability for Licensure
6. 11 CSR 45-20.070 License Issuance
7. 11 CSR 45-20.080 License Renewal
8. 11 CSR 45-20.090 License Fees, Application Fees, and License Renewal Fees
9. 11 CSR 45-20.100 Duties of Licensees
10. 11 CSR 45-20.110 Prohibition and Reporting of Certain Transactions
11. 11 CSR 45-20.120 SW Occupational License Badge
12. 11 CSR 45-20.130 Casino Access Badge Requirements for Retail Locations
on Excursion Gambling Boats

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TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.020 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 421–423). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule. Commission staff made four (4) comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.020 – Craig Williams, a member of the general public, suggested that the word “official” be removed throughout this proposed rule. He stated licensees should be allowed under these regulations to acquire data independently of the official league data provider. He suggested adding a paragraph that would require either the data provider or the licensee to demonstrate before the commission the viability of the independent data source and management. He goes on to say the independent data source should be able to meet the same performance standards as the official data.

RESPONSE: Article III, Section 39(g) of the *Missouri Constitution* provides for a sports governing body to notify the commission of its intent to supply official league data. If the sports governing body notifies the commission of its intent to supply official league data, then the sports wagering operators must use its data for all tier two wagers. If the sports governing body does not notify the commission of its intent to use official league data then the sports wagering operators may use any licensed supplier of data. No changes have been made to the rule as a result of this comment.

COMMENT #2: 11 CSR 45-20.020(5)(F) – Staff suggested removal of this subsection, which states, “Is directed by the commission to obtain an SW Supplier license,” as it is not clear which job positions this would include.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to remove this subsection.

COMMENT #3: 11 CSR 45-20.020(10)(L) – Staff suggested this subsection be revised to qualify who might be required to obtain an Occupational Level I-SW or Level I-SWC license.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Any other person in a similar or equivalent position as directed by the commission.”

COMMENT #4: 11 CSR 45-20.020(11)(B) – Cory Fox, with FanDuel, recommended removing this subsection in its entirety. Alternatively, he recommended the commission align this requirement with the requirements in section (10) by including the qualifier that such individual be the “highest ranking” employee at that respective position.

RESPONSE: The commission believes these individuals need to be licensed to ensure the integrity of sports wagering in Missouri. The alternative language suggested is unclear in that it does not specifically address job positions but instead lists individual duties which may apply to multiple job positions. No changes have been made to the rule as a result of this comment.

COMMENT #5: 11 CSR 45-20.020(15) – Staff suggested this subsection be revised to clarify which sports wagering related duties that a Retail licensee may contract with a Class B licensee to provide on its behalf.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to add, “The only sports wagering duties that can be contracted are duties related to security, surveillance, environmental services, and facilities.”

COMMENT #6: 11 CSR 45-20.020(20) – Staff suggested to remove “revoke” and “suspend” from this section and replace with “discipline” to address all forms of discipline for various licenses. The types of discipline pertaining to each type of license is addressed in 11 CSR 45-20.150.

RESPONSE AND EXPLANATION OF CHANGE: Agreed. Revised this section to state, “The commission may issue, deny, or discipline any license. Licensees and applicants may request a hearing pursuant to 11 CSR 45-13 regarding the commission’s decision to deny or discipline a license.”

11 CSR 45-20.020 Sports Wagering Licenses

(5) An SW Supplier license shall be required for any individual or entity that—

(A) Manufactures, sells, or leases sports wagering equipment, sports wagering systems, or other gaming items necessary to conduct sports wagering;

(B) Provides sports wagering equipment maintenance or repair;

(C) Provides independent testing laboratory services on sports wagering equipment or sports wagering systems;

(D) Provides gaming-related services or software for player geolocation identification, integrity monitoring, odds and risk management, managed trading services, an online sports wagering platform, or player account management; or

(E) Provides other categories of gaming-related goods, data, or services to a Retail or Mobile licensee if the commission determines that the goods, data, or services impact the integrity or security of the sports wagering operation.

(10) At a minimum, an Occupational Level I-SW or Occupational Level I-SWC license is required for the following job positions:

(A) Highest ranking on premises sportsbook department employee (for Retail licensees);

(B) Highest ranking employee(s) with direct authority over information technology, network security, and cybersecurity (for Retail and Mobile licensees);

(C) Highest ranking employee responsible for the operation and security of the sports wagering platform (for Retail and Mobile licensees);

(D) Highest ranking finance department employee (for Retail and Mobile licensees);

- (E) Highest ranking on premises surveillance department employee (for Retail licensees);
- (F) Highest ranking on premises security department employee (for Retail licensees);
- (G) Highest ranking manager of an Official League Data Provider (for Official League Data Provider licensees);
- (H) Managers responsible for ensuring the integrity of all testing standards and certifications (for independent testing laboratory SW Supplier licensees);
- (I) Highest ranking employee with direct authority over the setting of betting lines, point spreads, odds, or their equivalent (for Retail and Mobile licensees);
- (J) Highest ranking employee responsible for compliance regarding responsible gaming, geofencing, and anti-money laundering (for Mobile licensees);
- (K) General Managers of a Class B licensee, if the Class B licensee holds a Retail or Mobile license or if any Class B employees perform duties related to sports wagering for the licensed sports wagering operator; and
- (L) Any other person in a similar or equivalent position as directed by the commission.

(15) Retail licensees operating on behalf of a Class B licensee may contract with the Class B licensee to use the Class B licensee's employees to perform duties related to sports wagering; however, those employees shall obtain an Occupational Level I-SWC or Level II-SWC license prior to performing any sports wagering duties. The only sports wagering duties that can be contracted are duties related to security, surveillance, environmental services, and facilities.

(20) The commission may issue, deny, or discipline any license. Licensees and applicants may request a hearing pursuant to 11 CSR 45-13 regarding the commission's decision to deny or discipline a license.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.030 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 423–424). Those sections with changes are re-printed here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. Commission staff made two (2) comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.030(2)(B) – Staff suggested revising “An identification” to “The identity” for grammatical clarity.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “The identity of the applicant, licensee, or key person including, if the applicant, licensee, or key person is not an individual, the state of incorporation or registration, and the corporate officers.”

COMMENT #2: 11 CSR 45-20.030(3) – Staff suggested revising the language because a rule cannot supplant a statute and to clarify the authority of the commission to collect tax information.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “The Department of Revenue may furnish and the commission may receive tax information pursuant to section 610.032, RSMo, to determine if applicants or licensees are complying with the tax laws of this state; however, any tax information acquired by the commission shall not become public record and shall be used exclusively for commission business.”

11 CSR 45-20.030 Confidentiality of Records

(2) The commission shall, upon written request from any person, provide such person with the following information furnished by an applicant, licensee, or key person:

(A) The name, business address, and business telephone number of the applicant, licensee, or key person;

(B) The identity of the applicant, licensee, or key person including, if the applicant, licensee, or key person is not an individual, the state of incorporation or registration, and the corporate officers;

(C) Whether the applicant, licensee, or key person has been indicted, convicted of, pleaded guilty or *nolo contendere* to, or forfeited bail for any criminal offense under the laws of any jurisdiction, either felony or misdemeanor, except for traffic violations, including the date, the name and location of the court, the arresting agency and prosecuting agency, the case number, the offense, the disposition, and the location and length of incarceration;

(D) Whether the applicant, licensee, or key person has had any license or certificate issued by a licensing authority in this state or any jurisdiction denied, restricted, suspended, revoked, or not renewed and a statement describing the facts and circumstances concerning the denial, restriction, suspension, revocation, or nonrenewal, including the licensing authority, the date each such action was taken, and the reason for each such action;

(E) The name and business telephone number of the counsel representing the applicant, licensee, or key person in matters before the commission; and

(F) A description of the product or service to be supplied by an SW Supplier applicant or licensee.

(3) The Department of Revenue may furnish and the commission may receive tax information pursuant to section 610.032, RSMo, to determine if applicants or licensees are complying with the tax laws of this state; however, any tax information acquired by the commission shall not become public record and shall be used exclusively for commission business.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.040 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 424–427). Those sections with changes are re-printed here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. Commission staff made nine (9) comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.040(1)(A)-(G) – A staff member noted that since changes are being made to the text of the Retail and Mobile License Application, SW Supplier and Official League Data Provider License Application, Occupational Level I-SW License Application, Occupational Level-I SWC License Application, Occupational Level II-SW License Application, Occupational Level II-SWC License Application, and SW Personal Disclosure Form, the date of incorporation by reference needs to be revised to reflect the date the commission adopted the revised material.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the date of adoption accordingly.

COMMENT #2: 11 CSR 45-20.040(7) – Staff suggested to add “that require a license” to clarify which types of duties cannot be performed until the appropriate license has been obtained.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Every person upon being assigned to a position that requires an Occupational Level I-SW or an Occupational Level I-SWC license shall file the appropriate application within sixty (60) days. No duties that require a license shall be performed by that person until the appropriate license has been obtained.”

COMMENT#3: 11 CSR 45-20.040(9) – Cory Fox, with FanDuel, recommended that the commission clarify that interviews, if requested, will only be required for Occupational Level I SW or SWC applicants and not for Occupational Level II SW or SWC applicants.

RESPONSE: The commission routinely interviews both Occupational Level I and Level II applicants for casino occupational licensees and will do the same for SW occupational licensees as part of the licensing process. No changes have been made to the rule as a result of this comment.

COMMENT #4: 11 CSR 45-20.040(9) – Staff suggested to add “relevant to the application” at the end of the section to qualify the type of information which may be requested.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “In addition to submitting an application, each applicant for an SW Occupational license is required to be photographed or provide a photograph, be interviewed if requested, and provide any documentation requested by the commission relevant to the application.”

COMMENT #5: 11 CSR 45-20.040(13) – Staff suggested to add “during the application period” to the first sentence to clarify that this only applies during the application period.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the first sentence to state, “The applicant shall be responsible for keeping the application current at all times during the application period.”

COMMENT #6: 11 CSR 45-20.040(14) – Staff suggested to add a minimum time frame of five (5) days for the licensee to respond to the notice.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “The commission may serve any applicant and his or her employer with written notice by personal delivery, electronic mail, or regular mail, requiring the applicant to complete all or any specific portion of the application process or provide additional information, on or before the date set forth in the notice, which shall not be less than five (5) business days from the date of the notice. If the applicant fails to comply with the notice, the commission may consider the application withdrawn and the application process closed.”

COMMENT #7: 11 CSR 45-20.040(16) – Staff suggested to replace “executive director” with “commission” as the constitution gives this authority to the commission. Additionally, staff suggested removing the last sentence, which states, “Should the executive director revoke a temporary license and seek denial of licensure by the commission, this action shall be reported to the commission and the applicant,” as this would no longer apply given the prior change. Staff also suggested to add “for a violation” to the end of the second sentence to clarify that the revocation would be due to a violation.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and replaced “executive director” with “commission.” Added “for a violation” to the end of the second sentence. Removed the last sentence.

COMMENT #8: 11 CSR 45-20.040(17) – Staff suggested to replace “executive director” with “commission” as the constitution gives this authority to the commission. Additionally, staff suggested removing the last sentence, which states, “Should the executive director revoke a temporary license and seek denial of licensure by the commission, this action shall be reported to the commission and the applicant,” as this would no longer apply given the prior change. Staff also suggested to add “for a violation” to the end of the second sentence to clarify that the revocation would be due to a violation.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and replaced “executive director” with “commission.” Added “for a violation” to the end of the second sentence. Removed the second to last sentence.

COMMENT #9: 11 CSR 45-20.040(18) – Staff suggested to replace “executive director” with “commission” as the constitution gives this authority to the commission. Additionally, staff suggested revising the last sentence to remove notification of the commission. Staff also suggested to add “for a violation” to the end of the second sentence to clarify that the revocation would be due to a violation.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and replaced “executive director” with “commission.” Added “for a violation” to the end of the second sentence. Revised the last sentence to state, “Should the commission revoke or suspend a temporary license and seek denial of licensure, this action shall be reported to the licensee who employed the applicant and the applicant.”

COMMENT #10: Private Cost – Staff determined that the original number of entities that was estimated to hold a Mobile license was overstated.

RESPONSE AND EXPLANATION OF CHANGE: “13 casinos” was changed to “6 Class A licensees;” therefore, the total number of estimated Mobile licensees was reduced from twenty-one (21) to fourteen (14). This reduced the estimated cost from one hundred eighty-nine thousand dollars (\$189,000.00) to one hundred twenty-six thousand dollars (\$126,000.00) for Mobile licensees. This changed the total estimated cost from three hundred eighty-two thousand dollars (\$382,000.00) to three hundred nineteen thousand dollars (\$319,000.00).

11 CSR 45-20.040 License Application

(1) The following forms are incorporated by reference and made part of this rule as adopted by the commission and published by the Missouri Gaming Commission, 3417 Knipp Dr., PO Box 1847, Jefferson City, MO 65102, and which may be accessed at <http://www.mgc.dps.mo.gov>:

(A) Retail and Mobile License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(B) SW Supplier and Official League Data Provider License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(C) Occupational Level I-SW License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(D) Occupational Level I-SWC License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(E) Occupational Level II-SW License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(F) Occupational Level II-SWC License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions; and

(G) SW Personal Disclosure Form as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions.

(7) Every person upon being assigned to a position that requires an Occupational Level I-SW or an Occupational Level I-SWC license shall file the appropriate application within sixty (60) days. No duties that require a license shall be performed by that person until the appropriate license has been obtained.

(9) In addition to submitting an application, each applicant for an SW Occupational license is required to be photographed or provide a photograph, be interviewed if requested, and provide any documentation requested by the commission relevant to the application.

(13) The applicant shall be responsible for keeping the application current at all times during the application period. The applicant shall notify the commission in writing within ten (10) calendar days of any material changes to any response in the application and this responsibility shall continue throughout any period during which an application is being considered by the commission. All updates to applications shall be submitted by exhibit so that each affected exhibit is resubmitted with the updated information and with the date of resubmission. If any application update is not made in this manner, the commission may deem the update not to be effective.

(14) The commission may serve any applicant and his or her employer with written notice by personal delivery, electronic mail, or regular mail, requiring the applicant to complete all or any specific portion of the application process or provide additional information, on or before the date set forth in the notice, which shall not be less than five (5) business days from the date of the notice. If the applicant fails to comply with the notice, the commission may consider the application withdrawn and the application process closed.

(16) A temporary Retail or Mobile license may be issued to an applicant pending a determination on the application for licensure. The commission may revoke a temporary license at any time for a violation. If an applicant's temporary license is revoked, the applicant shall immediately cease any sports wagering operations in the state of Missouri.

(17) The commission may issue to the applicant for an SW Supplier license or Official League Data Provider license a temporary license during the time the application is pending with the commission. The commission may revoke a temporary license at any time for a violation. If an applicant's temporary license is revoked, the applicant shall not provide any Retail or Mobile licensee any equipment, supplies, or services that would otherwise require a license. The commission shall also notify all Retail or Mobile licensees of the revocation of the applicant's temporary license.

(18) The commission may issue to the applicant for an SW Occupational license a temporary license, allowing the individual to perform his or her duties during the time the application is pending with the commission. The commission may revoke or suspend a temporary license at any time for a violation. If the temporary license is revoked or suspended, the individual shall immediately cease performing any duties for the licensed entity that would otherwise require an SW Occupational license. Should the commission revoke or suspend a temporary license and seek denial of licensure, this action shall be reported to the licensee who employed the applicant and the applicant.

REVISED PRIVATE COST: The cost to private entities is an estimated three hundred nineteen thousand dollars (\$319,000.00) versus the estimated three hundred eighty-two thousand dollars (\$382,000.00), which was submitted in the original estimate.

**FISCAL NOTE
PRIVATE COST**

**I. Department Title: 11 – Department of Public Safety
Division Title: 45 – Missouri Gaming Commission
Chapter Title: 20 – Sports Wagering**

Rule Number and Title:	11 CSR 45-20.040 License Application
Type of Rulemaking:	Final order of rulemaking for a proposed rule with changes

II. SUMMARY OF FISCAL IMPACT

Estimate of the number of entities by class which would likely be affected by the adoption of the rule:	Classification by types of the business entities which would likely be affected:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
15	Retail Sports Wagering Operators	\$148,000.00
14	Mobile Sports Wagering Operators	\$126,000.00
18	Sports Wagering Suppliers	\$42,000.00
1	Official League Data Providers (OLDPs)	\$3,000.00

III. WORKSHEET

Retail (15 applicants X 40 hours X \$50 per hour)	\$30,000.00
Level I [(7 Level I's for 15 Retail licensees + 13 general managers) X 20 hours X \$50 per hour]	\$118,000.00
Total	\$148,000.00
Mobile [(6 Class A licensees + 6 sports districts + 2 direct) X 40 hours X \$50 per hour]	\$28,000.00
Level I (7 Level I's for each of the 14 mobile licenses X 20 hours X \$50 per hour)	\$98,000.00
Total	\$126,000.00
Supplier (18 applicants X 40 hours X \$50 per hour)	\$36,000.00
Level I (6 Level Is X 20 hours X \$50 per hour)	\$6,000.00
Total	\$42,000.00

OLDP (1 applicant X 40 hours X \$50 per hour)	\$2,000.00
Level I (1 Level I X 20 hours X \$50 per hour)	\$1,000.00
Total	\$3,000.00
GRAND TOTAL	\$319,000.00

IV. ASSUMPTIONS

Retail Sports Wagering Operators – 15 (13 casinos and 2 sports teams)

Mobile Sports Wagering Operators – 14 (6 Class A licensees, 6 sports teams, and 2 direct)

Sports Wagering Suppliers – 18

Official League Data Providers – 1

40 hours to complete an application for a Retail, Mobile, Supplier, or OLDP license

20 hours to complete an application for a Level I license

Average cost per hour to complete an application is \$50.00

Level I's – 272 new Level I applicants

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.050 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 428). Those sections with changes are re-printed here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule.

COMMENT #1: 11 CSR 45-20.050 – Cory Fox, with FanDuel, recommended adding a new section (7) which states, “After the applicable investigation and receipt of payment for the applicant license fee, the commission shall concurrently issue the available direct Mobile license(s) to such applicant(s).”

RESPONSE: The recommended language only addresses the initial issuance of the two (2) direct Mobile licenses and does not give consideration for future instances where only one (1) license may need to be issued. The commission will notify the selected two (2) top qualified candidates concurrently without requiring an additional rule. Additionally, the direct mobile applicants that are selected will not receive their license before other applicants for Retail and Mobile licenses. No changes have been made to the rule as a result of this comment.

COMMENT #2: 11 CSR 45-20.050(2) – Staff suggested to revise to state, “After December 1, 2025, the application period shall not be less than sixty (60) days.”

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “After December 1, 2025, the application period shall not be less than sixty (60) days.”

COMMENT #3: 11 CSR 45-20.050(4)(E) – Craig Williams, a member of the general public, suggested that the commission reconsider the use of the word “maximize” in this standard. He noted that it appears to be a conflict of interest in a state prioritizing maximizing licensees’ revenue at the cost of patrons. He stated that ideally a commission should sit squarely between the patron and licensee as a neutral facilitator and guardian of fair play. He stated if patrons in Missouri outperform those in other jurisdictions at the cost of lower tax revenue, that may even be a welcome surprise. He went on to say if maximizing tax revenue has been the previous paradigm, the MGC

has the opportunity to become the first to flip the paradigm toward protection and fair play for the patron.

RESPONSE: The term “maximize” is copied verbatim from Article III, Section 39(g) of the *Missouri Constitution*. The constitution requires the commission to consider an applicant’s ability to maximize state revenues when selecting the two (2) direct mobile licensees. No changes have been made to the rule as a result of this comment.

11 CSR 45-20.050 Direct Mobile License Competitive Application Process

(2) When a direct Mobile license is available, the commission will post a notice on the commission’s website that the commission is accepting applications for a direct Mobile license and include the application period for such license. After December 1, 2025, the application period shall be not less than sixty (60) days.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.060 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 428–429). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. Commission staff made four (4) comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.060(3)(A)(1) – Staff suggested to revise to replace, “extensive police records” with “law enforcement records involving crimes of moral turpitude” for clarity and to remove subjective language.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Of notorious or unsavory reputation or who has law enforcement records involving crimes of moral turpitude”

COMMENT #2: 11 CSR 45-20.060(4)(H) – Staff suggested to revise to replace, “Who is an illegal alien” with “Who is not lawfully in the United States” for clarity.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Who is not lawfully in the United States.”

COMMENT #3: 11 CSR 45-20.060(4)(K) – Staff suggested to revise to replace, “an extensive police record” with “a law enforcement record involving crimes of moral turpitude” for clarity and to remove subjective language.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Who is not of good moral character or has associated in business affairs with or employed a person of notorious or unsavory reputation or who has a law enforcement record involving crimes of moral turpitude, or who has failed to cooperate with any officially constituted investigatory or administrative body.”

COMMENT #4: 11 CSR 45-20.060(4)(R) – Staff suggested to remove this subsection, which states, “Who pleaded guilty to or was convicted of any offense that would prohibit any licensee from employing the applicant pursuant to the terms of Chapter 313, RSMo,” as it is duplicative of subsection (4)(A).

RESPONSE AND EXPLANATION OF CHANGE: Agreed and removed subsection (4)(R) from this rule.

11 CSR 45-20.060 Suitability for Licensure

(3) The commission may deny or refuse to renew a license or revoke or suspend a license if the applicant or licensee, or a key person of the applicant or licensee—

(A) Associates in business affairs with or employs a person—

1. Of notorious or unsavory reputation or who has law enforcement records involving crimes of moral turpitude; or

2. Who has failed to cooperate with any officially constituted investigatory or administrative body, including but not limited to the commission;

(B) Has been convicted of a crime involving dishonesty or moral turpitude;

(C) Has submitted an application for a license, or any other documentation, to the commission that contains false information or has failed to disclose required information;

(D) Has had a sports wagering or gaming-related license revoked, suspended, or denied in Missouri or any other jurisdiction, or is an affiliate of a person who has had a sports wagering or gaming-related license revoked, suspended, or denied in any other jurisdiction;

(E) Has a background, including a criminal record, reputation, habits, business associations, or prior activities that—

1. Poses a threat to the public interests of the state of Missouri or to the security and integrity of sports wagering;

2. Poses a threat to public health, safety, morals, good order, and general welfare of the people of the state of Missouri; or

3. Discredits or tends to discredit the Missouri sports wagering industry or the state of Missouri;

(F) Creates or enhances the dangers of unsuitable, unfair, or illegal practices, methods, and activities in the conduct of sports wagering; or

(G) Presents questionable business practices and financial arrangements relating to the conduct of sports wagering.

(4) The commission may refuse to issue or renew an SW Occupational license to any person or revoke or suspend an SW Occupational license of any person who has failed to prove his or her suitability for licensure, including but not limited to any applicant or licensee —

(A) Who has been convicted of a crime or has been found guilty of, pleaded guilty or *nolo contendere* to, or entered an Alford plea to a crime, or received a suspended imposition of sentence, for violations of any federal, state, county, or city law including ordinance violations;

(B) Who is unqualified to perform the duties required;

(C) Who fails to disclose or states falsely information called for in the application process or uses fraud, deception, misrepresentation, or bribery in securing a license issued by the commission;

(D) Who has failed to comply with or make provision for complying with any federal, state, or local law or regulation, or internal controls of the licensed entity;

(E) Who fails to comply with any rule, order, or ruling of the commission;

(F) Whose license has been suspended, revoked, or denied in any jurisdiction;

(G) Who is a past or present member or participant in organized crime as such membership or participation may be found or determined by the commission;

- (H) Who is not lawfully in the United States;
- (I) Who is an employee of the commission or is a spouse, child, brother, sister, parent, son-in-law, daughter-in-law, stepchild, or stepparent of any employee or member of the commission;
- (J) Who demonstrates a pattern of being financially irresponsible;
- (K) Who is not of good moral character or has associated in business affairs with or employed a person of notorious or unsavory reputation or who has a law enforcement record involving crimes of moral turpitude, or who has failed to cooperate with any officially constituted investigatory or administrative body;
- (L) Who would adversely affect public confidence and trust in gambling;
- (M) Who provides the commission with false or misleading information, documents, or data or who makes false or misleading statements to the commission;
- (N) Who fails to cooperate with any licensing or regulatory investigation;
- (O) Who commits an act or omission that, if committed by any licensee, would be grounds for discipline or denial of an application;
- (P) Who obtains or attempts to obtain any fee, charge, or other compensation by fraud, deception, or misrepresentation; or
- (Q) Who demonstrates incompetence, misconduct, gross negligence, fraud, misrepresentation, or dishonesty in the performance of the functions or duties regulated by Article III, Section 39(g) of the *Missouri Constitution* or Chapter 313, RSMo.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.070 License Issuance is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 429–430). No changes have been made to the text of the proposed rule, so it is not reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. Commission staff made no comments on the proposed rule.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.080 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 430–431). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. Commission staff made five (5) comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.080(1)(A)-(E) – A staff member noted that since changes are being made to the text of the Retail and Mobile License Application, SW Supplier and Official League Data Provider License Application, Occupational Level I-SW License Application, Occupational Level-I SWC License Application, and SW Personal Disclosure Form, the date of incorporation by reference needs to be revised to reflect the date the commission adopted the revised material.
RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the date of adoption accordingly.

COMMENT #2: 11 CSR 45-20.080(5) and (6) – Staff suggested to add “updating all required information for the prior two (2) years” to the end of the sentence for clarity.
RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to add “updating all required information for the prior two (2) years” to the end of the sentence.

COMMENT #3: 11 CSR 45-20.080(8)(A) – Staff suggested to revise the current language for clarity to state “Each licensee shall indicate, on a report provided by the commission, each SW Occupational licensee to be renewed.”
RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Each licensee shall indicate, on a report provided by the commission, each SW Occupational licensee to be renewed.”

COMMENT #4: 11 CSR 45-20.080(11) – Staff suggested to remove this section, which states, “The executive director shall have the authority to renew any SW Occupational license, provided that if the executive director intends not to renew an Occupational Level I-SW or Level I-SWC license, which the licensee has appropriately requested to be renewed, the executive director shall notify the commission in writing of his or her intention not to renew and the reasons for his or her decision at least ten (10) calendar days before the license expires,” because only the commission has the authority to renew licensees.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and removed this section.

COMMENT #5: 11 CSR 45-20.080(12) – Staff suggested to revise the second sentence to clarify that the commission will provide notice “to the licensee.”

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the second sentence to state, “The commission shall provide notice to the licensee at least one hundred and fifty (150) days prior to the due date of the renewal application.” With the removal of section (11), section (12) was renumbered to (11).

11 CSR 45-20.080 License Renewal

(1) The following forms are incorporated by reference and made part of this rule as adopted by the commission and published by the Missouri Gaming Commission, 3417 Knipp Dr., PO Box 1847, Jefferson City, MO 65102, and which may be accessed at <http://www.mgc.dps.mo.gov>:

(A) Retail and Mobile License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(B) SW Supplier and Official League Data Provider License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(C) Occupational Level I-SW License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions;

(D) Occupational Level I-SWC License Application as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions; and

(E) SW Personal Disclosure Form as adopted by the commission on May 13, 2025. This rule does not incorporate any subsequent amendments or additions.

(5) Each Occupational Level I-SW licensee shall file for license renewal at least ninety (90) calendar days before his or her license expires by submitting to the commission a completed Occupational Level I-SW License Application updating all required information for the prior two (2) years.

(6) Each Occupational Level I-SWC licensee shall file for license renewal at least ninety (90) calendar days before his or her license expires by submitting to the commission a completed Occupational Level I-SWC License Application updating all required information for the prior two (2) years.

(8) Each Retail, Mobile, SW Supplier, Official League Data Provider, and Class B licensee shall file a report with the commission on or prior to the fifteenth day of each calendar month identifying all of the personnel associated with that licensee who, as of the first day of the following month, hold positions requiring an SW Occupational license issued by the commission and whose expiration date(s) for such license occurs within the following calendar month.

(A) Each licensee shall indicate, on a report provided by the commission, each SW Occupational licensee to be renewed.

(B) Each Occupational Level II-SW and Occupational Level II-SWC licensee is required to obtain his or her renewed license by the tenth day of the renewal month.

(11) The commission may adjust renewal dates of licenses to economize commission resources. Any such adjustments shall result in a pro rata adjustment of fees. The commission shall provide notice to the licensee at least one hundred fifty (150) days prior to the due date of the renewal application.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.090 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 431–434). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule. Commission staff made two (2) comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.090 – Craig Williams, a member of the general public, suggested that the commission should consider offering a lower fee, such as fifty thousand dollars (\$50,000), for operating sports wagering for less established applicants with parameters such as having to pay the full fee if they reach an annual gross gaming revenue threshold.

RESPONSE: The commission believes that a standard license fee is appropriate based on the fact that it affords each licensee the same opportunity to offer sports wagering in the state regardless of the size of the entity. In addition, the sports teams and the excursion gambling boats will determine who they partner with if they do not obtain the licenses themselves. Therefore, the license fee would not be a determining factor in who gets a license. The direct mobile licenses must be awarded based on criteria outlined in the constitution. No changes have been made to the rule as a result of this comment.

COMMENT #2: 11 CSR 45-20.090 – David Jackson, with Sportradar Solutions, LLC, recommended the commission adopt a flat, fixed annual fee for Official League Data Provider licensees consistent with other supplier categories to ensure parity, fairness, and economic competitiveness.

RESPONSE: Article III, Section 39(g) of the *Missouri Constitution* provides for a sports governing body or its designee to be the official league data provider. Any entity that provides sports wagering data is required to obtain a supplier’s license; however, if the sports governing body requests to be the single source of data, then the sports governing body or its designee should have to pay a higher fee. The fee structure the commission used for Official League Data Provider license was modeled off the one used in the Illinois Sports Wagering Act. The commission did; however, reduce the license fee amounts which are required in Illinois for each level of data sales. No changes have been made to the rule as a result of this comment.

COMMENT #3: 11 CSR 45-20.090(12) – Staff suggested to replace “executive director” with “commission.” Additionally, add “for good cause” for clarity.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “The commission may waive or modify the licensing fees for good cause, except for Retail or Mobile licenses.”

COMMENT #4: Private Cost – Staff determined that the original number of entities that was estimated to hold a Mobile license was overstated. Additionally, staff received information that Mobile licensees will have more Occupational Level II-SW licensees than previously anticipated.

RESPONSE AND EXPLANATION OF CHANGE: “13 casinos” was changed to “6 Class A licensees;” therefore, the total number of estimated Mobile licensees was reduced from twenty-one (21) to fourteen (14). The number of Level II licensees for each Mobile licensee was increased from fifteen (15) to one hundred fifty (150). The estimated cost increased from three hundred eighty-five thousand eight hundred seventy-five dollars (\$385,875.00) to five hundred eighty-eight thousand dollars (\$588,000.00) for Mobile licensees. This changed the total estimated cost from \$1,334,775.00 to \$1,536,900.00.

11 CSR 45-20.090 License Fees, Application Fees, and License Renewal Fees

(12) The commission may waive or modify licensing fees for good cause, except for Retail or Mobile licenses.

REVISED PRIVATE COST: The cost to private entities is an estimated \$1,536,900.00 versus the estimated \$1,334,775.00, which was submitted in the original estimate.

FISCAL NOTE PRIVATE COST

**I. Department Title: 11 – Department of Public Safety
Division Title: 45 – Missouri Gaming Commission
Chapter Title: 20 – Sports Wagering**

Rule Number and Title:	11 CSR 45-20.090 License Fees, Application Fees, and License Renewal Fees
Type of Rulemaking:	Final order of rulemaking for a proposed rule with changes

II. SUMMARY OF FISCAL IMPACT

Estimate of the number of entities by class which would likely be affected by the adoption of the rule:	Classification by types of the business entities which would likely be affected:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
15	Retail Sports Wagering Operators	\$286,150.00
14	Mobile Sports Wagering Operators	\$588,000.00
18	Sports Wagering Suppliers	\$650,500.00
1	Official League Data Providers (OLDPs)	\$12,250.00

III. WORKSHEET

Retail Level I's [(7 Level I's for 15 Retail licensees + 13 GM's) X \$2,250]	\$265,500.00
Retail Level II's [(6 Level II's for 13 casinos + 20 Level II's for 2 sports districts) X \$175]	\$20,650.00
Total	\$286,150.00
Mobile Level I's [(7 Level I's for each of the 14 Mobile licensees) X \$2,250]	\$220,500.00
Mobile Level II's [(150 Level II's for each of the 14 Mobile licensees) X \$175]	\$367,500.00
Total	\$588,000.00
SW Supplier (18 applicants X \$35,000)	\$630,000.00
SW Supplier Level I's (6 Level I's total X \$2,250)	\$13,500.00
SW Supplier Level II's [(5 Level II's at 8 different suppliers) X \$175]	\$7,000.00
Total	\$650,500.00

OLDP (1 applicant X \$10,000)	\$10,000.00
Level I (1 Level I X \$2,250)	\$2,250.00
Total	\$12,250.00
GRAND TOTAL	\$1,536,900.00

IV. ASSUMPTIONS

Retail Sports Wagering Operators – 15 (13 casinos and 2 sports teams)

Mobile Sports Wagering Operators – 14 (6 Class A licensees, 6 sports teams, and 2 direct)

Sports Wagering Suppliers – 18

Official League Data Providers – 1

Level I's – 272 new Level I applicants

Level II's – 2,258 new Level II applicants

Application and license fees for the initial year are as follows:

Level I – Application fee is \$2,000 and the license fee is \$250;

Level II – Application fee is \$100 and the license fee is \$75;

Sports Wagering Supplier – Application fee is \$25,000 and the license fee is \$10,000;

OLDP – Application fee is \$10,000 and the license fee will be due at the end of the year and will depend on the amount of data sold during that year.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.100 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 435–436). Those sections with changes are re-printed here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule. Commission staff made four (4) comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.100 – Craig Williams, a member of the general public, suggested this proposed rule could greatly benefit from a section that specifically addresses duties to patrons such as but not limited to:

- Serving the same product, other than account-level promotions, to all patrons, including the same odds, markets, and user interface.
- Allowing patrons of all experience levels access to play with a good faith minimum win size offered to all patrons of no less than one hundred (\$100) for any individual wager (optional for the player to wager this much, of course).
- Displaying for the patron the maximum wager (such as one hundred (\$100), if not higher) in a newly-initiated bet slip prior to entry of the wager amount. It is fair play for the patron to have this information.
- Clearly outlining in the terms of service a definitive list of behaviors that will result in negative account actions such as limiting of wager amounts, account suspension or account closure.
- Clearly communicating at the point of such action to the patron via the patron’s email the item(s) on the list the patron is found to have done and which wager(s) were identified that initiated the account action, if any.

RESPONSE: The commission believes these are additional rules that represent substantive changes that stakeholders would not have the opportunity to provide feedback before becoming effective. The commission may consider including this language during a subsequent rule review, which will allow a public comment period on these changes. No changes have been made to the rule as a result of this comment.

COMMENT #2: 11 CSR 45-20.100(2)(A) – Staff suggested to add “as applicable” to make it clear that the first part of the standard only applies to Retail licensees and the second part only applies to Mobile licensees.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Maintain secure premises for the conduct of a retail sports wagering operation and a secure platform for the conduct of a mobile sports wagering operation, as applicable.”

COMMENT #3: 11 CSR 45-20.100(2)(C) – Staff suggested removing this subsection, which states, “Maintain an approved method of payout for valid vouchers and redeem for currency each valid voucher,” as it addressed in 11 CSR 45-20.480.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and removed the subsection. Revised remaining subsections (D)-(N) to (C)-(M).

COMMENT #4: 11 CSR 45-20.100(2)(J) and (K) – With the prior change in removing subsection (C), these comments now reference 11 CSR 45-20.100(2)(I) and (J). Cory Fox, with FanDuel, recommended replacing “promptly notify” with “make commercially reasonable efforts to promptly notify” to avoid providing incomplete information to the commission. Additionally, he suggested adding “(other than routine matters before gaming regulatory authorities)” following “regulatory proceedings” to 1. of subsection (K), which is now subsection (J).

RESPONSE: The commission recognizes that an investigation will not be complete when the requirement is to promptly notify the commission. The commission believes adding the language “other than routine matters” creates a subjective standard in regard to what needs to be reported which is less clear. No changes have been made to the rule as a result of this comment.

COMMENT #5: 11 CSR 45-20.100(9), 11 CSR 45-20.100(13), and 11 CSR 45-20.100(14) – Staff suggested to remove “the commission’s published minimum internal control standards,” as no minimum internal control standards have been published.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and removed the language.

COMMENT #6: 11 CSR 45-20.100(17) – Staff suggested to replace “prosecutorial agency” with “law enforcement agency.”

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “In addition to all other reporting requirements, Retail, Mobile, SW Supplier, and Official League Data Provider licensees shall notify the commission within fifteen (15) calendar days after receiving notification that any of the following persons is being investigated by a regulatory, administrative, or law enforcement agency for a violation of a rule, regulation, or statute relating to licensed gambling, Securities and Exchange Commission (SEC) regulations, Financial Crimes Enforcement Network (FinCEN) regulations, or criminal offenses, or has been disciplined or charged with a violation by such agencies:...”

11 CSR 45-20.100 Duties of Licensees and Applicants

(2) Each Retail and Mobile licensee has an ongoing duty to comply with the following:

(A) Maintain secure premises for the conduct of a retail sports wagering operation and a secure platform for the conduct of a mobile sports wagering operation, as applicable;

(B) Prevent unaccompanied access to designated nonpublic gaming areas by individuals who do not hold occupational licenses;

(C) Assume the primary responsibility for the sports wagering operation;

(D) Assume responsibility for payment of tax remittance to the state of Missouri;

(E) As required by the commission, obtain and install, at no cost to the state of Missouri, all hardware, software, and related accessories necessary to allow for remote monitoring of sports wagering by the commission;

(F) Accept no prohibited wagers;

(G) Install, post, and display signage as required by the commission, including signage indicating that sports wagering is limited to persons twenty-one (21) years of age or older and signage relating to problem gambling;

(H) Provide the commission, upon request, an accounting of all wagering activity or any subset of the wagering activity;

(I) To promptly notify the commission and any relevant sports governing body of any information relating to—

1. Abnormal betting activity or patterns that may indicate a concern with the integrity of a sporting event or events;

2. Suspicious or illegal betting activities if known to the licensee;

3. Any potential violation of the relevant sports governing body's internal rules and codes of conduct pertaining to sports wagering of which a licensee has knowledge; and

4. Any other conduct that corrupts a betting outcome of a sporting event or events for purposes of financial gain, including match fixing;

(J) To promptly notify the commission of any information relating to—

1. Criminal, disciplinary, or regulatory proceedings commenced against the licensee or affiliated person in connection with its gaming or sports wagering operations in any jurisdiction; and

2. Suspicious or illegal wagering activities, including use of funds derived from illegal activity, wagers to conceal or launder funds derived from illegal activity, using agents to place wagers, and using false identification;

(K) Provide to the commission any contract or commercial agreement to operate sports wagering on behalf of an excursion gambling boat or professional sports team;

(L) Document and investigate any report by an employee of any violation of Article III, Section 39(g) of the *Missouri Constitution*, state or federal laws or regulations, or the licensee's internal control system related to operations in Missouri, and provide a summary of those reports and investigations to the commission upon completion; and

(M) Report to the commission any facts the licensee has reasonable grounds to believe indicate a violation of Article III, Section 39(g) of the *Missouri Constitution*, state or federal laws or regulations, or the licensee's internal control system related to operations in Missouri.

(9) All licensees shall promptly report to the commission any facts which the licensee has reasonable grounds to believe indicate a violation of law (other than minor traffic violations), the licensee's internal controls for Missouri operations, or commission rules committed by licensees, their employees, or others, including, without limitation, the performance of licensed activities different from those permitted under their license.

(13) Retail, Mobile, SW Supplier, Official League Data Provider, and applicable Class B licensees shall ensure that all agents and SW Occupational licensees employed by said licensees have a working knowledge of Article III, Section 39(g) of the *Missouri Constitution*, Title 11 Division 45 of the *Code of State Regulations*, and the licensee's system of internal controls as they pertain to the responsibilities and limitations of their respective job positions.

(14) All SW Occupational licensees shall have a working knowledge of Article III, Section 39(g) of the *Missouri Constitution*, Title 11 Division 45 of the *Code of State Regulations*, and the internal controls of the licensees for whom they are currently employed by as they pertain to the responsibilities and limitations of their respective job positions.

(17) In addition to all other reporting requirements, Retail, Mobile, SW Supplier, and Official League Data Provider licensees shall notify the commission within fifteen (15) calendar days after receiving notification that any of the following persons is being investigated by a regulatory, administrative, or law enforcement agency for a violation of a rule, regulation, or statute relating to licensed gambling, Securities and Exchange Commission (SEC) regulations, Financial Crimes Enforcement Network (FinCEN) regulations, or criminal offenses, or has been disciplined or charged with a violation by such agencies:

- (A) The licensee;
- (B) The licensee's parent corporation; or
- (C) The licensee's officers or key persons.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.110 Prohibition and Reporting of Certain Transactions is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 436–438). No changes have been made to the text of the proposed rule, so it is not reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. Commission staff made no comments on the proposed rule.

COMMENT #1: 11 CSR 45-20.110(8) – Cory Fox, with FanDuel, suggested adding a new subsection (C) that states, “Any public or private issuance of debt by a publicly held Retail or Mobile licensee or publicly held holding company, if such issuance would result in a material change to such entity’s financial status.” Additionally, he recommended adding a new subsection (D) that states, “When applicable, the notice requirements herein may be satisfied by a Retail or Mobile licensee filing with the commission a copy of a report filed with the U.S. Securities and Exchange Commission, or equivalent foreign securities regulator, disclosing a transaction listed in subsections (A) - (C), within ten (10) days of filing with the securities regulator.”

RESPONSE: The commission is not adding (C) as it would burden licensees with additional reporting requirements. The commission is not adding (D) as it could delay commission notification. No changes have been made to the rule as a result of this comment.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.120 SW Occupational License Badge is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 438–439). No changes have been made to the text of the proposed rule, so it is not reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. Commission staff made no comments on the proposed rule.

TITLE 11—DEPARTMENT OF PUBLIC SAFETY
Division 45—Missouri Gaming Commission
Chapter 20—Sports Wagering

ORDER OF RULEMAKING

By the authority vested in the Missouri Gaming Commission under section 39(g) of Article III, *Missouri Constitution*, the commission adopts a rule as follows:

11 CSR 45-20.130 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on March 17, 2025 (50 MoReg 439). Those sections with changes are re-printed here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended April 16, 2025, and the commission held a public hearing on the proposed rule on April 17, 2025. There were four (4) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule.

COMMENT #1: 11 CSR 45-20.130(5) – Staff suggested to add “by the commission” to clarify that the waiver is granted by the commission.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to state, “Each SW Occupational licensee shall at all times while performing the functions of his or her position display on his or her person in a clearly visible manner a valid casino access badge, unless a waiver has been granted in writing by the commission for a particular job function.”

11 CSR 45-20.130 Casino Access Badge Requirements for Retail Locations on Excursion Gambling Boats

(5) Each SW Occupational licensee shall at all times while performing the functions of his or her position display on his or her person in a clearly visible manner a valid casino access badge, unless a waiver has been granted in writing by the commission for a particular job function.