

MISSOURI GAMING COMMISSION

COMMISSION RESOLUTION NO. 25-137  
REGARDING APPROVAL OF FINAL ORDERS OF RULEMAKING

August 13, 2025

WHEREAS, on May 13, 2025, the Commission approved the proposed rules and amendments listed on Exhibit A;

WHEREAS, a public hearing to receive comments on these proposed rules and amendments was held on July 17, 2025, at the Commission's offices. No comments were received at the public hearing, but comments were received during the public comment period regarding the above-referenced rules and amendments and each comment was addressed and a response provided;

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

SO ADOPTED.

  
Jon Zimmerman  
Chairman  
Missouri Gaming Commission

**EXHIBIT A**

**Final Orders of Rulemaking**

1. 11 CSR 45-1.010 Organization and Administration
2. 11 CSR 45-1.015 Code of Ethics
3. 11 CSR 45-1.020 Commission Meetings
4. 11 CSR 45-1.080 Participation in Games by Employees of the Commission
5. 11 CSR 45-1.100 Waivers and Variances
6. 11 CSR 45-2.010 Addressing Commission
7. 11 CSR 45-13.010 All Types of Hearings
8. 11 CSR 45-13.020 Hearing Officer
9. 11 CSR 45-13.030 Requests for Hearings
10. 11 CSR 45-13.040 Appearances
11. 11 CSR 45-13.045 Suitability Hearings for Gaming Applicants and Licensees and Exclusion Hearings
12. 11 CSR 45-13.050 Disciplinary Action Against Gaming Licensees
13. 11 CSR 45-13.055 Emergency Order Suspending License Privileges—Expedited Hearing
14. 11 CSR 45-13.060 Proceedings
15. 11 CSR 45-13.065 Settlements
16. 11 CSR 45-13.070 Transmittal of Record and Recommendation to the Commission
17. 11 CSR 45-13.080 Prohibition on Ex Parte Communications
18. 11 CSR 45-15.010 Duty to Exclude
19. 11 CSR 45-15.020 Distribution and Availability of Exclusion List
20. 11 CSR 45-15.030 Criteria for Exclusion and Placement on the Exclusion List
21. 11 CSR 45-15.040 Procedure for Entry of Names
22. 11 CSR 45-15.050 Petition for Removal from Exclusion List
23. 11 CSR 45-13.052 Sports Wagering Hearings
24. 11 CSR 45-20.010 Definitions
25. 11 CSR 45-20.140 Cooperation with Investigations
26. 11 CSR 45-20.150 Disciplinary Actions
27. 11 CSR 45-20.160 Temporary Suspension of Sports Wagering Activities
28. 11 CSR 45-20.170 Reporting Prohibited Conduct, Criminal Behavior, and Violations
29. 11 CSR 45-20.180 Integrity Monitoring
30. 11 CSR 45-20.190 Reserve Requirements
31. 11 CSR 45-20.200 Surveillance Requirements for Retail Licensees
32. 11 CSR 45-20.210 Required Surveillance Equipment and Coverage
33. 11 CSR 45-20.220 Information Technology
34. 11 CSR 45-20.230 SW Supplier Standards
35. 11 CSR 45-20.240 Testing, Certification, and Approval of Sports Wagering Equipment and Systems
36. 11 CSR 45-20.250 Sports Wagering Equipment Requirements
37. 11 CSR 45-20.260 Shipping, Maintenance, and Disposal of Sports Wagering Equipment

38. 11 CSR 45-20.270 Online Sports Wagering Platform Requirements
39. 11 CSR 45-20.280 Client Requirements
40. 11 CSR 45-20.290 Sports Wagering System Requirements
41. 11 CSR 45-20.300 Integrity and Security Assessment
42. 11 CSR 45-20.310 Software Change Management
43. 11 CSR 45-20.320 Online Sports Wagering Accounts
44. 11 CSR 45-20.330 Online Sports Wagering Account Suspension
45. 11 CSR 45-20.340 Requests to Authorize Events and Competitions
46. 11 CSR 45-20.350 Requests to Restrict and Exclude Wagering
47. 11 CSR 45-20.360 Prohibited Wagering Activity
48. 11 CSR 45-20.370 Personal Biometric Data Prohibition
49. 11 CSR 45-20.380 Internal Control System
50. 11 CSR 45-20.390 Internal Control System Requirements
51. 11 CSR 45-20.400 Forms
52. 11 CSR 45-20.410 House Rules
53. 11 CSR 45-20.420 Tier One and Tier Two Wagering
54. 11 CSR 45-20.430 Official League Data
55. 11 CSR 45-20.440 Commercial Reasonableness
56. 11 CSR 45-20.450 Placement of Wagers
57. 11 CSR 45-20.460 Redemption of Wagers
58. 11 CSR 45-20.470 Cancelled and Voided Wagers
59. 11 CSR 45-20.480 Retail Sports Wagering Locations and Operations
60. 11 CSR 45-20.490 Mandatory Drops
61. 11 CSR 45-20.500 Accounting Records
62. 11 CSR 45-20.510 Record Retention
63. 11 CSR 45-20.520 Standard Financial and Statistical Records
64. 11 CSR 45-20.530 Annual and Special Audits and Other Reporting Requirements
65. 11 CSR 45-20.540 Wagering Tax
66. 11 CSR 45-20.550 Procedures for Accounting and Revenue Audit
67. 11 CSR 45-20.560 Procedures for Internal Audit
68. 11 CSR 45-20.570 Promotions and Marketing
69. 11 CSR 45-20.580 Responsible Gaming
70. 11 CSR 45-20.590 Compulsive Gaming Prevention Fund
71. 11 CSR 45-20.600 Self-Excluded Persons List Created—Right to Self-Exclude from Sports Wagering Activities
72. 11 CSR 45-20.610 Procedure for Applying for Placement on the List of Self-Excluded Persons
73. 11 CSR 45-20.620 Procedure for Entry of Names onto the List of Self-Excluded Persons
74. 11 CSR 45-20.630 Confidentiality of the List of Self-Excluded Persons
75. 11 CSR 45-20.640 Procedure to Re-Establish Self-Exclusion on the List of Self-Excluded Persons
76. 11 CSR 45-20.650 Duties of Licensees Regarding the List of Self-Excluded Persons

(End of Document)

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 1—Organization and Administration**

**ORDER OF RULEMAKING**

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

**11 CSR 45-1.010 Organization and Administration is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 776). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 1—Organization and Administration**

**ORDER OF RULEMAKING**

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

**11 CSR 45-1.015 Code of Ethics is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 776). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 1—Organization and Administration**

**ORDER OF RULEMAKING**

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

**11 CSR 45-1.020 Commission Meetings is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 776–777). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 1—Organization and Administration**

**ORDER OF RULEMAKING**

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

**11 CSR 45-1.080** Participation in Games by Employees of the Commission **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 777). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 1—Organization and Administration**

**ORDER OF RULEMAKING**

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

**11 CSR 45-1.100 Waivers and Variances is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 777). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 2—Practice and Procedures Before the Commission**

**ORDER OF RULEMAKING**

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

**11 CSR 45-2.010 Addressing Commission is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 777–778). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.010 All Types of Hearings is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 778). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.020 Hearing Officer is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 778). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.030 Requests for Hearings is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 778–779). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.040 Appearances is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 779). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.045** Suitability Hearings for Gaming Applicants and Licensees and Exclusion Hearings **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 779). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.050** Disciplinary Action Against Gaming Licensees **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 780). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.055 Emergency Order Suspending License Privileges – Expedited Hearing is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 781–782). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.060 Proceedings is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 782–783). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.065 Settlements is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 783). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.070** Transmittal of Record and Recommendation to the Commission **is amended**.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 783). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**ORDER OF RULEMAKING**

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

**11 CSR 45-13.080 Prohibition on Ex Parte Communications is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 783–784). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 15—Exclusion of Person**

**ORDER OF RULEMAKING**

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

**11 CSR 45-15.010 Duty to Exclude is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 784). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed amendment.

COMMENT #1: Section (2) – Rebecca London, with DraftKings, suggested revising the language to eliminate the requirement to cancel any unresolved sports wagers for patrons who are excluded.  
RESPONSE: This rule relates to individuals excluded involuntarily by the Missouri Gaming Commission. Therefore, any unresolved wagers will need to be voided and the wager refunded. 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 15—Exclusion of Person**

**ORDER OF RULEMAKING**

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

**11 CSR 45-15.020 Distribution and Availability of Exclusion List is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 784–785). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed amendment.

COMMENT #1: Section (1) – Jeremiah Weinstock, a Missouri constituent, suggested revising the language to include cell phone numbers for excluded individuals as part of the information the commission provides to licensees.

RESPONSE: This rule relates to individuals excluded involuntarily by the Missouri Gaming Commission. The commission does not have cell phone numbers for every excluded person. No changes have been made to the rule as a result of this comment.

COMMENT #2: Sections (1) and (2) – Rebecca London, with DraftKings, suggested revising the language to remove the requirement for licensees to provide written acknowledgment of receipt of the excluded persons list.

RESPONSE: This list is updated approximately once a year and it is not an undue burden for licensees to acknowledge receipt. 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 15—Exclusion of Person**

**ORDER OF RULEMAKING**

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

**11 CSR 45-15.030** Criteria for Exclusion and Placement on the Exclusion **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 786). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 15—Exclusion of Person**

**ORDER OF RULEMAKING**

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

**11 CSR 45-15.040** Procedure for Entry of Names **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 786). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 15—Exclusion of Person**

**ORDER OF RULEMAKING**

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

**11 CSR 45-15.050** Petition for Removal from Exclusion List **is amended.**

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on June 16, 2025 (50 MoReg 786). No changes have been made to the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed amendment on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed amendment.

**TITLE 11—DEPARTMENT OF PUBLIC SAFETY**  
**Division 45—Missouri Gaming Commission**  
**Chapter 13—Hearings**

**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 45-13.052 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 780–781). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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: Section (1) – A staff member suggested revising the language to add that a person who disagrees with a written determination of the commission may request a hearing.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

**11 CSR 45-13.052 Sports Wagering Hearings**

(1) A person whose application for a license issued under 11 CSR 45-20 has been denied, against whom a disciplinary action has been initiated, or who disagrees with a written determination of the commission may request a hearing under this chapter. The rules in this chapter shall be read together with Chapter 536, 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 45-20.010 Definitions is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 787–789). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written 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 45-20.140 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 789). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

**COMMENT #1:** Sections (1) and (2) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (2) – Daniel Rainieri, with BetMGM, suggested revising “calendar days” to “business days” to align with industry standards.

**RESPONSE:** Given that this industry operates 24 hours a day, using “business days” may not be clear to all parties while “calendar days” is clear. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Sections (3) and (4) – The Joint Committee on Administrative Rules suggested removal of these sections because the Missouri Gaming Commission does not have jurisdiction over sports governing bodies and how they handle information.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised to remove these sections in their entirety.

**11 CSR 45-20.140 Cooperation with Investigations**

(1) Retail, Mobile, SW Supplier, and Official League Data Provider licensees shall cooperate with investigations conducted by law enforcement agencies, regulatory bodies, and sports governing bodies, including, but not limited to, using commercially reasonable efforts to provide or facilitate the provision of wagering information, including account-level sports wagering information. Disclosures under this rule are subject to a licensee's obligations to comply with federal, state, and local laws and regulations, including those relating to privacy and personally identifiable information.

(2) Retail, Mobile, SW Supplier, and Official League Data Provider licensees shall notify the commission within five (5) calendar days of a request from a law enforcement agency or sports governing body for cooperation with an investigation regarding sports wagering operations in Missouri, except where prohibited by the terms of a law enforcement subpoena. The notification shall be in writing and shall include a detailed description of the request.

**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 45-20.150 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 790). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received six (6) written comments on the proposed rule. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Subsection (1)(C) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language because it is overly broad and lacks clear, enforceable criteria, making it difficult for regulators and operators to apply consistently. He suggested revising it to state, “willfully failing to disclose an ineligibility determination, license denial, suspension, or revocation in any state or gaming jurisdiction...”

**RESPONSE:** “Willfully failing to disclose an ineligibility determination, license denial, suspension, or revocation in any state or gaming jurisdiction” is a substantially different standard from the current language. No changes have been made to the rule as a result of this comment.

**COMMENT #2:** Subsection (1)(D) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language because it lacks a clear, enforceable standard, making it difficult for both regulators and operators to apply consistently. Without a uniform definition of what constitutes an “organized crime group” or “recognized organized crime figure,” he stated that enforcement could become arbitrary and subjective. By specifying “knowingly” and requiring formal identification by a law enforcement or regulatory agency, he suggested that this revision ensures that operators can implement clear compliance processes to prevent such associations while allowing regulators to enforce the rule based on objective, verifiable criteria.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised to remove this subsection in its entirety. Renumbered remaining subsections.

**COMMENT #3:** Subsection (1)(E) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language because it lacks a clear, enforceable standard, making it difficult for both regulators and operators to apply consistently.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and removed paragraph (1)(E)1.

Retained and renumbered remaining paragraphs.

COMMENT #4: Subsection (1)(Q) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language because it is too broad and lacks a clear standard for enforcement.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #5: Subsection (1)(R) – The Joint Committee on Administrative Rules suggested the addition of “of this state or any other state or country” to clarify the restriction.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #6: Subsection (1)(U) – Cory Fox, with FanDuel, suggested revising the language to add the qualifier that states, “willfully or repeatedly.”

RESPONSE: Violations under this section could be significant enough that one instance could be grounds for disciplinary action. Additionally, requiring the conduct to be willful substantially changes the standard of this subsection. No changes have been made to the rule as a result of this comment.

COMMENT #7: Section (3) – The Joint Committee on Administrative Rules suggested revising this section to provide clarification on how individuals can seek permission to reapply for licensure after having a license revoked.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #8: Section (3) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language to only require a one-year waiting period to reapply after a revocation.

RESPONSE: Once a license has been revoked it is highly unlikely the commission would grant a license a year later. No changes have been made to the rule as a result of this comment.

COMMENT #9: Section (4) – The Joint Committee on Administrative Rules suggested removal of this section as it appears duplicative of section (1).

RESPONSE AND EXPLANATION OF CHANGE: Revised to clarify the commission has the authority to fine any person who is required to have a license but does not, as noted in Article III, Section 39(g), of the *Missouri Constitution*.

## **11 CSR 45-20.150 Disciplinary Actions**

(1) Licensees shall be subject to the imposition of fines, license probation, license suspension, license revocation, or other disciplinary action for any violation of Article III, Section 39(g), of the *Missouri Constitution*, law, or regulation. The following acts or omissions may be grounds for discipline:

(D) Employing, associating with, or participating in any enterprise or business with persons—

1. Who have law enforcement records involving crimes of moral turpitude; or

2. Who have failed to cooperate with any officially constituted investigatory or administrative body;

(E) Failing to establish and maintain standards and procedures designed to prevent ineligible or unsuitable persons from being employed by the licensee;

- (F) Misrepresenting any information to the commission;
- (G) Intentionally making, causing to be made, or aiding, assisting, or procuring another to make any false statement in any report, disclosure, application, permit, form, or any other document, including improperly notarized documents;
- (H) Submitting tardy, inaccurate, or incomplete material or information to the commission;
- (I) Obstructing or impeding the lawful activities of the commission;
- (J) Willfully or repeatedly failing to pay amounts due or to be remitted to the state of Missouri;
- (K) Failing to timely pay amounts due or to be remitted to the state of Missouri;
- (L) Failing to timely pay a fine imposed by the commission;
- (M) Failing to respond in a timely manner to communications from the commission;
- (N) Aiding and abetting a violation by a commission member or employee, or other government official, of a requirement established by statute, resolution, ordinance, personnel code, or code of conduct;
- (O) Violations of Article III, Section 39(g), of the *Missouri Constitution* and laws, rules, and regulations by any person identified as a key person;
- (P) Knowingly employing or associating in business affairs with any enterprise or business with a person determined unsuitable to be a licensee or a key person of an applicant or licensee by the commission or any other gaming jurisdiction;
- (Q) Facilitating, enabling, or participating in sports wagering other than in accordance with Article III, Section 39(g), of the *Missouri Constitution* and laws, rules, and regulations of this state or any other state or country;
- (R) Engaging in, or facilitating, unfair methods of competition or unfair or deceptive acts or practices, including the use or employment of any deception, fraud, false pretense, false promise or misrepresentation, or the concealment, suppression, or omission of any material fact in the conduct of any sports wagering operation;
- (S) Acting in bad faith in the conduct of any business, transaction, or interaction with any other applicant, licensee, or the commission;
- (T) Being found, through final determination by a court or regulatory body, to have engaged in unfair labor practices, discrimination, or violations of regulation of gaming or sports wagering;
- (U) Failing to satisfy any judgments, orders, or decrees of any court;
- (V) Failing to maintain suitability for licensure; or
- (W) Any cause that, if known to the commission, would have resulted in the denial of a license.

(3) A person who has had a license revoked by the commission may not reapply for a license without permission from the commission. Permission may be requested by submission of written correspondence to the commission for consideration at a regularly scheduled commission meeting.

(4) The commission may impose fines upon any person required to hold a license but does not.

**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 45-20.160** Temporary Suspension of Sports Wagering Activities **is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 790–791). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written 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 45-20.170 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 791). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

COMMENT #1: Section (3) – The Joint Committee on Administrative Rules suggested to also cite section 313.847, RSMo.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to add section 313.847, RSMo, to make it clear that the commission is protecting the records in the same manner as for excursion gambling boat licensees.

COMMENT #2: Section (4) – The Joint Committee on Administrative Rules suggested this is overly broad and exceeds the commission’s authority.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and removed the section in its entirety.

**11 CSR 45-20.170 Reporting Prohibited Conduct, Criminal Behavior, and Violations**

(3) The identity of any individual making a report and the contents of any report shall be confidential and not be subject to disclosure, pursuant to Chapter 610 and section 313.847, 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 45-20.180 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 792–793). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Sections (1)-(3) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (5) – The Joint Committee on Administrative Rules suggested to add language describing how to request an approval.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Section (7) – The Joint Committee on Administrative Rules suggested revising this section so it does not imply the Missouri Gaming Commission has authority over sports governing bodies and how they handle information.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Private Cost Statement – A staff member suggested revising the fiscal note for the number of companies anticipated to obtain Retail and Mobile licenses.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.180 Integrity Monitoring**

(1) Retail licensees and Mobile licensees shall contract with an independent, commission-licensed integrity monitoring provider.

(2) Retail licensees and Mobile licensees shall have controls in place to identify abnormal wagering activity and report such activity to an integrity monitoring provider.

(3) All integrity monitoring providers shall share information with each other and shall disseminate all reports of abnormal wagering activity to all participating licensees. All Retail licensees and Mobile licensees shall review such reports and notify the integrity monitoring provider of whether or not they have experienced similar activity.

(5) A Retail or Mobile licensee receiving a report of suspicious wagering activity shall be permitted to suspend wagering on events related to the report but may only cancel related wagers after written commission approval pursuant to 11 CSR 45-20.470(3).

(7) The commission may share information regarding the integrity of events. The commission may use information received from any source, including a sports governing body, to determine whether wagering shall be permissible on a particular event or wager type.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of ninety thousand dollars (\$90,000) versus the estimated annual cost of forty-eight thousand dollars (\$48,000), 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**

<b>Rule number/name:</b>	11 CSR 45-20.180 Integrity Monitoring
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
15	Companies offering retail and mobile sports wagering	\$90,000.00

**III. WORKSHEET**

<b>Annual Estimates</b>	
Companies offering retail and mobile sports wagering (15 companies x \$6,000 annually)	\$90,000.00

**IV. ASSUMPTIONS**

Each company offering retail and mobile sports wagering will be charged \$6,000 annually for integrity monitoring services.

The integrity monitoring annual fee is charged per company and not per license.

The commission anticipates that there will be 14 individual companies offering mobile sports wagering that will need to purchase integrity monitoring services.

The commission anticipates that there will be 11 Retail licensees, 10 of which will not be charged an integrity monitoring fee as the company also has a mobile sports wagering operation.

**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 45-20.190 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 794). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

**COMMENT #1:** Section (1) – Rebecca London, with DraftKings, suggested revising the language to add a definition of outstanding sports wagering liability that states, “The outstanding sports wagering liability shall be the sum of the following amounts: amounts held for player accounts; aggregate amounts accepted as wagers on sports events whose outcomes have not been determined; and amounts owed but unpaid on winning wagers.”

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Sections (1) and (2) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Private Cost Statement – The Joint Committee on Administrative Rules suggested the addition of a fiscal note to address the reserve requirement for licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and added a fiscal note.

**11 CSR 45-20.190 Reserve Requirements**

(1) Retail licensees and Mobile licensees shall maintain a reserve in the form of cash, cash equivalents, payment processor reserves, payment processor receivables, surety bond, irrevocable letter of credit, or combination thereof, of not less than the greater of five hundred thousand dollars (\$500,000), or the amount necessary to cover the outstanding sports wagering liability. Cash equivalents are investments with an original maturity of three (3) months or less which would be permissible investments under Missouri law for state monies held by the state treasurer. The outstanding sports wagering liability shall be the sum of cashable funds held in player accounts, the aggregate amounts accepted as wagers on sporting events whose outcomes have not been determined, and amounts owed but unpaid on winning wagers.

(2) If, at any time, the Retail licensee's or Mobile licensee's available reserve should be less than the amount required by this rule, the licensee shall notify the commission of this deficiency within forty-eight (48) hours. A licensee may satisfy the reserve requirement in this rule if the licensee adds sufficient funds to cover the calculated requirement prior to the end of the following business day. Failure to maintain the minimum reserve required by this rule or failure to notify the commission of any deficiencies is grounds for disciplinary action.

*REVISED PRIVATE COST: The cost to private entities is an estimated cost of \$12,500,000 in the aggregate versus the estimated cost of less than five hundred dollars (\$500) in the aggregate, 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**

<b>Rule number/name:</b>	11 CSR 45-20.190 Reserve Requirements
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
25	Retail and Mobile licensees	\$12,500,000.00

**III. WORKSHEET**

<b>Estimates</b>	
Retail and Mobile sports wagering licensees (25 licensees x \$500,000)	\$12,500,000.00

**IV. ASSUMPTIONS**

Each licensee offering Retail and Mobile sports wagering will be required to maintain a reserve of \$500,000 for each license it holds.

The commission anticipates 14 Mobile licensees and 11 Retail licensees.

**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 45-20.200 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 794–796). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

**COMMENT #1:** Section (12) – The Joint Committee on Administrative Rules suggested the addition of language to clarify when video recordings of investigations may be released.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Private Cost Statement – The Joint Committee on Administrative Rules suggested revising the fiscal note to reflect additional surveillance agents and the cost of developing a surveillance plan.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised the fiscal note to reflect three surveillance agents for the two sports team retail licensees and the cost of the surveillance plans.

**11 CSR 45-20.200 Surveillance Requirements for Retail Licensees**

(12) A surveillance release log shall be maintained to record who receives a copy of video recordings. Video recordings of criminal or regulatory investigations or violations shall not be released to anyone without the approval of the commission or pursuant to a lawful court order.

*REVISED PRIVATE COST: The cost to private entities is an estimated initial cost of five thousand one hundred dollars (\$5,100) and an annual cost of three hundred sixty thousand dollars (\$360,000) versus the estimated annual cost of two hundred forty thousand dollars (\$240,000), 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**

<b>Rule number/name:</b>	11 CSR 45-20.200 Surveillance Requirements for Retail Licensees
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
2	Sports Team Retail Licensees	\$362,400.00
9	Casino Retail Licensees	\$2,700.00

**III. WORKSHEET**

<b>Estimates</b>	
Sports Team Retail Licensees 2 x (\$60,000 x 3 surveillance agents)	\$360,000.00
Sports Team Retail Licensees 2 x (40 hours x \$30 per hour labor cost)	\$2,400.00
Casino Retail Licensees 9 x (10 hours x \$30 per hour labor cost)	\$2,700.00
<b>TOTAL</b>	<b>\$365,100.00</b>

**IV. ASSUMPTIONS**

The commission anticipates that two sports teams will elect to have a retail sportsbook.

The cost for a sports team to employ three surveillance agents is \$180,000 annually.

The length of time for a sports team to develop a surveillance plan is approximately 40 hours and the labor cost is approximately \$30 per hour.

The commission anticipates that 9 casinos will operate a retail sportsbook or partner with an operator to conduct retail operations.

The casinos will not hire additional surveillance personnel to monitor sportsbook operations.

Casinos would need to amend their current surveillance plans. This would take approximately 10 hours at \$30 per hour.

**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 45-20.210 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 797–799). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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: Private Cost Statement** – A staff member suggested revising the fiscal note to reflect the new anticipated number of Retail licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised the fiscal note to change the number of Retail licensees.

**11 CSR 45-20.210 Required Surveillance Equipment and Coverage**

*REVISED PRIVATE COST: The cost to private entities is an estimated cost of ninety-four thousand dollars (\$94,000) in the aggregate versus the estimated cost of one hundred eighteen thousand dollars (\$118,000) in the aggregate, 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**

<b>Rule number/name:</b>	11 CSR 45-20.210 Required Surveillance Equipment and Coverage
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
9	Casino Retail Licensees	\$54,000.00
2	Sports team Retail Licensees	\$40,000.00

**III. WORKSHEET**

<b>Estimates</b>	
Casino Retail licensees (9 x \$6,000)	\$54,000.00
Sports team Retail licensees (2 x \$20,000)	\$40,000.00
<b>TOTAL</b>	<b>\$94,000.00</b>

**IV. ASSUMPTIONS**

The commission anticipates that nine (9) casinos will have a retail sportsbook.

The cost to add the required cameras and related surveillance equipment will be \$6,000 per casino.

The commission anticipates that two (2) sports teams will elect to have a retail sportsbook.

The cost to add the required cameras and related surveillance equipment will be \$20,000 for each sports teams' retail sportsbook locations.

**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 45-20.220 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on June 16, 2025 (50 MoReg 800–801). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received five (5) written comments on the proposed rule. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

**COMMENT #1:** Sections (1), (3), (5), (6), (10), (13), and (18) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (1) – Rebecca London, with DraftKings, suggested revising the language to add that the information technology function shall not be outsourced without the prior written approval from the commission.

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised to allow information technology functions to be outsourced only to SW Supplier licensees.

**COMMENT #3:** Section (2) – Cory Fox, with FanDuel, suggested revising the language to only require the highest-ranking employee ultimately responsible for the sports wagering system to possess a commission-issued occupational license.

**RESPONSE:** Any individual with write capability to the sports wagering system could impact the integrity of the sports wagering operation. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Section (2) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language to state, “who has the authority to approve and implement changes” instead of “who has write access.”

**RESPONSE:** Any individual with write capability to the sports wagering system could impact the integrity of the sports wagering operation. No changes have been made to the rule as a result of this comment.

COMMENT #5: Section (2) – Rebecca London, with DraftKings, suggested revising the language to limit the licensing requirement to supervisors.

RESPONSE: Any individual with write capability to the sports wagering system could impact the integrity of the sports wagering operation. No changes have been made to the rule as a result of this comment.

COMMENT #6: Section (4) – Rebecca London, with DraftKings, suggested revising the language to clarify that this includes comprehensive cloud computing platforms and/or data centers.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #7: Private Cost Statement – The Joint Committee on Administrative Rules suggested the addition of a fiscal note to address the cost of required IT department personnel.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to include a fiscal note to account for the cost of two IT employees.

## **11 CSR 45-20.220 Information Technology**

(1) Retail licensees and Mobile licensees shall have an information technology department that is responsible for the quality, reliability, and accuracy of all computer systems used in the sports wagering operation. Information technology functions shall only be outsourced to SW Supplier licensees.

(3) Retail licensees and Mobile licensees shall ensure that duties in the information technology department are adequately segregated and monitored to detect procedural errors, unauthorized access to financial transactions and assets, and to prevent the concealment of fraud.

(4) The information technology environment and infrastructure shall be maintained in a secured physical location, which may include but is not limited to a comprehensive cloud computing platform or data center, that is restricted to authorized employees.

(5) Retail licensees and Mobile licensees shall adopt procedures in the internal controls for responding to, monitoring, investigating, resolving, documenting, and reporting security incidents associated with information technology systems.

(6) System enforced security parameters for passwords shall be documented in the Retail licensee's or Mobile licensee's internal control system and meet industry standards.

(10) Retail licensees and Mobile licensees shall generate on request user access listings, which shall include at a minimum:

(13) Except when a Retail licensee or Mobile licensee implements multi-factor authentication controls, user accounts shall be automatically locked out after at most five (5) failed login attempts. The system may release a locked out account after thirty (30) minutes have elapsed.

(18) Retail licensees and Mobile licensees shall maintain a backup of all data related to sports wagering. The commission may approve the use of cloud storage located in the United States for duplicated data upon written request by the licensee.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of \$1,680,000 versus the estimated cost of less than five hundred dollars (\$500) in the aggregate, 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**

<b>Rule number/name:</b>	11 CSR 45-20.220 Information Technology
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
7	Retail Licensees	\$1,680,000.00

**III. WORKSHEET**

<b>Estimates</b>	
Sports Team Retail Licensees 2 x (\$120,000 x 2 IT employees)	\$480,000.00
Retail Licensees 5 x (\$120,000 x 2 IT employees)	\$1,200,000.00
<b>TOTAL</b>	<b>\$1,680,000.00</b>

**IV. ASSUMPTIONS**

The commission anticipates 11 Retail licensees.

- The commission anticipates 2 sports teams will elect to have a retail sportsbook and will need to employ 2 IT employees.
- The commission anticipates 5 sports wagering companies will obtain a Retail license in partnership with a casino and these 5 companies will need to employ at least 2 IT employees.
- The commission anticipates 4 casinos will obtain the Retail license and can utilize their current IT departments.

The cost to employ an IT employee is \$120,000 annually.

The commission assumes all Mobile licensees will have existing IT department and will not need to hire any additional IT employees.

**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 45-20.230 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on June 16, 2025 (50 MoReg 801–803). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made five (5) comments on the proposed rule.

**COMMENT #1:** Section (1) – The Joint Committee on Administrative Rules suggested adding qualifying language on the types of items required to be purchased from a licensed supplier.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (2) – The Joint Committee on Administrative Rules suggested revising to clarify all types of complaints received should be maintained in the log.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Section (3) – Travis Foley, with BMM Testlabs, suggested revising the language to remove the last sentence because performing quality assurance and pre-compliance testing prior to the product being submitted to the ITL for certification does not affect the ITL’s independence and impartiality.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Section (8), Subsections (8)(A) and (8)(C), Section (9), Subsection (9)(B), Section (10), and Section (13) – The Joint Committee on Administrative Rules suggested revising the language as it provided the commission overly-broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #5:** Section (14) – The Joint Committee on Administrative Rules suggested revising the language to clarify the acceptable standards.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #6:** Private Cost Statement – The Joint Committee on Administrative Rules suggested

revising the fiscal note to reflect the private cost to ITLs for providing the commission with copies of their software verification tools.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the fiscal note to reflect this private entity cost.

COMMENT #7: Private Cost Statement – A staff member suggested revising the fiscal note to reflect the number of Retail licensees affected versus the number of systems.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the fiscal note to change the number of Retail licensees affected.

## **11 CSR 45-20.230 SW Supplier Standards**

(1) An SW Supplier licensee who does not manufacture the sports wagering equipment, systems, or supplies that it sells must notify the commission of the specific components being sold by the SW Supplier that it does not manufacture, and must purchase said items from a licensed SW Supplier as directed by the commission if regulatory oversight is necessary for the integrity of sports wagering.

(2) An SW Supplier licensee shall maintain a log of all complaints received relating to sports wagering products and services provided and shall provide the log and supporting documentation to the commission upon request.

(3) Licensed independent testing laboratories (ITLs) shall not participate in the development of any products they are testing and certifying to maintain their independence. Other than to perform an evaluation for regulatory compliance, ITLs shall not participate, consult, or otherwise be involved in the design, development, programming, or manufacturing of any sports wagering equipment, sports wagering system, or any component thereof or modification thereto.

(8) Upon the ITL's certification of sports wagering equipment or systems, a unique identification code or signature acceptable to and approved by the commission shall be assigned to each critical component as defined in 11 CSR 45-20 using a tool, device, mechanism, or other methodology which possesses the ability to export results. The assigned identification code or signature and the means for generating such code or signature shall be included on all certification letters, documents, reports, and databases as determined by the commission.

(A) The ITL shall provide the commission with step-by-step verification procedures for each tool, device, mechanism, or other methodology used to assign the unique identification codes or signatures.

(C) The ITL shall support the verification tools, devices, or mechanisms and replace, repair, update, or upgrade them as deemed necessary by the commission to ensure the integrity of sports wagering.

(9) The ITL shall develop and maintain a database of all sports wagering equipment or systems certified by the ITL for the state of Missouri.

(B) The database and report(s) must be current as of the end of the previous business day and accessible by the commission.

(10) The ITL shall provide, free of charge to the commission, technical and regulatory compliance support. In instances where the ITL providing the support is also conducting the testing, the time allocated for support shall be considered part of the testing process and the ITL may bill the licensee for the cost of the technical support. In instances where the ITL providing the support is not conducting the testing, the commission may require the licensee to reimburse the ITL at the rate the ITL charges licensees for such support.

(13) The ITL shall conduct forensic evaluations or analyses on sports wagering equipment and systems as directed by the commission if there is concern with the integrity of the equipment or system. A final forensic report shall be drafted and provided to the commission outlining all testing performed, the cause of the problem, and the outcome of the investigation, if specifically identified.

(14) The ITL shall maintain copies of the results of any International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17020/17025 or similar standard audits or reviews and shall forward a copy of the results to the commission within fifteen (15) calendar days of when they become available to the ITL.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of thirty-five thousand one hundred fifty dollars (\$35,150) versus the estimated annual cost of eighteen thousand seven hundred dollars (\$18,700), 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**

<b>Rule number/name:</b>	11 CSR 45-20.230 SW Supplier Standards
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
11	Retail licensees	\$5,100.00
14	Mobile licensees	\$11,900.00
2	Supplier licensees (Independent Test Labs)	\$18,150.00

**III. WORKSHEET**

<b>Annual Estimates</b>	
Retail licensees (6 systems x 5 hours x \$170 per hour)	\$5,100.00
Mobile licensees (14 systems x 5 hours x \$170 per hour)	\$11,900.00
Supplier licensees (2 licensees x 11 tools x \$825 per tool)	\$18,150.00
<b>TOTAL</b>	<b>\$35,150.00</b>

**IV. ASSUMPTIONS**

The commission anticipates needing approximately 5 hours of annual technical support from independent testing laboratories (ITLs) regarding the functionality of sports wagering systems.

11 Retail licensees will utilize 6 different sports wagering systems. (4 common sports wagering systems will be utilized by 9 casinos and 2 sports wagering systems will be utilized by 2 sports teams.)

14 Mobile licensees will each utilize a different sports wagering system. (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses.)

The hourly rate for an independent testing laboratory (ITL) is \$170.

The commission anticipates 2 independent testing laboratories will need to provide their verification tools for commission staff to use to verify sports wagering systems. The commission will need 11 copies of the tool provided from each independent test laboratory to test sports wagering systems.

The cost of providing one copy of the tool is \$825 annually.

**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 45-20.240 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the Missouri Register on June 16, 2025 (50 MoReg 804–805). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Subsection (3)(E) – The Joint Committee on Administrative Rules suggested revising the language to clarify the standards for approval.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (6) – The Joint Committee on Administrative Rules suggested revising the language to clarify the standards for approval or denial of the equipment or systems.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Section (8) – The Joint Committee on Administrative Rules suggested revising the language to clarify when additional testing may be required.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Private Cost Statement – A staff member suggested revising the fiscal note to reflect the new anticipated number of Retail licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised the fiscal note to change the number of Retail licensees.

**11 CSR 45-20.240 Testing, Certification, and Approval of Sports Wagering Equipment and Systems**

(3) All sports wagering equipment and systems testing shall be documented in a report issued by the ITL and provided to the commission which includes—

(E) Any additional information necessary to ensure the integrity of the equipment and systems for approval.

(6) After the review of the sports wagering equipment and systems, the commission may approve the sports wagering equipment or systems for use in Missouri or may deny the sports wagering equipment or systems that do not meet the standards of this rule.

(8) The sports wagering system shall be tested and recertified by a licensed ITL at least once every twelve (12) months. Additional testing may be required if a substantial system change occurs, pursuant to 11 CSR 45-20.310.

*REVISED PRIVATE COST: The cost to private entities is an estimated initial cost of four hundred thirty-five thousand two hundred dollars (\$435,200) and an annual cost of two hundred seventeen thousand six hundred dollars (\$217,600) versus the estimated initial cost of four hundred eighty-nine thousand six hundred dollars (\$489,600) and an annual cost of two hundred forty-four thousand eight hundred dollars (\$244,800), 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**

<b>Rule number/name:</b>	11 CSR 45-20.240 Testing, Certification, and Approval of Sports Wagering Equipment and Systems
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
11	Retail licensees	\$224,400.00
14	Mobile licensees	\$428,400.00

**III. WORKSHEET**

<b>Initial Certification</b>	
Retail licensees (11 licensees x 80 hours x \$170 per hour)	\$149,600.00
Mobile licensees (14 licensees x 120 hours x \$170 per hour)	\$285,600.00
<b>Annual Recertification</b>	
Retail licensees (11 licensees x 40 hours x \$170 per hour)	\$74,800.00
Mobile licensees (14 licensees x 60 hours x \$170 per hour)	\$142,800.00
<b>TOTAL</b>	<b>\$652,800.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams)

14 Mobile licensees (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses)

The hourly rate for an independent testing laboratory (ITL) is \$170.

The number of hours for an initial certification for a retail licensee is approximately 80 hours.

The number of hours for an initial certification for a mobile licensee is approximately 120 hours.

The number of hours for an annual recertification for a retail licensee is approximately 40 hours.

The number of hours for an annual recertification for a mobile licensee is approximately 60 hours.

**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 45-20.250 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 806–807). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Section (1) – The Joint Committee on Administrative Rules suggested revising the language as it was overly broad.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (5) – Jeremiah Weinstock, a Missouri constituent, suggested revising the language to include a requirement for the ticket to include a responsible gaming message along with the problem gambling helpline number.

**RESPONSE:** The commission may consider adding this requirement in the future. It is unknown if current systems could comply with this. No changes have been made to the rule as a result of this comment.

**11 CSR 45-20.250 Sports Wagering Equipment Requirements**

(1) Sports wagering equipment software shall contain sufficient information to identify the software and version number of the information stored on the sports wagering equipment. Sports wagering equipment software critical components shall be capable of verification.

**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 45-20.260 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 807). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Section (2) – The Joint Committee on Administrative Rules suggested revising the language to limit the scope of sports wagering equipment referenced to not include applications on patrons’ phones.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Sections (2) and (5) – A staff member suggested clarifying the language to make it clear that both Retail licensees and Mobile licensees must comply with the rule.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.260 Shipping, Maintenance, and Disposal of Sports Wagering Equipment**

(2) Retail licensees and Mobile licensees shall only be permitted to sell, distribute, transfer, or supply kiosks to any person in the state of Missouri who is a Retail, Mobile, or SW Supplier licensee.

(5) Retail licensees and Mobile licensees shall only dispose of sports wagering equipment in a manner as prescribed in its approved internal control system, ensuring no critical or confidential data is retrievable after disposal.

**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 45-20.270 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 808). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received three (3) written comments on the proposed rule. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

**COMMENT #1:** Section (1) – The Joint Committee on Administrative Rules suggested revising the language to clarify who is testing, certifying, and approving it.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (5) – Jeremiah Weinstock, a Missouri constituent, suggested revising the language to state “problem gambling” instead of “compulsive gaming.” Additionally, he suggested placing default low-risk wagering limits on the online platform.

**RESPONSE:** This is language in Article III, Section 39(g), of the *Missouri Constitution* and a requirement of all online platforms. Additionally, the default wagering limit may be different for each individual. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (6) – The Joint Committee on Administrative Rules suggested revising as the language was too narrow as it does not allow for search warrants, civil court orders, or tax purposes.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised to remove this section in its entirety. Renumbered remaining sections.

**COMMENT #4:** Lindsay Slader, with GeoComply, suggested revising the language to include requirements addressing location spoofing and manipulation, device integrity, robust location data sourcing, connection verification, dynamic real-time monitoring, and re-validation frequency of user locations

**RESPONSE:** The commission may consider adding additional requirements in the future to allow industry to comment on the proposed rules. Re-validation frequency is addressed in section (2). This rule also addresses efforts by patrons to circumvent the location detection mechanisms. No

changes have been made to the rule as a result of this comment.

COMMENT #5: Section (8) – Cory Fox, with FanDuel, suggested revising the language to revise “immediately” to “promptly” or to remove “immediately” to relieve restrictive timelines on licensees.

RESPONSE: The word “promptly” is too subjective. No changes have been made to the rule as a result of this comment.

## **11 CSR 45-20.270 Online Sports Wagering Platform Requirements**

(1) A Mobile licensee conducting sports wagering over the internet shall use a single online sports wagering platform, all the integral components of which have been tested, certified, and approved, pursuant to 11 CSR 45-20.240.

(6) Each Mobile licensee shall maintain modern best practices to ensure the security and integrity of the online sports wagering platform, including, but not limited to:

- (A) Network security;
- (B) Patron identity authentication;
- (C) Location detection;
- (D) Error detection; and
- (E) Data security.

(7) If a Mobile licensee becomes aware of a reproducible error in the online sports wagering platform that relates to network security, data security, location detection, or otherwise calls into question the security and integrity of the online sports wagering platform, the licensee shall notify the commission immediately. The notification shall include:

**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 45-20.280 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 808–809). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received three (3) written comments on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Section (1) – Jeremiah Weinstock, a Missouri constituent, suggested revising the language to require a responsible gaming message be displayed.

**RESPONSE:** The commission considers the required statement “regarding how a patron can obtain assistance with a gambling problem” sufficient. No changes have been made to the rule as a result of this comment.

**COMMENT #2:** Section (2) – Michael Daley, a Missouri constituent, suggested revising the language to revise fourteen (14) days to one hundred eighty (180) days as it is burdensome on the patron to require multi-factor authentication every fourteen (14) days.

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised to thirty (30) days, which is consistent with Gaming Laboratories International (GLI) Standard 33.

**COMMENT #3:** Subsection (3)(A) – Cory Fox, with FanDuel, suggested revising the language to remove “phone number” as this is not how they provide customer service.

**RESPONSE:** The commission considers a phone number option standard customer service for Missouri patrons. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Subsection (3)(B) – The Joint Committee on Administrative Rules suggested revising as the language was too broad.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.280 Client Requirements**

(2) The client shall require multi-factor authentication when a patron logs in to his or her online sports wagering account through a specific device for the first time and every thirty (30) days thereafter.

(3) Client software shall give a patron prominent and convenient access to a support page, screen, menu, or equivalent, which at a minimum contains access to the following:

(B) Complete explanation of all house rules;

**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 45-20.290 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 809–810). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received three (3) written comments on the proposed rule. Commission staff made two (2) comments on the proposed rule.

**COMMENT #1:** Section (2) – A staff member suggested removing the language “at no cost to the commission” as it is unnecessary.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (5) – A staff member suggested revising the language to allow backup servers to be located outside of Missouri but within the United States.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Sections (10) and (12) – Cory Fox, with FanDuel, suggested revising the language to revise “immediately” to “promptly” or to remove “immediately” to relieve restrictive timelines on licensees.

**RESPONSE:** The word “promptly” is too subjective. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Sections (12) and (13) – Adam Kates, with PENN Entertainment, suggested revising the language to state “twenty-four (24) business hours” to provide adequate time to collect all appropriate information from the issue.

**RESPONSE:** Business hours is an unclear standard and could vary within the industry. No changes have been made to the rule as a result of this comment.

**COMMENT #5:** Section (13) – Cory Fox, with FanDuel, suggested to remove the language “no later than the end of the following calendar day” to relieve the burden on the licensees.

**RESPONSE:** The notification needs to be made within the specified timeframe. No changes have been made to the rule as a result of this comment.

## **11 CSR 45-20.290 Sports Wagering System Requirements**

(2) Each Retail or Mobile licensee shall provide the commission remote, read only, real-time access to the sports wagering system. That access shall include, at a minimum:

(5) All servers used to receive transmissions of requests to place wagers and that transmit confirmation of acceptance of wagers on events placed by patrons shall be physically located in the state of Missouri. Licensees shall provide the commission with the physical location of such servers. Backup servers may be located outside of Missouri, but within the United States. Any data center where a sports wagering system server is housed must be secure and have access controls in place to prevent unauthorized access to the sports wagering system server or other equipment.

**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 45-20.300 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 810–811). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Subsection (2)(E) – The Joint Committee on Administrative Rules suggested revising as the language was too broad.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Private Cost Statement – A staff member suggested revising the fiscal note for the number of companies anticipated to obtain Retail and Mobile licenses and to consistently reflect the hourly rate for integrity and security assessment testing.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.300 Integrity and Security Assessment**

(2) The scope of the assessment shall include, at a minimum, the following:

(E) Any other specific criteria or standards for the integrity and security assessment that align with industry best practices as requested by the commission to ensure the integrity of the sports wagering operation.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of \$1,000,000 versus the estimated annual cost of \$1,160,000, 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**

<b>Rule number/name:</b>	11 CSR 45-20.300 Integrity and Security Assessment
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
11	Retail licensees	\$440,000.00
14	Mobile licensees	\$560,000.00

**III. WORKSHEET**

<b>Annual Estimates</b>	
Retail licensees (11 licensees x 200 hours x \$200 per hour)	\$440,000.00
Mobile licensees (14 licensees x 200 hours x \$200 per hour)	\$560,000.00
<b>TOTAL</b>	<b>\$1,000,000.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casino sportsbooks and 2 sports teams sportsbooks)  
14 Mobile licensees (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses)  
The hourly rate for integrity and security assessment testing services is \$200.

**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 45-20.310 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 812–813). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received six (6) written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule.

**COMMENT #1:** Section (4) – Rebecca London, with DraftKings, suggested revising the language to the substantial change provision to provide additional regulatory certainty and an extra layer of flexibility in the event a change to a licensee’s sports wagering system is isolated to the state of Missouri. She also suggested revising the language to add that “a substantial change shall include core system software changes that amount to a new version of the sports wagering system and shall not include routine, customary software adjustments that do not significantly affect the sports wagering patron experience or system compliance controls.”

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised subsection (1)(A) to clarify that it applies to sports wagering systems in Missouri. Section (1) defines core function and what is considered a substantial change, therefore the suggested language was not added.

**COMMENT #2:** Section (5) – Cory Fox, with FanDuel, suggested removing the language “by the end of the following calendar day” or revising it to state, “the next business day.”

**RESPONSE:** This industry operates 24 hours a day, 7 days a week; therefore, it is important for the notification of these incidents to be reported within the specified timeframe. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Sections (5) and (6) – Adam Kates, with PENN Entertainment, suggested revising the language to state “twenty-four (24) business hours” to provide adequate time to collect all appropriate information from the issue.

**RESPONSE:** Business hours is an unclear standard and could vary within the industry. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Section (6) – Cory Fox, with FanDuel, suggested revising the language to revise

“immediately” to “promptly” or to remove “immediately” to relieve restrictive timelines on licensees.

RESPONSE: The word “promptly” is too subjective. No changes have been made to the rule as a result of this comment.

COMMENT #5: Section (6) – Rebecca London, with DraftKings, suggested revising the timeline from “immediately” to within “twenty-four (24) hours” to align with industry standards.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #6: Subsection (7)(B) – Rebecca London, with DraftKings, suggested removing “requestor” from the requirement as this is not logged information and is not required under the Gaming Laboratories International (GLI) Standard 33.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #7: Private Cost Statement – A staff member suggested revising the fiscal note to clarify the number of Retail licensees affected and revised the assumptions to address the number of systems used by the licensees.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the fiscal note.

## **11 CSR 45-20.310 Software Change Management**

(1) As used in this rule, the following terms shall have the following meaning:

(A) A core function is any function related to the placement, recording, and resolution of wagers, or any other function or feature that affects the security, integrity, availability, or recordkeeping of the sports wagering system in Missouri.

(6) Emergency changes shall be documented in the change log and the Retail or Mobile licensee shall notify the commission in writing within twenty-four (24) hours upon implementation of any emergency changes. The notification to the commission shall include the information documented on the change log. Upon review of the change, the commission may order the change be tested, certified, and approved.

(7) The change log shall—

(B) Include the date of change, summary of change, implementer, and results of the change; and

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of \$1,033,600 versus the estimated annual cost of \$1,060,000, 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**

<b>Rule number/name:</b>	11 CSR 45-20.310 Software Change Management
<b>Type of rulemaking:</b>	Final Order of Rulemaking for a Proposed Rule with Changes

**II. SUMMARY OF FISCAL IMPACT**

Estimate of the number of entities by class that would likely be affected by adoption of the rule:	Classification by type(s) of the business entities that would likely be affected by adoption of the rule:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
11	Retail licenses	\$81,600.00
14	Mobile licensees	\$952,000.00

**III. WORKSHEET**

<b>Annual Estimates</b>	
Retail licensees (2 changes annually that require testing x 6 systems x 40 hours x \$170 per hour)	\$81,600.00
Mobile licensees (10 changes annually that require testing x 14 systems x 40 hours x \$170 per hour)	\$952,000.00
<b>TOTAL</b>	<b>\$1,033,600.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees will utilize 6 different sports wagering systems. (4 common sports wagering systems will be utilized by 9 casinos and 2 sports wagering systems will be utilized by 2 sports teams.)

14 Mobile licensees will each utilize a different sports wagering system. (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses.)

The hourly rate for an independent testing laboratory (ITL) is \$170.

It will take 40 hours to test each system.

Retail licensees will have 2 changes to the software each year that will require testing.

Mobile licensees will have 10 changes to the software each year that will require testing.

**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 45-20.320 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 814–815). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received fifteen (15) written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Paragraph (3)(A)9. – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language to remove “including the document number of the state or federal government-issued identification credential examined and its date of expiration and the electronic record documenting the process used to confirm the patron’s identity.”

**RESPONSE:** The requirement to provide a federal or state issued ID is another measure to provide accurate identification of the patron. No changes have been made to the rule as a result of this comment.

**COMMENT #2:** Paragraph (3)(A)10. – Rebecca London, with DraftKings, suggested removing this in its entirety.

**RESPONSE:** This requirement is consistent with other jurisdictions. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Subsection (3)(C) – The Joint Committee on Administrative Rules suggested revising as the language was too broad.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Subsection (3)(C) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language to say “or” instead of “and.”

**RESPONSE:** The requirement to provide a federal or state issued ID is another measure to provide accurate identification of the patron. No changes have been made to the rule as a result of this comment.

COMMENT #5: Subsection (3)(D) – The Joint Committee on Administrative Rules suggested revising as the language was too broad.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #6: Subsection (3)(D) – Michael Daley, a Missouri constituent, suggested revising the language to change fourteen (14) days to one hundred eighty (180) days as it is burdensome on the patron. Additionally, he suggested adding the following language, “Following successful login with multi-factor authentication, the patron may remain logged-in for 24 hours on the same device without requiring re-authentication with the account password. A patron may remain logged in at the same time on multiple devices (such as a mobile telephone, a tablet, or a computer) that have been authenticated via multi-factor authentication provided the devices appear to be located in the same geographical location. The Mobile licensee shall require a patron establish a strong password consisting of 14 or more characters including a combination of upper and lower case letters, at least one numeral, and at least one special character. The account password will not expire, however a Mobile Licensee may use its discretion to require a patron to change the account password when needed to protect patron accounts.”

RESPONSE AND EXPLANATION OF CHANGE: Partially agreed and revised to thirty (30) days, which is consistent with Gaming Laboratories International (GLI) Standard 33. The commission is not adding the suggested language as 11 CSR 45-20.240 requires all sports wagering equipment and systems to be tested for compliance with technical standards, such as GLI Standard 33, which address some of the suggested additional requirements.

COMMENT #7: Section (4) – The Joint Committee on Administrative Rules suggested revising as the language implied that a patron would be limited to one online sports wagering account.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #8: Section (6) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language to add the following:

“(I) Deposit of United States currency at a location approved by the Commission;

(J) Online and mobile payment systems that support online money transfers;

(K) Cryptocurrencies; or

(L) Any other means in the approved internal control system, or as otherwise approved by the Missouri Gaming Commission.”

RESPONSE AND EXPLANATION OF CHANGE: Partially agreed and revised subsection (6)(E) instead of adding the suggested subsection (6)(J). The other suggested subsection additions were not included at this time.

COMMENT #9: Subsection (6)(A) – Jeremiah Weinstock, a Missouri constituent, suggested revising the language to not allow funding an online sports wagering account with a credit card.

RESPONSE: Article III, Section 39(g), of the *Missouri Constitution* includes credit cards as a funding source for sports wagering. No changes have been made to the rule as a result of this comment.

COMMENT #10: Section (6) – Adam Kates, with PENN Entertainment, suggested revising the language to allow patrons to fund their accounts with cash at a partnered brick and mortar casino.

RESPONSE: These transactions would occur at separate licensees, as the Retail licensee is

separate from the Mobile licensee. No changes have been made to the rule as a result of this comment.

COMMENT #11: Section (8) – Adam Kates, with PENN Entertainment, suggested revising the language to allow patrons to withdraw funds from their accounts at a partnered brick and mortar casino.

RESPONSE: These transactions would occur at separate licensees, as the Retail licensee is separate from the Mobile licensee. No changes have been made to the rule as a result of this comment.

COMMENT #12: Subsection (8)(E) – A staff member suggested revising the language to be consistent with a revision made to subsection (6)(E).

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #13: Section (9) – Daniel Mulhall, with Fanatics Betting and Gaming, and Adam Kates, with PENN Entertainment, suggested removing this provision in its entirety as this proposed rule is overly restrictive and presents technical implementation challenges.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and removed. As a result, “credit card” was added to subsection (8)(B). Renumbered the remaining sections.

COMMENT #14: Section (12) – Adam Kates, with PENN Entertainment, suggested revising the language to require a monthly review instead of a weekly review to align with industry standards.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #15: Section (13) – Daniel Rainieri, with BetMGM, suggested revising the language to remove “no later than twenty-four (24) hours.”

RESPONSE AND EXPLANATION OF CHANGE: Partially agreed and revised to state five (5) calendar days.

COMMENT #16: Section (13) – Jeremiah Weinstock, a Missouri constituent, suggested revising the language to include information about low-risk gambling limits and whether an individual has exceeded this threshold with their average monthly gambling behavior.

RESPONSE: Section (13) requires the responsible gaming limit history. No changes have been made to the rule as a result of this comment.

COMMENT #17: Subsection (15)(A) – Michael Daley, a Missouri constituent, suggested revising the language to revise the five-day window for patron withdrawal to “within one business day.”

RESPONSE: This requirement is consistent with other jurisdictions. No changes have been made to the rule as a result of this comment.

COMMENT #18: Section (16) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the current language to clarify operators must only contact an account holder once and then wait one hundred twenty (120) days before declaring the funds abandoned.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

## **11 CSR 45-20.320 Online Sports Wagering Accounts**

(3) In order to establish an online sports wagering account, a Mobile licensee shall—

(C) Verify the patron's identity using a methodology as described in the licensee's internal control system. The methodology shall include remote multi-sourced authentication, which may include third-party or governmental databases, and examining the patron's valid, non-expired state or federal government-issued photo identification credential;

(D) Require the patron to establish a password or other access security feature to control access to the account. A Mobile licensee shall also utilize multi-factor authentication for each new device. After a successful login with multi-factor authentication for a specific device, a patron is not required to utilize multi-factor authentication to access his or her online sports wagering account from that device for a period of thirty (30) days. A patron shall have the ability to always require multi-factor authentication;

(4) The Mobile licensee shall use commercially reasonable means to ensure that each patron has only one (1) online sports wagering account with that Mobile licensee. An online sports wagering account shall be—

(6) An online sports wagering account may only be funded through the following methods as approved in the licensee's internal control system:

(E) Online and mobile payments through a money transmitter licensed under the Money Transmission Modernization Act (MTMA), sections 361.900 to 361.1035, RSMo;

(8) Funds may be withdrawn or removed from an online sports wagering account for the following:

(B) Credits to the patron's credit or debit card;

(E) Online and mobile withdrawals through a money transmitter licensed under the Money Transmission Modernization Act (MTMA), sections 361.900 to 361.1035, RSMo;

(9) Upon any deposit, withdrawal, or adjustment, the licensee shall send a confirmation email to the patron's registered address and shall provide a means through which a patron may contest any transaction.

(10) Adjustments shall only be made by individuals in job positions as specified in the internal control system. Adjustments shall only be made—

(11) All adjustments under five hundred dollars (\$500) shall be reviewed at least monthly by supervisory personnel as set forth in the internal control system. All adjustments of five hundred dollars (\$500) or more shall be authorized by supervisory personnel prior to being entered.

(12) The online sports wagering platform shall provide a summary statement on demand of the patron's activity during at least the prior six (6) months. When a statement is requested, it shall be transmitted no later than five (5) calendar days after the request is made and an online sports wagering platform shall be capable of providing a summary statement of all authorized participant activity during the past two (2) years. The statement shall include, at a minimum—

(13) A licensee shall reverify a patron's identification any time there is reasonable suspicion that the patron's identification has been compromised.

(14) A patron shall be allowed to withdraw the funds maintained in his or her online sports wagering account.

(15) The Mobile licensee shall consider an online sports wagering account to be dormant if the patron has not logged into the account for at least five (5) years. A dormant account shall be closed by the licensee. Upon closure of a dormant account, the licensee shall make reasonable efforts to contact the account holder to return any unclaimed funds. One hundred twenty (120) days after attempting to contact the account holder, the unclaimed funds in a dormant account shall be presumed abandoned. Licensees shall remit all abandoned funds in accordance with the “Missouri Uniform Disposition of Unclaimed Property Act,” section 447.500 et seq., RSMo.

(16) An online sports wagering platform shall provide a conspicuous and readily accessible method for a patron to temporarily suspend or close his or her online sports wagering account. Any remaining balance in the online sports wagering account shall be refunded within five (5) business days of the request, unless the licensee believes in good faith that the patron engaged in either fraudulent or prohibited conduct. If a patron has suspended his or her account, the licensee shall not send gaming-related electronic mail to such patron while the account is suspended.

(17) Mobile licensees shall establish test accounts for the commission to be used to test the various components and operations of the sports wagering system.

**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 45-20.330 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 816). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received three (3) written comments on the proposed rule. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Craig Williams, a member of the general public, suggested amending this rule to require investigations to conclude within ninety (90) days of the day the account is suspended and if it is not, the patron shall be given the right to withdraw the funds from the account.

**RESPONSE:** The operator's terms and conditions will address the funds held in a suspended account. No changes have been made to the rule as a result of this comment.

**COMMENT #2:** Subsection (2)(A) – The Joint Committee on Administrative Rules suggested revising as the language gave the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and removed. Renumbered remaining subsections.

**COMMENT #3:** Section (3) – Rebecca London, with DraftKings, suggested revising the language to not require accounts be permanently suspended after five (5) additional consecutive failed ACH deposit attempts within a ten (10) minute period. She also suggested revising the language to state, "...the licensee shall suspend the patron's account, pending patron actions for reinstatement."

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Subsection (4)(E) – Cory Fox, with FanDuel, suggested revising the current language to state, "Prevent the removal of the online sports wagering account from the online sports wagering platform."

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #5:** Subsection (5)(A) – The Joint Committee on Administrative Rules suggested revising as the language gave the commission broad authority.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #6: Subsections (5)(D) and (5)(E) – The Joint Committee on Administrative Rules suggested revising as the language was unclear as to what happens to the patron's funds in an account that remains suspended.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and added a new section (6) that addresses funds remaining in a suspended account.

## **11 CSR 45-20.330 Online Sports Wagering Account Suspension**

(2) An online sports wagering account shall be suspended by a Mobile licensee—

(A) Upon determination that a patron is prohibited from placing any wagers with that Mobile licensee pursuant to 11 CSR 45-20.360;

(B) When a patron owes funds to the Mobile licensee;

(C) When a Mobile licensee has suspicion of illegal activity or suspicious wagering activity; and

(D) When a Mobile licensee is conducting a responsible gaming investigation based on information obtained by the licensee.

(3) After five (5) consecutive failed ACH deposit attempts within a ten- (10-) minute time period the licensee shall temporarily suspend the patron's account for a fraud investigation. If there is no evidence of fraud, the suspension may be lifted. After five (5) additional consecutive failed ACH deposit attempts within a ten- (10-) minute period, the licensee shall suspend the patron's account, pending patron actions for reinstatement.

(4) When an online sports wagering account is suspended, the online sports wagering platform shall—

(E) Prevent the removal of the online sports wagering account from the online sports wagering platform;

(5) A suspension may only be lifted—

(A) By order of the commission after appropriate investigation into the reason for the suspension;

(6) If a suspension is not lifted, the funds in the patron's account shall be handled in accordance with the Mobile licensee's terms and conditions.

**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 45-20.340 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 816–817). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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:** Sections (1), (2), and (5) – A staff member suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Catherine Snowden, with Kambi, suggested adding SW Supplier to the purpose statement so that SW Supplier licensees can also submit a request to the commission to permit wagering on other specific athletic, sporting, and other competitive events and awards involving human participants that are not already approved by the commission. As an SW Supplier, she said they are required to make the necessary technical changes for any new approved wagering to provide the odds to Retail and Mobile licensees.

**RESPONSE:** Retail and Mobile licensees, as the parties offering the events to be wagered upon, must submit the request for the events that they wish to offer. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (2) – Craig Williams, a member of the general public, suggested revising the language to allow patrons to submit a request to the commission to permit wagering on other specific athletic, sporting, and other competitive events and awards involving human participants that are not already approved by the commission.

**RESPONSE:** Retail and Mobile licensees, as the parties offering the events to be wagered upon, must submit the request that they wish to offer. No changes have been made to the rule as a result of this comment.

**11 CSR 45-20.340 Requests to Authorize Events and Competitions**

(1) Retail licensees and Mobile licensees may only accept wagers on events approved by the commission and published in the catalog of approved events.

(2) Retail licensees and Mobile licensees may submit to the commission in writing a request to permit wagering on other specific athletic, sporting, and other competitive events and awards involving human participants that are not already approved by the commission.

(5) Upon approval of a request, the commission shall notify all Retail licensees and Mobile licensees of the approval and any licensee may offer wagering on the requested sport, event, league, or competition.

**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 45-20.350 Requests to Restrict and Exclude Wagering is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 817–818). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule.

**COMMENT #1:** Section (2) – Jeremiah Weinstock, a Missouri constituent, suggested revising the language to allow the public a direct mechanism to note when a type of wagering is contrary to public policy and submit a request to restrict, limit, or exclude a certain type, form, or category of wagering.

**RESPONSE:** The public can express their concern(s) about a type, form, or category of wagering by notifying the commission and the executive director has the authority to recommend restricting, limiting, or excluding a certain type, form, or category of wagering. 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 45-20.360 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 818). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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:** Sections (1) through (8) – A staff member suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Subsection (2)(B) – Craig Williams, a member of the general public, and Michael Daley, a Missouri constituent, suggested removal of this subsection.

**RESPONSE:** This is a requirement in Article III, Section 39(g), of the *Missouri Constitution*. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (7) – A staff member suggested revising the language to clarify the notification shall be in writing.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.360 Prohibited Wagering Activity**

(1) Retail licensees and Mobile licensees shall comply with the following regarding prohibited wagering activity:

(2) Retail licensees and Mobile licensees shall not allow wagering on—

(3) Retail licensees and Mobile licensees shall not accept or redeem a prohibited wager or a wager from a prohibited person.

(4) Retail licensees and Mobile licensees shall not accept a wager from a partnership, a corporation, an association, or any other entity that is not an individual.

(5) Retail licensees and Mobile licensees shall not offer any specialized wagering propositions or set or move its wagering odds, lines, or limits in an attempt to provide a benefit to a patron, unless as part of a sports wagering promotion conducted by the licensee in accordance with the promotional rules.

(6) Retail licensees and Mobile licensees have an affirmative duty to actively prevent the placement of a wager by individuals under twenty-one (21) years of age, on the SEP List, or on the MGC Excluded Persons List. Licensees have an affirmative duty to actively prevent the redemption of a wager by individuals under twenty-one (21) years of age or any wager that was placed by an individual who was on the SEP List or MGC Excluded Persons List at the time of the wager.

(7) If a Retail licensee or Mobile licensee discovers it has accepted a prohibited wager, it shall notify the commission in writing within twenty-four (24) hours of the discovery.

(8) Any wager that was prohibited at the time it was made shall be deemed void and the amount of the wager shall be refunded by the Retail licensee or Mobile licensee and deducted from adjusted gross revenue. If the voided wager is not refunded prior to the expiration date of the ticket, the amount of the wager shall be remitted to the Gaming Commission Fund and deducted from adjusted gross revenue. If there are any winnings from the voided wager, the winnings shall be nullified.

**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 45-20.370 Personal Biometric Data Prohibition is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 818–819). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written 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 45-20.380 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 819–821). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Section (1) – The Joint Committee on Administrative Rules suggest revising a portion of the language as it is unnecessary.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (6) – Daniel Rainieri, with BetMGM, suggested revising “calendar days” to “business days” to align with industry standards.

**RESPONSE:** Given that this industry operates 24 hours a day, using “business days” may not be clear to all parties while “calendar days” is clear. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (6) – Cory Fox, with FanDuel, suggested revising “fifteen (15) calendar days” to “thirty (30) calendar days.”

**RESPONSE:** Fifteen (15) calendar days is consistent with current commission procedures regarding internal control deficiencies. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Private Cost Statement – A staff member suggested revising the fiscal note to reflect the new anticipated number of Retail licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised the fiscal note to change the number of Retail licensees.

**11 CSR 45-20.380 Internal Control System**

(1) Each Retail and Mobile licensee shall establish, maintain, and update a written internal control system that includes the following:

*REVISED PRIVATE COST: The cost to private entities is an estimated initial cost of ninety-nine thousand eight hundred forty dollars (\$99,840) and an annual cost of forty-nine thousand nine hundred twenty dollars (\$49,920) versus the estimated initial cost of one hundred nineteen thousand forty dollars (\$119,040) and an annual cost of fifty-nine thousand five hundred twenty dollars (\$59,520), 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.380 Internal Control System
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$79,200.00
14	Mobile Licensees	\$70,560.00

**III. WORKSHEET**

Retail (11 licensees X 160 hours X \$30 per hour) for initial year	\$52,800.00
Mobile (14 licensees X 112 hours X \$30 per hour) for initial year	\$47,040.00
Retail (11 licensees X 80 hours X \$30 per hour) for each subsequent year	\$26,400.00
Mobile (14 licensees X 56 hours X \$30 per hour) for each subsequent year	\$23,520.00
<b>TOTAL</b>	<b>\$149,760.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams)

14 Mobile licensees (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses)

Number of labor hours for a Retail licensee to maintain and submit internal controls during the first year of operation is 160 hours and 80 hours every subsequent year.

Number of labor hours for a Mobile licensee to maintain and submit internal controls during the first year of operation is 112 hours and 56 hours every subsequent year.

Mobile licensees have 30% less internal control requirements than Retail licensees.

The labor cost per hour is \$30 per hour.

**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 45-20.390 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 822–823). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Section (1) – A staff member suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Subparagraph (1)(C)6.C. – Cory Fox, with FanDuel, suggested revising the current language to add “online and mobile payment system that support online money transfer.”

**RESPONSE:** This rule only applies to retail locations. Article III, Section 39(g), of the *Missouri Constitution* only provides for online and mobile payments to be used to fund online wagering accounts. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Subsection (1)(D) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.390 Internal Control System Requirements**

(1) The internal control system shall include a detailed narrative description of the Retail or Mobile licensee's sports wagering, administrative, and accounting procedures, including without limitation, separate sections comprehensively describing the specific procedures that the licensee will follow in meeting the requirements of this chapter. The internal control system shall include at a minimum the following topics:

(D) Other items the commission may require to ensure the security and integrity of the sports wagering operation.

**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 45-20.400 Forms is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 823–824). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written 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 45-20.410 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 824–825). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received four (4) written comments on the proposed rule. Commission staff made two (2) comments on the proposed rule.

**COMMENT #1:** Sections (1)-(3) and (6)-(7) – A staff member suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (6) – Craig Williams, a member of the general public, suggested revising the language to include a requirement for operators to include in the house rules a description of wagering activity that would result in account suspension or wagering limitations.

**RESPONSE:** The commission may consider adding this requirement in the future. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Subsection (6)(K) – Rebecca London, with DraftKings, suggested revising the language to state, “A definition of prohibited wagering participants” instead of “prohibited wagering activity” to provide consistency between regulatory definitions and operator-specific rules.

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised. The commission added a “description of individuals prohibited from wagering” and retained “prohibited wagering activity” because not all prohibited wagering activity is related to prohibited persons.

**COMMENT #4:** Paragraph (6)(L)1. – Daniel Rainieri, with BetMGM, suggested revising “calendar days” to “business days” to align with industry standards.

**RESPONSE:** Given that this industry operates 24 hours a day, using “business days” may not be clear to all parties while “calendar days” is clear. No changes have been made to the rule as a result of this comment.

COMMENT #5: Subsection (6)(M) – Rebecca London, with DraftKings, suggested removing this subsection as it is the operator’s responsibility to monitor, investigate, and report such activity in accordance with regulatory requirements.

RESPONSE: The house rules need to include instructions on how to report prohibited conduct, criminal behavior, and violations to the commission in the instance that a patron knows of such occurrence. No changes have been made to the rule as a result of this comment.

COMMENT #6: Private Cost Statement – A staff member suggested revising the fiscal note to reflect the new anticipated number of Retail licensees and to reflect projected annual costs.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the fiscal note to change the number of Retail licensees and to reflect projected annual costs.

## **11 CSR 45-20.410 House Rules**

(1) Each Retail licensee and Mobile licensee shall establish and maintain house rules and shall conduct sports wagering in accordance with its house rules.

(2) Retail licensees and Mobile licensees shall not include any content in the house rules that are inconsistent with the approved internal controls or any existing regulations.

(3) Retail licensees and Mobile licensees shall provide upon request a copy of its house rules to any patron or the commission.

(6) The house rules shall include, but not be limited to:

(F) Procedures for patrons to redeem winning tickets by mail, if permitted by the Retail licensee;

(I) A list of all forms of payment the Retail licensee or Mobile licensee accepts for placement of wagers;

(K) A description of individuals prohibited from wagering and prohibited wagering activities;

(L) A description of means by which a patron may submit a complaint to the Retail licensee or Mobile licensee, including—

(7) Each Retail licensee and Mobile licensee shall submit a copy of its house rules and any subsequent revisions to its house rules to the commission for approval. Any house rules or amendments thereto shall be approved by the commission prior to implementation.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of fifteen thousand dollars (\$15,000) versus the estimated cost of seventeen thousand four hundred dollars (\$17,400) in the aggregate, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.410 House Rules
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$6,600.00
14	Mobile Licensees	\$8,400.00

**III. WORKSHEET**

Retail (11 licensees X 20 hours X \$30 per hour)	\$6,600.00
Mobile (14 licensees X 20 hours X \$30 per hour)	\$8,400.00
<b>TOTAL</b>	<b>\$15,000.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams)  
14 Mobile licensees (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses)  
Number of labor hours for a Retail licensee to submit house rules is 20 hours.  
Number of labor hours for a Mobile licensee to submit house rules is 20 hours.  
The labor cost per hour is \$30 per hour.

**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 45-20.420 Tier One and Tier Two Wagering is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 826). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule.

COMMENT #1: Section (2) – Craig Williams, a member of the general public, suggested revising the current language to remove, “If a sports governing body, headquartered in the United States, does not notify the commission of its desire to supply official league data.”

RESPONSE: This language is in Article III, Section 39(g), of the *Missouri Constitution*. 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 45-20.430 Official League Data is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 826–827). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written 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 45-20.440 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 827–828). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

COMMENT #1: Section (4) – The Joint Committee on Administrative Rules suggested revising the language to use the correct pronoun.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

**11 CSR 45-20.440 Commercial Reasonableness**

(4) If the commission determines that a petition does not meet all requirements, that petition shall be rejected and it shall notify both parties.

**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 45-20.450 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 828). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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:** Sections (1)-(5), (8)-(10), and (12)-(13) – A staff member suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (4) – Craig Williams, a member of the general public, suggested revising the language to clarify that licensees should accept wagers unless there is a problem with the account or the patron has violated the terms and conditions with wager types that have led to account action, such as limiting.

**RESPONSE:** There are many legitimate reasons why operators would not accept a wager. These reasons would be included in the terms and conditions and house rules. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (4) – Craig Williams, a member of the general public, suggested revising the language to require licensees to display the maximum bet amount a patron may wager for that specific wager in the bet slip prior to submission.

**RESPONSE:** Prior industry feedback suggested that having to publish fixed maximum wagers in the house rules would be difficult for operators. No changes have been made to the rule as a result of this comment.

**11 CSR 45-20.450 Placement of Wagers**

(1) Retail licensees and Mobile licensees shall not accept any wager of any type or kind, unless the type or kind of wager and subject of the wager has been approved by the commission.

(2) Retail licensees and Mobile licensees shall not knowingly accept wagers on any event for which the outcome has already been determined. If the licensee becomes aware that a wager was placed on an event where the outcome had already been determined, the licensee shall void and refund the wager.

(3) Retail licensees and Mobile licensees shall only accept wagers on events for which—

(4) Retail licensees and Mobile licensees shall always have the right to decline to accept any wager a patron attempts to place.

(5) Retail licenses and Mobile licensees shall only accept and record wagers in United States currency. Sources of currency accepted by a licensee shall be documented in its internal control system.

(8) Retail licensees and Mobile licensees shall not accept wagers if the sports wagering system is not available.

(9) Retail licensees and Mobile licensees shall implement methods and procedures to detect and document abnormal or suspicious wagering activity. Those methods and procedures shall be documented in the internal control system.

(10) Retail licensees and Mobile licensees shall not offer a loan, credit, or advancement of anything of value to any person to take part in sports wagering either directly or through a third-party.

(12) Employees or key persons of any Retail, Mobile, SW Supplier, or Official League Data Provider licensee shall not advise or encourage an individual patron to place a specific wager of any specific type, kind, subject, or amount. This restriction does not prohibit general advertising or promotional activities.

(13) Retail licensees and Mobile licensees shall not hold a patron's funds on the understanding that the licensee will accept the funds as a wager only upon the occurrence of a specified, future contingency.

**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 45-20.460 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 829). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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: Private Cost Statement** – A staff member suggested adding a fiscal note to account for the cost of employees needed to operate a sportsbook.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and added a fiscal note to account for the cost of Retail licensees employing at least three (3) sportsbook employees.

**11 CSR 45-20.460 Redemption of Wagers**

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of \$1,815,000 versus the estimated cost of less than five hundred dollars (\$500) in the aggregate, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.460 Redemption of Wagers
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$1,815,000.00

**III. WORKSHEET**

Retail Licensees (11 licensees x 3 employees x \$55,000 annually)	\$1,815,000.00
<b>TOTAL</b>	<b>\$1,815,000.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams) will need to operate a sportsbook cage 8 hours a day, 5 days a week.  
Retail licensees will need to employ at least 3 sportsbook employees.  
The cost to employ a sportsbook employee is \$55,000 annually.

**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 45-20.470 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 829–830). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received five (5) written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Sections (1)-(3), (6)-(7), (10)-(11), (14), and (17) – A staff member suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Subsection (2)(D) – Rebecca London, with DraftKings, suggested revising the current language to state, “An error occurs” instead of “A material change in circumstances occurs.” She stated this change would provide greater clarity and cross-jurisdictional regulatory alignment.

**RESPONSE:** Section (10) addresses errors. Additionally, the language in this rule is consistent with at least one other jurisdiction. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Paragraph (2)(D)1. – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Subsection (3)(C) – Rebecca London, with DraftKings, suggested removing the language in this subsection because it is overly restrictive and may not reflect the full scope of legitimate, justifiable reasons for cancellation.

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised to remove the requirement that the explanation include why cancelling the wager is in the best interest of the state of Missouri.

**COMMENT #5:** Sections (10) and (11) – Daniel Mulhall, with Fanatics Betting and Gaming,

suggested revising the language in section (10) to include that wagers may be voided if the wager was placed with incorrect odds and removing section (11) in its entirety.

RESPONSE: An operator may obtain approval from the commission to void a wager solely because of incorrect odds, in accordance with section (11). No changes have been made to the rule as a result of this comment.

COMMENT #6: Section (13) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested removing this section in its entirety as it introduces additional parties to this process which may result in delayed void processing.

RESPONSE: This creates a proper segregation of duties. No changes have been made to the rule as a result of this comment.

COMMENT #7: Section (16) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested removing the requirement for a supervisor or compliance employee independent of the initial transaction to log the voided transaction.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

## **11 CSR 45-20.470 Cancelled and Voided Wagers**

(1) Retail licensees and Mobile licensees shall not cancel any wager except in accordance with this rule.

(2) Cancellation by a Retail licensee or Mobile licensee of an otherwise validly placed wager shall be nondiscretionary. A licensee shall only cancel a wager under the following circumstances:

(D) A material change in circumstances occurs.

1. What constitutes a material change in circumstances for a given event or wager type shall be documented in the internal control system.

2. What constitutes a material change in circumstances shall be clearly and prominently displayed to a patron at the time of placement of the wager;

(3) Retail licensees and Mobile licensees may request the commission to order the cancellation of all wagers of a specific type, kind, or subject not otherwise identified in section (2). A request to cancel shall be in writing, and contain the following:

(C) An explanation why cancelling the wagers ensures the integrity of the Missouri sports wagering industry.

(6) If the commission approves the request to cancel, the Retail licensee or Mobile licensee shall make commercially reasonable efforts to notify patrons of the cancellation.

(7) The commission has discretion to order all Retail licensees and Mobile licensees to cancel all wagers on a specific event or wagers of a specific type or kind on a specific event.

(10) A Retail licensee or Mobile licensee may declare a wager to be void if the licensee has reasonable basis to believe there was obvious error in the placement or acceptance of the wager. Those errors include, but are not limited to:

(11) Retail licensees and Mobile licensees shall not void a wager solely because the wager was placed with incorrect odds without prior approval of the commission.

(14) A wagerer may request that the commission review any wager declared void by a Retail licensee or Mobile licensee. If the commission concludes there is no reasonable basis to void the wager, the commission may order the licensee to honor the wager.

(16) All voided and cancelled wagers and all refunds of any such wagers shall be logged at the time they occurred.

(17) Retail licensees and Mobile licensees shall provide a monthly summary report of all cancelled, voided, and refunded wagers to the commission.

**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 45-20.480 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 830–833). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Section (8) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Sections (8)-(10) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the language to clarify that the voucher validation system may be integrated within the retail sports wagering system, as opposed to a separate system that resides at the sports wagering facility. Specifically, he suggested revising section (9) to state the database “may” reside at the Retail licensee’s facility instead of requiring it to be located at the facility.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised. Removed section (9) in its entirety. Renumbered the remaining sections.

**COMMENT #3:** Section (12) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the language to allow vouchers to expire one (1) year after the date of issuance.

**RESPONSE:** Vouchers are essentially the patron’s change from a transaction. They are not equivalent to tickets. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Section (25) – The Joint Committee on Administrative Rules suggested revising the language to make it consistent with 11 CSR 45-20.490 by adding “solid outer walls” and “no windows that can be opened.”

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #5:** Private Cost Statement – The Joint Committee on Administrative Rules suggested adding a fiscal note to account for the costs of constructing a vault and sportsbook cage and the

cost of employing security officers.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and added a fiscal note for the construction of a vault and sportsbook cage, as well as the employment of two security officers.

## **11 CSR 45-20.480 Retail Sports Wagering Locations and Operations**

(8) The Retail licensee shall ensure the voucher validation system in use at the licensee's facility utilizes an encryption algorithm with a minimum of a 128-bit key size, password protection, or another similarly secure method approved by the commission for files and directories containing critical or sensitive data. The voucher validation system may be integrated within the retail sports wagering system. The voucher validation system shall possess a non-alterable user audit trail. The licensee shall restrict users from viewing the contents of such files and directories, which at a minimum, shall provide for the following:

(9) The Retail licensee shall maintain a system manual that includes the following for the validation of vouchers:

(10) The sports wagering system shall be capable of recording the following information for each voucher:

(11) Vouchers shall not expire in the system and shall have no expiration date printed on them. Vouchers may, on their reverse, contain wording which indicates vouchers that cannot be validated may be considered void.

(12) The internal controls shall include procedures for when a kiosk is unable to print a voucher upon patron request.

(13) Patrons may redeem vouchers at ticket writer windows, wagering kiosks, or redemption kiosks for the specific amount of the voucher.

(14) Cash received by or paid out from a ticket writer window shall be spread on the counter in full view of the patron and within the dedicated surveillance coverage.

(15) The sports wagering system shall prevent a voucher from being redeemed more than once.

(16) A voucher shall only be redeemed the first time it is presented for redemption.

(17) All vouchers redeemed at a ticket writer window shall be forwarded to revenue audit on a daily basis.

(18) Once the validation information is stored in the database, the data may not be altered in any way. No job position shall have system access to view full validation numbers unless approved in the internal control system. Approved positions shall have a segregation of duties, ensuring those positions do not have the ability to redeem vouchers for cash. Any kiosk or system hardware on the kiosk that holds ticket information shall not have any options or methods that would allow for viewing of the full validation number prior to redemption.

(19) The Retail licensee shall maintain a record of “voucher liability” for vouchers that have been issued but not yet redeemed, which shall be stored in the system for not less than five (5) years from the date of issuance of the voucher, provided that—

(20) Vouchers shall not be manually added to the voucher validation system for any reason.

(21) Vouchers shall not be issued by employees.

(22) Each sportsbook cage shall be designed and constructed to provide maximum security for the materials stored and the activities performed therein. Such design and construction shall be approved by the commission.

(23) Each ticket writer station shall contain—

(24) Each Retail licensee shall have a secure location, known as the vault, for the purpose of storing funds to be used in the operation of a sportsbook. The vault shall—

(A) Be a fully enclosed room with solid outer walls and no windows that can be opened, located in an area not open to the public;

(25) All transactions with the vault shall be supported by documentation, except for even exchanges of currency of one hundred dollars (\$100) or less.

(26) All transfers of funds of more than five hundred dollars (\$500) shall be escorted by security and observed by surveillance.

(27) A sportsbook cage shall have an operating balance not to exceed an amount described in the internal controls. Funds in excess of the operating balance shall be transferred to the vault at the end of each shift in a secured, locked container by an employee of the sportsbook cage escorted by a security officer. Prior to transporting the funds, security shall notify surveillance that the transfer will take place. Surveillance shall monitor the transfer. The funds shall be transferred with appropriate documentation.

(28) At the end of each shift, the outgoing vault cashier shall count the vault inventory, record the inventory detail and the total inventory on a vault accountability form, and sign the form. The vault cashier shall also record the opening balance, the amount of each type of accountability transaction, the closing balance, and any variance between the counted inventory and the closing balance.

(29) The assets for which each ticket writer is responsible shall be maintained on an imprest basis. A ticket writer shall not permit any other person to access his or her imprest inventory. A ticket writer shall begin a shift with an imprest amount of currency and coin to be known as the sports wagering inventory. No funds shall be added to, or removed from, the sports wagering inventory during such shift, except—

(30) Retail licensees shall not accept or cash checks.

(31) A sports wagering count sheet shall be completed for the inventory issued to a ticket writer and signed by the sports wagering supervisor, and the following information, at a minimum, shall be recorded thereon at the commencement of a shift:

(32) A ticket writer assigned to a ticket writer station shall, at the beginning of his or her shift, count and verify the sports wagering inventory at the sports wagering vault or other approved location and shall agree the count to the sports wagering count sheet. The ticket writer shall sign the count sheet attesting to the accuracy of the information recorded thereon. The sports wagering inventory shall be placed in a secured ticket writer's drawer, transported directly to the appropriate ticket writer station by the ticket writer. The ticket writer's original sports wagering count sheet shall be placed in and remain in the ticket writer's drawer until the conclusion of the shift. The ticket writer's drawer shall be secured when the ticket writer is not present in the sportsbook.

(33) Whenever funds are transferred from the vault to a ticket writer, the vault cashier responsible for the vault shall prepare a two-part writer transfer-out form. Upon completion of the form, the duplicate shall be retained by the vault cashier and the original shall be retained by the ticket writer. The form shall include, at a minimum, the—

(34) Whenever funds are transferred from the ticket writer to a vault, a two-part writer transfer-in form shall be prepared. Upon completion of the form, the original shall be immediately transferred with the funds to the vault and the duplicate shall be retained by the ticket writer. The form shall include, at a minimum, the—

(35) At the conclusion of a ticket writer's shift, the content in the ticket writer's drawer shall be transported directly to the vault or to a location approved by the commission, where the ticket writer shall count the contents and record the following information, at a minimum, on the sports wagering count sheet:

(36) The sports wagering supervisor shall compare the ticket writer system closing balance to the sports wagering count total, record any over or short amount, and sign the sports wagering count sheet.

(37) If the sports wagering count sheet lists an overage or shortage, the ticket writer and the sports wagering supervisor shall attempt to determine the cause of the discrepancy in the count. If the discrepancy cannot be resolved, such discrepancy shall be reported to the surveillance department and the sports wagering manager or department supervisor in charge at such time. Any discrepancy in excess of five hundred dollars (\$500.00) shall be reported to the commission. The report shall include the following:

(38) The premises where any sports wagering or any sports wagering activity is being conducted shall be open for inspection by the commission.

*REVISED PRIVATE COST: The cost to private entities is an estimated initial cost of \$1,489,200 and an annual cost of \$1,320,000 versus the estimated cost of less than five hundred dollars (\$500) in the aggregate, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.480 Retail Sports Wagering Locations and Operations
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$2,809,200.00

**III. WORKSHEET**

Retail Licensees (11 licensees x \$35,000 construction cost for vault)	\$385,000.00
Retail Licensees (7 retail licensees x \$600 clear glass table in vault)	\$4,200.00
Retail Licensees (11 licensees x \$100,000 for sportsbook cage)	\$1,100,000.00
Retail Licensees (11 licensees x 2 security officers x \$60,000 annually)	\$1,320,000.00
<b>TOTAL</b>	<b>\$2,809,200.00</b>

**IV. ASSUMPTIONS**

11 Retail Sports Wagering Operators (9 casinos and 2 sports teams) will need to construct a vault. The estimated cost of constructing a vault is \$35,000.

7 Retail Sports Wagering Operators (2 sports teams and 5 operators partnered with casinos) will need to purchase a clear table in order to conduct the count in the vault. The estimated cost of the table is \$600.

11 Retail Sports Wagering Operators will need to construct a sportsbook cage. The estimated cost of constructing the sportsbook cage is \$100,000. This cost includes panic alarms, windows, drawers, cabinets, countertops, physical barriers, and other necessary equipment.

11 Retail Sports Wagering Operators (2 sports teams and 9 casinos) will need to employ 2 security officers.

The annual cost to employ a security officer is estimated to be \$60,000.

**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 45-20.490 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 833–834). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

**COMMENT #1:** Sections (1) and (2) – A staff member suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (2) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Private Cost Statement – The Joint Committee on Administrative Rules suggested adding a fiscal note to account for required equipment and employees required for the drop and count.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and added a fiscal note for jumpsuits and employees required for the drop and count.

**11 CSR 45-20.490 Mandatory Drops**

(1) Retail licensees shall drop and count the licensee’s gross receipts from sports wagering at least once every seven (7) calendar days.

(2) Retail licensees shall report to the commission the time(s) when the required drop devices of kiosks will be removed and the contents counted. All drop devices shall be removed and counted at the time(s) previously designated to the commission. Removal and counting of contents at any time(s) other than the designated time(s) is prohibited unless the licensee provides advance written notice to the commission of a change in time(s). An emergency removal of the funds may only be

conducted due to a drop device malfunction or full drop device and shall be conducted in accordance with the approved internal controls.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of one hundred forty-three thousand seven hundred dollars (\$143,700) versus the estimated cost of less than five hundred dollars (\$500) in the aggregate, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.490 Mandatory Drops
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$143,700.00

**III. WORKSHEET**

Retail Licensees (7 licensees x 2 jumpsuits x \$50 per jumpsuit)	\$700.00
Retail Licensees (11 licensees x 2 employees x 5 hours per week x 52 weeks x \$25 per hour)	\$143,000.00
<b>TOTAL</b>	<b>\$143,700.00</b>

**IV. ASSUMPTIONS**

7 Retail Licensees (2 sports teams and 5 operators partnered with casinos) will need to purchase 2 jumpsuits.  
The estimated cost per jumpsuit is \$50.  
The jumpsuits will need to be replaced annually.  
11 Retail Licensees (2 sports teams and 9 casinos) will need to pay 2 employees \$25 per hour for approximately 5 hours per week.

**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 45-20.500 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 834–835). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. The Joint Committee on Administrative Rules made two (2) comments on the proposed rule.

**COMMENT #1:** Section (1) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Subsection (5)(F) – Cory Fox, with FanDuel, suggested revising the language to limit the requirement to “tax workpapers related to any Missouri gaming tax return used in the preparation of the Missouri state or federal tax return.”

**RESPONSE:** The rule requires licensees to maintain detailed, supporting, and subsidiary records. During licensing investigations, the commission may review this documentation. This information would be confidential. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Subsection (5)(K) – The Joint Committee on Administrative Rules suggested revising the language to reference federal law in general, instead of noting the specific law.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.500 Accounting Records**

(1) Retail and Mobile licensees shall maintain complete, accurate, legible, and permanent records of all transactions pertaining to its revenues, expenses, assets, liabilities, and equity.

(5) The detailed, supporting and subsidiary records shall include at a minimum the following:

(K) Records required to fully comply with all federal financial recordkeeping as required by federal law;

**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 45-20.510 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 835). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Sections (1) and (2) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.510 Record Retention**

(1) Retail licensee and Mobile licensees shall maintain in a place, secure from theft, loss, or destruction, adequate records of business operations and all records noted in this chapter or the internal control system that shall be made available to the commission upon request. These records shall be maintained for five (5) years or longer if otherwise prescribed by general accounting and auditing procedures, litigation needs, or state or federal law. These records shall be maintained either physically or digitally in a manner accessible to the commission.

(2) Retail licensees and Mobile licensees shall keep accurate, complete, and legible records of any books, records, or documents pertaining to, prepared in, or generated by the sports wagering operation, regardless of physical form, characteristics, or subject matter. Such records shall include, but are not limited to, all forms, reports, accounting records, ledgers, subsidiary records, computer maintained and generated data, internal audit records, internal control records, patron complaints, copies of all promotional material and advertising, correspondence, and personnel records.

**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 45-20.520 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 835–836). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule. The Joint Committee on Administrative Rules made four (4) comments on the proposed rule.

**COMMENT #1:** Sections (1), (4), and (6)-(9) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (1) – The Joint Committee on Administrative Rules suggested revising as the language is unclear as to what was required by prescribing the transmission and format.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Section (1) – Rebecca London, with DraftKings, suggested revising this section to make the last sentence subsection (1)(A).

**RESPONSE:** Making this a subsection does not change the meaning or clarity of the rule. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Section (8) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #5:** Section (8) – Rebecca London, with DraftKings, suggested revising the language to state, “A remediation report and necessary revenue adjustments shall be due within thirty (30) calendar days...” instead of stating, “The revised filing shall be due within thirty (30) calendar days...”

**RESPONSE:** The intent of the rule is to obtain the corrected annual report. No changes have been made to the rule as a result of this comment.

COMMENT #6: Private Cost Statement – The Joint Committee on Administrative Rules suggested adding a fiscal note to account for the cost of preparing annual reports and monthly statistical data reports.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and added a fiscal note to account for the cost of preparing annual reports and monthly statistical data reports.

## **11 CSR 45-20.520 Standard Financial and Statistical Records**

(1) Retail licensees and Mobile licensees shall file monthly reports of statistical data and annual reports of their financial statements with the commission using electronic transmission as prescribed in this rule. Financial statements shall include a balance sheet, income statement, statement of cash flows, and statement of changes in equity.

(4) Annual reports shall be based on the Retail licensee's or Mobile licensee's fiscal year. Monthly statistical reports shall be based on calendar months.

(6) Retail licensees and Mobile licensees shall submit any adjustments to the reports resulting from review or audit by the commission within five (5) business days after written notification.

(7) Delays in electronic transmissions are the Retail licensee's or Mobile licensee's responsibility.

(8) Any adjustments resulting from the annual audit performed by an independent certified public accountant shall be recorded in the accounting records of the period to which it relates. In the event that the adjustments were not reflected in the Retail licensee's or Mobile licensee's annual report and the independent certified public accountant concludes the adjustments are material, a revised report shall be submitted to the commission. The revised filing shall be due within thirty (30) calendar days after written notification to the licensee.

(9) Retail licensees and Mobile licensees shall furnish to the commission, upon its written request, statistical and financial data for the purpose of compiling, evaluating and disseminating financial information regarding the economics and trends within the sports wagering industry in Missouri.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of four hundred twenty thousand dollars (\$420,000) versus the estimated cost of less than five hundred dollars (\$500) in the aggregate, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.520 Standard Financial and Statistical Records
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$126,000.00
14	Mobile Licensees	\$294,000.00

**III. WORKSHEET**

Retail (11 licensees x \$500 per monthly statistical data report x 12 months)	\$66,000.00
Mobile (14 licensees x \$500 per monthly statistical data report x 12 months)	\$84,000.00
Retail (4 licensees x \$15,000 per annual report)	\$60,000.00
Mobile (14 licensees x \$15,000 per annual report)	\$210,000.00
<b>TOTAL</b>	<b>\$420,000.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams) will each spend \$500 per month preparing the statistical data report.

14 Mobile licensees (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding a direct license) will each spend \$500 per month preparing the statistical data report.

4 Retail licensees will spend \$15,000 per year preparing the annual report. These 4 Retail licensees will be a separate entity from the Mobile licensees and will therefore prepare and submit separate annual reports.

14 Mobile licensees will spend \$15,000 per year preparing the annual report. 7 of these operators will prepare and submit annual reports that encompass their retail operations as well.

**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 45-20.530 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 836–837). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Sections (1) and (3) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Private Cost Statement – A staff member suggested revising the fiscal note to reflect the new anticipated number of Retail licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised the fiscal note to change the number of Retail licensees.

**11 CSR 45-20.530 Annual and Special Audits and Other Reporting Requirements**

(1) An annual audit shall be performed of the annual financial statements of the Missouri sports wagering operation of each Retail and Mobile licensee. If a licensee has audited financial statements prepared at the parent company level, the licensee shall include with its audited consolidated financial statements a supplemental schedule, which may be unaudited, of the licensee’s sports wagering operations in Missouri. The annual audit shall be performed by an independent certified public accountant who is or whose firm is licensed in the state of Missouri.

(3) The commission may require, for just cause, a special audit of a Retail or Mobile sports wagering operation to be conducted by an independent certified public accountant who is, or whose firm is, licensed in Missouri. The commission shall establish the scope, procedures, and reporting requirements of any special audit.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of \$1,250,000 versus the estimated annual cost of \$1,450,000, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.530 Annual and Special Audits and Other Reporting Requirements
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$550,000.00
14	Mobile Licensees	\$700,000.00

**III. WORKSHEET**

Retail (11 licensees X \$50,000 per annual audit)	\$550,000.00
Mobile (14 licensees X \$50,000 per annual audit)	\$700,000.00
<b>TOTAL</b>	<b>\$1,250,000.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams)

14 Mobile licensees (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses)

The cost of the contract with a certified public accountant to perform the annual audit is \$50,000 (250 hours X \$200 per hour).

**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 45-20.540 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 838). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Section (2) – The Joint Committee on Administrative Rules suggested revising to specify where the electronic funds transfer requirements imposed by the state can be found.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (6) – Rebecca London, with DraftKings, suggested revising the current language to clarify whether this includes discretionary customer credits.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised to remove this section, as Article III, Section 39(g), of the *Missouri Constitution* already states when promotional credits may be deducted. Renumbered the remaining sections.

**11 CSR 45-20.540 Wagering Tax**

(2) Wagering taxes shall be paid via an electronic funds transfer system employing an Automated Clearinghouse Debit method (ACH-Debit). Each Retail and Mobile licensee shall maintain an account with sufficient funds to pay, in a timely fashion, all tax liabilities due. The account shall be maintained at a financial institution capable of making electronic funds transfer payments to the state.

(6) If the amount of adjusted gross revenue in a calendar month is a negative number, the licensee shall remit no sports wagering tax for that calendar month. Any negative adjusted gross revenue shall be carried over and calculated as a deduction in the subsequent calendar months until the negative balance has been brought to zero.

(7) The sports wagering tax remittal shall include all information necessary for adjustments and reconciliation of tax liability and shall be subject to audit by the commission. Adjustments to previously reported tax information shall be made by the licensee, except that no adjustment of twenty-five thousand dollars (\$25,000) or more shall be made to previously reported adjusted gross revenue without the prior written approval of the commission.

**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 45-20.550 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 838–842). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received twelve (12) written comments on the proposed rule. Commission staff made four (4) comments on the proposed rule.

**COMMENT #1:** Section (4) – Rebecca London, with DraftKings, requested clarification as to whether this section applies only to Retail licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised to specifically reference Retail licensees.

**COMMENT #2:** Section (10) – Rebecca London, with DraftKings, suggested revising this section to remove Mobile licensees from the requirements.

**RESPONSE:** Mobile licensees have electronic tickets and audits of these are necessary for the integrity of the sports wagering operation. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (10) – A staff member suggested revising the language to require a monthly review instead of daily.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised daily to monthly.

**COMMENT #4:** Sections (10) and (13) – Daniel Rainieri, with BetMGM, suggested revising these sections to remove Mobile licensees from these requirements.

**RESPONSE:** Mobile licensees have electronic tickets that need to be audited and system exception reports that need to be reviewed for the integrity of the sports wagering operation. No changes have been made to the rule as a result of this comment.

**COMMENT #5:** Section (13) – A staff member suggested revising the language to require a weekly review instead of daily.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised daily to weekly.

COMMENT #6: Section (14) – Daniel Rainieri, with BetMGM, suggested revising the current language to clarify if the monthly attestation needs to be submitted on a specific day of the month and if a specific format will be required.

RESPONSE AND EXPLANATION OF CHANGE: Partially agreed and revised to clarify when the attestation shall be remitted. No change was made requiring a specific format.

COMMENT #7: Section (16) – A staff member suggested revising the language to reference federal law in general, instead of noting the specific law.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #8: Section (17) – Rebecca London, with DraftKings, requested confirmation that Mobile licensees are not required to maintain separate documentation for each promotion offered because Mobile platforms automatically document the requested information.

RESPONSE: This rule does not require duplicate or separate documentation. It requires that Mobile licensees maintain, in a manner consistent with their respective platforms, the necessary information regarding promotions. No changes have been made to the rule as a result of this comment.

COMMENT #9: Section (18) – Rebecca London, with DraftKings, suggested revising the current language to remove Mobile licensees from the requirements of this rule as Mobile licensees operate with automated systems that are programmed to enforce promotional terms, track user eligibility, and execute payouts in accordance with preset conditions.

RESPONSE: Preset conditions are still subject to human error and, as Retail and Mobile licensees may take deductions based on promotional activity, it is necessary to ensure that promotions are run according to the promotional rules. No changes have been made to the rule as a result of this comment.

COMMENT #10: Section (19) – Rebecca London, with DraftKings, suggested specifying that this section pertains only to Retail licensees.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to note this addresses sensitive keys for Retail licensees.

COMMENT #11: Section (20) – Rebecca London, with DraftKings, suggested revising the current language to remove Mobile licensees from the requirements of this rule as mobile platforms operate through automated systems that log all activity digitally and include audit trails, account status changes, and system exceptions.

RESPONSE: While mobile platforms are highly automated and digitized, human input is still present and confirming the accuracy of point addition/deletion, exception reports, and account statuses is necessary for the integrity of the sports wagering operation. No changes have been made to the rule as a result of this comment.

COMMENT #12: Subsection (20)(C) – Daniel Rainieri, with BetMGM, suggested revising the current language to replace requiring two employees to review an inactive account, and instead, apply the Mobile license's patron reactivation procedures noted in the Mobile license's internal controls.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #13: Section (21) – Rebecca London, with DraftKings, suggested removal of this section as it is duplicative of existing regulatory frameworks and Gaming Laboratories International (GLI) testing.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised this section in its entirety. Renumbered remaining section.

COMMENT #14: Section (21) – Adam Kates, with PENN Entertainment, requested clarification as to whether third-party testing would be compliant with this section.

RESPONSE: This section has been removed. No changes have been made to the rule as a result of this comment.

COMMENT #15: Section (22) – Rebecca London, with DraftKings, suggested revising the language to only apply to Retail licenses.

RESPONSE: Audit procedures for both Retail and Mobile licensees shall be documented. No changes have been made to the rule as a result of this comment.

COMMENT #16: Private Cost Statement – A staff member suggested revising the fiscal note to reflect the new anticipated number of Retail licensees.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised the fiscal note to change the number of Retail licensees.

## **11 CSR 45-20.550 Procedures for Accounting and Revenue Audit**

(4) Any overages identified on the Retail licensee's sports wagering intake summary report shall be added to sports wagering revenue, unless otherwise authorized by the tax section of the commission.

(10) For Retail and Mobile licensees, a revenue auditor or compliance employee shall, on a monthly basis, perform the following for all winning tickets in excess of ten thousand dollars (\$10,000) and for a random sample of ten (10) of all other winning tickets:

(13) For Retail and Mobile licensees, on a weekly basis, system exception reports shall be reviewed, by an individual independent of the transaction, for propriety of transactions and unusual occurrences including but not limited to changes in odds, cut-off times, results, and event data (both information input by book employees, and information provided directly by a disseminator); in-progress events and void authorizations. All noted improper transactions or unusual occurrences noted during the review of exception reports shall be investigated with the results documented. If a regulatory violation is found, it shall be reported to the commission. An exception report is defined as a report produced by the computerized system identifying unusual occurrences, changes to system configuration parameters, alteration to initially recorded data, voids, etc.

(14) For the last day of each month, Retail and Mobile licensees shall verify the cash reserve meets all requirements of this chapter. By the fifteenth day of the following month, each licensee shall

remit to the commission a monthly attestation of the cash reserve compliance with accompanying documentation.

(16) For Retail licensees, revenue audit or compliance personnel shall, on a daily basis, review all wagering multiple transaction logs and either ensure that Currency Transaction Reports (CTRs) have been completed for all reportable transactions or prepare CTRs for all reportable transactions pursuant to federal law.

(19) Sensitive keys for Retail licensees include but are not limited to keys used to access designated nonpublic gaming areas, date and time stamping machines, ticket writer drawers, and kiosks. Quarterly, an inventory of all sensitive keys shall be performed and reconciled to records of keys made, issued, and destroyed. Investigations shall be performed for all keys unaccounted for, with the investigations being documented.

(20) For sports wagering computerized player tracking systems for Retail and Mobile, an accounting or revenue audit employee shall perform the following procedures at least one (1) day per quarter:

(C) Review the documentation related to reactivating inactive and closed accounts to verify an employee reviewed the inactive account and affirmed that the account is permitted to be reopened prior to reopening.

(21) Documentation (e.g., log, checklist, notation on reports, and tapes attached to original documents) shall be maintained evidencing the performance of sports wagering audit procedures, including any reviews, the exceptions noted, and follow-up of all audit exceptions.

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of \$1,135,000 versus the estimated annual cost of \$1,395,000, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.550 Procedures for Accounting and Revenue Audit
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$715,000.00
14	Mobile Licensees	\$420,000.00

**III. WORKSHEET**

Retail (11 licensees X \$65,000 annually)	\$715,000.00
Mobile (14 licensees X \$30,000 annually)	\$420,000.00
<b>TOTAL</b>	<b>\$1,135,000.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams)

14 Mobile licensees (6 casino parent companies, 6 sports teams, and 2 sports wagering operators holding direct Mobile licenses)

Each Retail licensee will need to employ one Revenue Auditor to perform required reviews.

The cost for a Retail licensee to employ one Revenue Auditor will be \$65,000 per year, including benefits.

Each Mobile licensee will need to employ one Revenue Auditor or Compliance Representative on a part-time basis to perform required reviews.

The cost for a Mobile licensee to employ one Revenue Auditor or Compliance Representative part-time will be \$30,000 per 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 45-20.560 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 843–844). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) 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:** A staff member suggested revising the title of the rule to clarify that it only applies to the internal audit procedures for Retail licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Private Cost Statement – A staff member suggested revising the fiscal note to reflect the new anticipated number of Retail licensees.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised the fiscal note to change the number of Retail licensees.

**11 CSR 45-20.560 Internal Audit Procedures for Retail Licensees**

*REVISED PRIVATE COST: The cost to private entities is an estimated annual cost of nine hundred ninety thousand dollars (\$990,000) versus the estimated annual cost of \$1,350,000, 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**

<b>Rule Number and Title:</b>	11 CSR 45-20.560 Procedures for Internal Audit
<b>Type of Rulemaking:</b>	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:
11	Retail Licensees	\$990,000.00

**III. WORKSHEET**

Retail (11 licensees X \$90,000 for one Internal Auditor)	\$990,000.00
<b>TOTAL</b>	<b>\$990,000.00</b>

**IV. ASSUMPTIONS**

11 Retail licensees (9 casinos and 2 sports teams)

Each Retail licensee will need to employ one Internal Auditor to perform required reviews.

The annual cost to employ one Internal Auditor will be \$90,000.

**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 45-20.570 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 845–846). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received six (6) written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Sections (1), (3)-(8), and (10)-(12) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (4) – Daniel Rainieri, with BetMGM, suggested revising the language to clarify material terms and conditions for promotions and outline exceptions to sizing limitations.

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised to further clarify what material conditions include.

**COMMENT #3:** Subsection (6)(A) – Rebecca London, with DraftKings, requested clarification as to whether this subsection means the date and time the promotion was made publicly available.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Section (10) – Daniel Rainieri, with BetMGM, suggested revising the language regarding how patrons may view the terms and conditions of a promotion.

**RESPONSE:** This language is in Article III, Section 39(g), of the *Missouri Constitution*. No changes have been made to the rule as a result of this comment.

**Comment #5:** Section (12) – John Mehaffey, a member of the general public, suggested revising the language to prohibit affiliate marketing businesses from receiving payment based on the number of patrons acquired.

**RESPONSE:** This rule is consistent with marketing restrictions in other jurisdictions. No changes have been made to the rule as a result of this comment.

COMMENT #6: Section (13) – A staff member suggested removing this section as this language is in Article III, Section 39(g), of the *Missouri Constitution*.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #7: Section (13) – Adam Kates, with PENN Entertainment, requested clarification as to whether promotions may not be shown when a patron is located within a sports district.

RESPONSE: This section has been removed as this language is duplicative of language in Article III, Section 39(g), of the *Missouri Constitution*. No changes have been made to the rule as a result of this comment.

COMMENT #8: Section (13) – Rebecca London, with DraftKings, requested clarification as to how this section would be enforced.

RESPONSE: This section has been removed as this language is duplicative of language in Article III, Section 39(g), of the *Missouri Constitution*. No changes have been made to the rule as a result of this comment.

## **11 CSR 45-20.570 Promotions and Marketing**

(1) Retail licensees and Mobile licensees may offer sports wagering promotions, which are any events designed to attract patrons. Promotions include but are not limited to contests, drawings, games, player reward programs, coupons, giveaways, free play, and promotional credit offers. Licensees shall be responsible for the conduct of promotional activities.

(3) Retail licensees and Mobile licensees shall create and maintain dated, written rules governing each promotion offered. The written rules shall—

(4) Retail licensees and Mobile licensees shall ensure advertising materials for promotions include material terms and conditions for that promotion and have those material terms in close proximity to the headline claim of the promotion and in a reasonably prominent size. Material conditions include information about the cost to participate and the nature of the promotion, to assist patrons in understanding the terms and conditions of the promotion.

(5) Retail licensees and Mobile licensees shall ensure the promotional rules pertaining to any available promotions are accessible to patrons and the commission upon request. Any advertisement or information provided to patrons for a promotion shall be consistent with the rules of the promotion.

(6) Retail licensees and Mobile licensees shall maintain a record of all promotional wagering offers for five (5) years in a file that shall be provided to the commission upon request. All promotional wagering offers shall be stated in clear and unambiguous terms and shall be readily accessible by the patron before and after the offer is accepted and prior to completion. Offer terms and the record of all offers shall include at a minimum—

(A) The date and time made publicly available;

(7) Retail licensees and Mobile licensees shall be responsible for the content and conduct of any and all advertising or marketing done on its behalf or to its benefit whether conducted by the licensee, an employee or agent of the licensee, an affiliated entity, or a third party pursuant to contract.

(8) Retail licensees and Mobile licensees shall retain a copy of all advertising and marketing materials intended to promote any sports wagering operation in the state of Missouri, including a publication log, to be retained for five (5) years, of when and how those materials have been published, aired, displayed, or distributed.

(10) Retail licensees and Mobile licensees shall use commercially and technologically reasonable means to ensure marketing and advertisements—

(11) All advertising and marketing materials published, aired, displayed, or distributed by or on behalf of any Retail licensee or Mobile licensee—

(12) Retail licensees and Mobile licensees shall not enter into an agreement with a third party to conduct advertising or marketing on behalf of, or to the benefit of, the licensee when compensation is dependent on, or related to, the volume or outcome of wagers instead of the number of patrons acquired.

**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 45-20.580 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 846–847). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received five (5) written comments on the proposed rule.

**COMMENT #1:** Section (2) – Daniel Mulhall, with Fanatics Betting and Gaming, requested revising the language to offer hourly limits instead of weekly and monthly. Additionally, he suggested revising subsection (2)(D) for clarification to state, “Total dollar amount of wagers.”

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised to clarify that the items listed in section (2) are minimum requirements. Article III, Section 39(g), of the *Missouri Constitution*, requires licensees to offer the limits identified by this section; however, licensees may offer additional limits, such as hourly.

**COMMENT #2:** Section (2) –Rebecca London, with DraftKings, requested clarification on whether licensees are required to offer all limit categories listed (daily, weekly, and monthly) for each category outlined in the regulation or whether compliance is satisfied by offering one or more of these options per category.

**RESPONSE:** Article III, Section 39(g), of the *Missouri Constitution* states, “limits in a daily, weekly, or monthly manner.” Therefore, an operator must offer all three limits (daily, weekly, or monthly) for categories (A) through (D). No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (3) – Rebecca London, with DraftKings, suggested revising the language to clarify that more restrictive limits must be completed before a patron can select a less restrictive limit or removal of a limit.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Section (5) – Rebecca London, with DraftKings, suggested revising this section to clarify whether patrons could select custom periods of temporary suspension.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised to clarify that each operator can offer selected periods for suspensions consistent with its terms and conditions.

COMMENT #5: Section (7) – Adam Kates, with PENN Entertainment, requested clarification as to whether the marketing restriction in this section applies only to self-excluded and cool-off individuals, or if marketing materials are not to be sent to individuals who set deposit limits or wager limits.

RESPONSE: This section applies to individuals utilizing temporary suspensions, not individuals who have placed limits but still participate in wagering. No changes have been made to the rule as a result of this comment.

## **11 CSR 45-20.580 Responsible Gaming**

(2) The online sports wagering platform shall allow, at a minimum, a patron to place daily, weekly, or monthly limits on—

(3) A limitation selected by a patron shall remain in effect until a patron requests to modify or remove the limitation. If the request is more restrictive, it shall become effective immediately. If the request is less restrictive or is for removal of the limit, the new limit or removal will only become effective after the more restrictive limit has elapsed.

(5) Patrons shall be permitted to determine the length of time of the temporary suspension, consistent with the Mobile licensee's terms and conditions, but no such suspension shall be imposed for less than seventy-two (72) hours or greater than one (1) year. The temporary suspension shall not be modified or removed until the selected period of suspension has expired.

**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 45-20.590 Compulsive Gaming Prevention Fund is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 847). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule.

COMMENT #1: Subsection (1)(A) – Cole Wogoman, with the National Council on Problem Gambling, suggested revising the language to state “Researching and detecting patterns of compulsive gambling as well as the prevalence of gambling addiction in the state and the best methods to decrease said prevalence.”

RESPONSE: This is language from Article III, Section 39(g), of the *Missouri Constitution*. No changes have been made to the rule as a result of this comment.

COMMENT #2: Cole Wogoman, with the National Council on Problem Gambling, suggested changing the “Compulsive Gaming Prevention Fund” to the “Compulsive Gambling Prevention Fund” or “Problem Gambling Prevention Fund.” He also suggested using the terminology “problem gambling” instead of “problem gaming”.

RESPONSE: This is the name of the fund and terminology used in Article III, Section 39(g), of the *Missouri Constitution*. 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 45-20.600 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 847–848). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received seven (7) written comments on the proposed rule. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Section (2) – Rebecca London, with DraftKings, suggested revising the timeframe for exclusion to include options for one (1) year and five (5) years.

**RESPONSE:** Periods of one (1) year are available through temporary suspension options. No changes have been made to the rule as a result of this comment.

**COMMENT #2:** Section (2) – Daniel Rainieri, with BetMGM, suggested revising “calendar days” to “business days” to align with industry standards.

**RESPONSE:** Given that this industry operates 24 hours a day, using “business days” may not be clear to all parties while “calendar days” is clear. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Section (2) – Jeremiah Weinstock, a Missouri constituent, suggested revising the periods of exclusion from five (5) years to one (1) year, five (5) years, or lifetime.

**RESPONSE:** The rule, as written, allows the commission to maintain the integrity and accuracy of the self-exclusion list. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Section (5) – Rebecca London, with DraftKings, requested clarification as to whether the commission would notify licensees of individuals no longer on the SEP List and suggested revising the language for clarity. She also requested the addition of a one- (1-) year exclusion period.

**RESPONSE AND EXPLANATION OF CHANGE:** Partially agreed and revised to specify notification will be made by the commission that an individual has been removed from the SEP List. Additionally, periods of one (1) year are available through temporary suspension options.

COMMENT #5: Section (6) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #6: Paragraph (6)(C)1. – Rebecca London, with DraftKings, suggested revising the language to clarify that this paragraph would not prevent a patron from withdrawing the funds from his or her wagering account.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #7: Paragraph (6)(C)1. – The Joint Committee on Administrative Rules suggested revising the language to clarify these limitations apply to sports wagering activity.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #8: Paragraph (6)(C)4. – Rebecca London, with DraftKings, suggested revising the language to specify that wagering accounts cannot be created after exclusion.

RESPONSE: The preamble to this paragraph specifies that the individuals in question are already on the SEP List. No changes have been made to the rule as a result of this comment.

COMMENT #9: Paragraph (6)(C)6. – The Joint Committee on Administrative Rules suggested revising the language to make it less arbitrary.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

COMMENT #10: Paragraph (6)(C)6. – Rebecca London, with DraftKings, suggested removing this paragraph as it may be a deterrent for individuals to sign up for the self-exclusion list.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

## **11 CSR 45-20.600 Self-Excluded Persons List Created—Right to Self-Exclude from Sports Wagering Activities**

(5) All Retail and Mobile licensees shall ensure that they have a process for removing any restriction on creating an online sports wagering account or placing a wager by any person after that person's placement on the SEP List has elapsed at the end of the five- (5-) year exclusion period upon notice from the commission that an individual has been removed from the SEP List.

(6) All Retail and Mobile licensees shall submit internal controls which set forth the following:

(C) The licensee's plan for denying access by persons on the SEP List to—

1. Cash advances, credit card transactions, debit card transactions, and wire transfers for deposits into the patron's wagering account or for placing wagers;
2. Sports wagering player reward programs or other promotions;
3. Sports wagering;
4. Creation of online sports wagering accounts;
5. Sports wagering privileges; and
6. Collect taxable winnings or prizes and any winnings greater than three thousand dollars (\$3,000) at retail locations and all winnings for mobile wagers for wagers placed after placement on the SEP List.

**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 45-20.610 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 848–849). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

**COMMENT #1:** Subsection (1)(A) – Rebecca London, with DraftKings, suggested revising this subsection to add a one- (1-) year exclusion option.

**RESPONSE:** Periods of one (1) year are available through temporary suspension options. No changes have been made to the rule as a result of this comment.

**COMMENT #2:** Paragraph (1)(A)12. – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**11 CSR 45-20.610 Procedure for Applying for Placement on the List of Self-Excluded Persons**

(1) The commission may place a person on the SEP List if the person has—

(A) Filed an application for placement on the SEP List with the commission. The applicant agrees that placement on the SEP List is for five (5) years and the commission is not authorized to remove a person from the SEP List until such five- (5-) year period has elapsed. By filing the application, the applicant acknowledges that licensees may use the information provided in the application to notify their affiliated sports wagering operations that the applicant has self-excluded from sports wagering. Therefore, the applicant may be excluded from sports wagering in other jurisdictions as a result of his or her request to be placed on the SEP List. The applicant agrees that any unsettled in-person wagers may be voided and refunded within fourteen (14) calendar days of placement on the list and all unsettled online wagers will be voided and refunded. The applicant agrees that once placed on the SEP List, if he or she is discovered to be participating in sports

wagering, any winnings will be forfeited. The application for placement on the SEP List shall include:

12. Other information as deemed necessary by the commission to ensure the accuracy of the application;

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**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 45-20.620 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 849). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received no written comments on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

COMMENT #1: Section (1) – The Joint Committee on Administrative Rules suggested revising the language to qualify which employees receive notice of individuals placed on the SEP List.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

**11 CSR 45-20.620 Procedure for Entry of Names onto the List of Self-Excluded Persons**

(1) Upon filing of an application for placement on the SEP List, the commission may file a notice of placement on the SEP List. Notwithstanding the status of some information contained therein that may be closed under section 610.021, RSMo, the application and notice may be disclosed to all Retail and Mobile licensees and their agents and employees responsible for ensuring that individuals on the SEP List are not permitted to place wagers.

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**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 45-20.630 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 849–850). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Section (1)-(3) – The Joint Committee on Administrative Rules suggested clarifying which licensees are being referenced.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (1) – The Joint Committee on Administrative Rules suggested revising the language to qualify which employees receive notice of individuals placed on the SEP List.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #3:** Section (3) – The Joint Committee on Administrative Rules suggested revising the language to qualify which affiliates receive notice of individuals placed on the SEP List.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Section (3) – A staff member suggested removing unnecessary language that states, “All disclosures must be made in accordance with procedures approved by the commission. Written approval of the commission is required prior to disclosing this information.”

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #5:** Section (3) – Rebecca London, from DraftKings, suggested revising this section to allow operators to share the exclusion list on a broader scale and to exclude individuals on the SEP List from other platforms offered by that operator.

**RESPONSE:** The restrictions on sharing the SEP List prevent unintended sharing of patrons’ sensitive information. Further, Article III, Section 39(g), of the *Missouri Constitution*, does not provide the commission the authority to exclude individuals from fantasy sports. No changes have been made to the rule as a result of this comment.

## **11 CSR 45-20.630 Confidentiality of the List of Self-Excluded Persons**

(1) The commission may disclose to each Retail licensee and Mobile licensee and any of its agents or employees responsible for ensuring that individuals on the SEP List are not permitted to place wagers any or all information contained on the person's application. The commission shall make the current SEP List available to Retail and Mobile licensees for download.

(2) Each Retail licensee and Mobile licensee shall submit to the commission a plan for the dissemination of the information regarding persons placed on the SEP List, as well as persons who have been removed from the SEP List. The plan shall be designed to safeguard, as best as is reasonably possible, the confidentiality of the information but shall include dissemination to the agents or employees of the licensee whose duties require enforcement of the SEP List. Licensees or agents or employees of the licensee may not disclose the name of, or any information about, a person who has been placed on or removed from the SEP List to anyone other than employees and agents of the licensee whose duties and functions require access to the information. The plan must be approved by the commission. All information disclosed to any licensee regarding anyone placed on or removed from the SEP List shall be deemed a closed record; however, the information may be disclosed as authorized by the individual seeking placement on the SEP List, by law, and through the provisions contained in this chapter.

(3) Retail licensees and Mobile licensees may disclose the information contained in the applications to its affiliates or agents of such affiliates who require this information in the performance of their duties. The disclosed information shall be used solely for the limited purposes of assisting in the administration of problem and responsible gaming programs and allowing the affiliate or agent of the affiliate to determine whether to deny a person on the SEP List access to sports wagering or to areas where sports wagering is conducted. Licensees may also disclose the information contained in the applications to entities engaged in marketing activities on their behalf, solely to the extent necessary to prohibit excluded individuals from receiving direct marketing or promotional communications. The licensee is responsible for maintaining the confidentiality of any information disclosed. Such information shall not be used to deny services unrelated to sports wagering to a person on the SEP List.

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**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 45-20.640 Procedure to Re-Establish Self-Exclusion of the List of Self-Excluded Persons is adopted.**

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 850). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received one (1) written comment on the proposed rule.

COMMENT #1: Section (1) – Rebecca London, with DraftKings, suggested revising this language to clarify that Retail and Mobile licensees will be notified once an individual is removed from the SEP List. She also requested the addition of a one- (1-) year exclusion period.

RESPONSE: Periods of one (1) year are available through temporary suspension options. Commission notification of removal has been updated in 11 CSR 45-20.650. No changes have been made to the rule as a result of this comment.

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**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 45-20.650 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 850–851). 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 July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received three (3) written comments on the proposed rule. Commission staff made two (2) comments on the proposed rule.

**COMMENT #1:** Section (1) – A staff member suggested revising the language to specify that updates to the SEP List will include individuals added to the List as well as individuals who are being removed from the List.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #2:** Section (2) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising this language to allow licensees forty-five (45) days to remove individuals placed on the SEP List from direct marketing and advertising.

**RESPONSE:** Licensees have a responsibility to download updates to the SEP List every seven (7) days and update SEP List information within three (3) days of download. Such updates would require communication with marketing affiliates in a timely manner. No changes have been made to the rule as a result of this comment.

**COMMENT #3:** Subsection (5)(B) – A staff member suggested revising the language to be consistent with the revision made to 11 CSR 45-20.600(6)(C)6.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised.

**COMMENT #4:** Subsection (8)(C) – Cory Fox, with FanDuel, suggested revising the language to remove the subsection because it would encourage bad actors to avoid unfavorable betting outcomes.

**RESPONSE:** The commission's SEP List is an automatic five- (5-) year ban from all sports wagering across all Retail and Mobile licensees in Missouri. Therefore, the commission believes that individuals using this rule as a tactic to avoid unfavorable wagering outcomes would be minimal. In addition, this approach allows the individual to end their contact with Retail and

Mobile licensees in a faster manner. This approach is also consistent with other jurisdictions. No changes have been made to the rule as a result of this comment.

COMMENT #5: Subsection (8)(C) – Rebecca London, with DraftKings, suggested revising the language to remove the subsection because allowing these wagers to settle maintains wagering integrity and prevents potential abuse of the self-exclusion process, such as voiding unfavorable bets after placement.

RESPONSE: The commission's SEP List is an automatic five- (5-) year ban from all sports wagering across all Retail and Mobile licensees in Missouri. Therefore, the commission believes that individuals using this rule as a tactic to avoid unfavorable wagering outcomes would be minimal. In addition, this approach allows the individual to end their contact with Retail and Mobile licensees in a faster manner. This approach is also consistent with other jurisdictions. No changes have been made to the rule as a result of this comment.

## **11 CSR 45-20.650 Duties of Licensees Regarding the List of Self-Excluded Persons**

(1) Retail and Mobile licensees shall download the updates to the SEP List from the designated commission server at least once every seven (7) calendar days and update SEP List information in all associated applications within three (3) calendar days of the download of new or updated information. The updates to the SEP List will include individuals added to and removed from the SEP List since the last update.

(5) Prior to performing any of the following transactions with a patron, the Retail licensee shall require the patron to present valid, non-expired state or federal government-issued photo identification. The licensee shall perform a search of the individual's date of birth as listed on the identification in the downloaded SEP List or the MGC Web SEP List to determine whether the patron is a self-excluded person (SEP). If the search generates any names that have the same first or last name as recorded on the photo identification, the licensee shall research further to determine if the individual presenting the ID is a SEP. The Retail licensee shall check the SEP List prior to performing any of the following transactions:

(B) Redeeming a winning ticket greater than three-thousand dollars (\$3,000);