



# Common Sense Initiative

Mike DeWine, Governor  
Jon Husted, Lt. Governor

Joseph Baker, Director

## Business Impact Analysis

Agency, Board, or Commission Name: Ohio Casino Control Commission (“Commission”)

Rule Contact Name and Contact Information: Andromeda Morrison, 614-387-5616, rulecomments@casinocontrol.ohio.gov

Regulation/Package Title (a general description of the rules’ substantive content):

3775-16-03 Sports Gaming Accounts Amendments

Rule Number(s): 3775-16-03

Date of Submission for CSI Review: 3/7/24

Public Comment Period End Date: 3/21/24

Rule Type/Number of Rules:

New/\_\_\_ rules

No Change/\_\_\_ rules (FYR? \_\_\_)

Amended/ 1 rules (FYR? No)

Rescinded/\_\_\_ rules (FYR? \_\_\_)

The Common Sense Initiative is established in R.C. 107.61 to eliminate excessive and duplicative rules and regulations that stand in the way of job creation. Under the Common Sense Initiative, agencies must balance the critical objectives of regulations that have an adverse impact on business with the costs of compliance by the regulated parties. Agencies should promote transparency, responsiveness, predictability, and flexibility while developing regulations that are fair and easy to follow. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

### **Reason for Submission**

1. R.C. 106.03 and 106.031 require agencies, when reviewing a rule, to determine whether the rule has an adverse impact on businesses as defined by R.C. 107.52. If the agency determines that it does, it must complete a business impact analysis and submit the rule for CSI review.

Which adverse impact(s) to businesses has the agency determined the rule(s) create?

The rule(s):

- a. ☒ Requires a license, permit, or any other prior authorization to engage in or operate a line of business.
- b. ☒ Imposes a criminal penalty, a civil penalty, or another sanction, or creates a cause of action for failure to comply with its terms.
- c. ☒ Requires specific expenditures or the report of information as a condition of compliance.
- d. ☒ Is likely to directly reduce the revenue or increase the expenses of the lines of business to which it will apply or applies.

### **Regulatory Intent**

2. Please briefly describe the draft regulation in plain language.

*Please include the key provisions of the regulation as well as any proposed amendments.*

Ohio Adm.Code 3775-16-03, *Sports gaming accounts*, is being amended to require sports gaming proprietors that use deposit enabled accounts (online accounts or digital wallets) to use multi-factor authentication to protect access to patrons' sports gaming accounts. The original language of this rule provided multi-factor authentication as an option instead of a requirement for the applicable sports gaming proprietors.

- **3775-16-03 (amendment), titled, "Sports gaming accounts."** This rule governs the use of and requirements for sports gaming accounts. The rule specifically governs online accounts, digital wallets, and account registrations for in-person gaming above the anonymous wager threshold. The requirements of the rule largely center around ensuring an individual's identity is verified and that any individual establishing an account or placing wagers through an account is not a prohibited person. To that end, the rule states the general requirements of accounts, including ensuring proprietors gather standard identification data and perform a standard identification check of the patron, either through a data match or through examination of a government-issued identification. Additionally, the rule ensures that patrons are provided with responsible gambling information. For accounts that are deposit-enabled (online accounts or digital wallets), the rule also implements some further consumer protections, including limit setting, greater data collection for identity verification and contact and prompt payment

requirements. The amendment to this rule changes the use of multi-factor authentication from an option to a requirement for accounts that are deposit-enabled. Sports gaming proprietors will have the option to use a “similar authentication method” as approved by the executive director. The purpose of this rule is to implement several of the required rules and provisions of R.C. 3775.02, including ensuring that wagers are accepted appropriately, there are protections for patrons placing wagers, proprietors are promoting methods to ensure responsible gambling, and that patron identities are being verified. Moreover, the rule implements R.C. 3775.11 and 3775.12’s requirements that online wagers are placed through accounts and in-person wagers are placed through a patron’s registration with the proprietor, unless the wager is below the anonymous wager threshold set in Ohio Adm.Code 3775-18-05.

- 3. Please list the Ohio statute(s) that authorize the agency, board or commission to adopt the rule(s) and the statute(s) that amplify that authority.**

3775.02, 3775.10, 3775.11, and 3775.12

- 4. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program? If yes, please briefly explain the source and substance of the federal requirement.**

Not Applicable

- 5. If the regulation implements a federal requirement, but includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.**

This question is not applicable because the federal government does not regulate sports gaming in this state. Rather, sports gaming is permitted and controlled by Ohio’s Sports Gaming Control Act (i.e., R.C. Chapter 3775).

- 6. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?**

R.C. Chapter 3775 requires the Commission to ensure the integrity of sports gaming and to prescribe rules for how sports gaming should be conducted, including rules related to sports gaming proprietor duties. To ensure the integrity of sports gaming and requirements of R.C. Chapters 3772 and 3775, it is imperative to protect sports gaming patrons by ensuring sports gaming proprietors comply with important, statutorily contemplated consumer protections. These include verifying patron identity and account information, protecting patron funds and information. R.C. 3775.02, 3775.10-3775.12.

- 7. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?**

Overall, the Commission will measure the success of these rules in terms of whether they help the Commission meet its statutory mission to ensure the integrity of sports gaming. This can be done in two ways: first, through evaluating whether the public benefit of

implementing and enforcing these rules outweigh their administrative and business costs. And second, through analyzing the regulated community's comments about requests for amendments to the rules or for waivers or variances to or from the rules.

**8. Are any of the proposed rules contained in this rule package being submitted pursuant to R.C. 101.352, 101.353, 106.032, 121.93, or 121.931?**

*If yes, please specify the rule number(s), the specific R.C. section requiring this submission, and a detailed explanation.*

No.

**Development of the Regulation**

**9. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.**

*If applicable, please include the date and medium by which the stakeholders were initially contacted.*

An email was sent on January 16, 2024, to stakeholders. (Exhibits 1 and 2). Stakeholders were asked to submit any written comments on the rules by 5:00 p.m. on January 26, 2024. (Exhibit 1). These stakeholders included employees or representatives from sports gaming vendors, proprietors, and service providers. Finally, stakeholders had the opportunity to comment during the Commission's public meeting on February 21, 2024.

**10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?**

The Commission received stakeholder comments from 11 stakeholders enclosed as Exhibit 3. Generally, the stakeholder comments involved including a timeframe for when patrons would be required to undergo multi-factor authentication. While the Commission did not specify a timeframe, sports gaming proprietors cited standards from other gaming jurisdictions.

The Commission carefully considered the input provided by stakeholders. However, no changes were made to the draft regulation. The Commission strongly believes that protecting customer accounts should be held in the highest regard, and that allowing for a timeframe between authentication events allows accounts to be vulnerable to security incidents. Staff believes that authentication at each use is best practice for accounts that permit access to customer personal information and financial assets.

**11. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?**

This question does not apply to these rules because no scientific data was necessary to develop or measure their outcomes. Instead, Commission staff reviewed the Commission's statutory mandates, the rules currently in effect in its other regulatory frameworks and looked at how other jurisdictions approached the topics in these rules.

**12. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?**

*Alternative regulations may include performance-based regulations, which define the*



*required outcome, but do not dictate the process the regulated stakeholders must use to comply.*

In reviewing these statutes and rules, staff considered past practices of the Commission in its other regulatory frameworks, any stakeholder comments, and the current trends in the sports gaming regulatory environment. As such, these rules are a conglomeration of the rules used in other jurisdictions with adaptations made for Ohio law and current industry trends.

The Commission adopted an alternative regulation by allowing for the exact implementation choice to be made by the licensee, and allowing for potential new technologies and ideas to be permitted as approved by the Executive Director.

**13. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?**

This question largely does not apply to these rules because no other regulations in these areas currently exist with respect to sports gaming.

**14. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.**

The Commission ensures any issues that arise are funneled through the respective division director and vetted with the Legal Division before being brought to the Executive Director, so that he can coordinate a consistent response and have staff conduct outreach to the regulated community. Specifically, those issues related to licensing are handled by the Commission's licensing staff, which is overseen by a single director in the Commission's central office. And any issues related to compliance are managed by the Commission's compliance staff, again overseen by a single director in the Commission's central office. Moreover, the issuance, denial, or sanctioning of any license (other than the issuance of provisional licenses) can only be approved by the Commission at a public meeting through a vote. Therefore, the regulated community can expect consistent and transparent licensing and compliance decisions.

**Adverse Impact to Business**

**15. Provide a summary of the estimated cost of compliance with the rule(s). Specifically, please do the following:**  
**a. Identify the scope of the impacted business community, and**

The regulated business community consists of all persons who may conduct sports gaming in Ohio, including proprietors, services providers, suppliers, or employees. These include Ohio's professional sports teams and events, casinos and racinos, as well as, gaming-related supply or service companies, and sportsbook operators. Specifically, this rule impacts sports gaming proprietors that utilize online sports gaming accounts.

- b. Quantify and identify the nature of all adverse impact (e.g., fees, fines, employer time for compliance, etc.).

*The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a representative business. Please include the source for your information/estimated impact.*

**3775-16-03 “Sports gaming accounts.” (Amend)**

The Commission anticipates an adverse business impact from this rule. These costs will vary based on the sports gaming proprietor’s business, the types of accounts proprietors decide to allow, and the procedures proprietors institute to implement the rule. However, the requirement for sports gaming proprietors to have accounts through which wagers are to be placed is statutorily required by R.C. 3775.11 and further elucidated in R.C. 3775.12 when describing funded or deposit-enabled accounts, where the proprietor holds funds in a digital wallet on behalf of the patron. Most of the requirements in the rule ensure accounts are only created by, and are verified as only being used by, of-age individuals who are not otherwise prohibited from gaming (e.g. athletes, VEPs, etc). These requirements, again, are made to comport with the statute and build off other state’s requirements for accounts. Finally, there are further security and identity requirements for deposit-enabled or funded accounts, ensuring those accounts, and the patron money in them, are more fully protected and promptly paid. Again, those requirements are common in the industry and include important problem gambling protections including allowing patrons to engage in personalized limit setting. The amendment to this rule requires the sports gaming proprietor to utilize multi-factor authentication which will create increased costs for those proprietors who do not already implement such feature. These costs, which will take the form of system builds and upkeep, are again statutorily authorized and common in the industry for account-based wagering.

16. Are there any proposed changes to the rules that will reduce a regulatory burden imposed on the business community? Please identify. (*Reductions in regulatory burden may include streamlining reporting processes, simplifying rules to improve readability, eliminating requirements, reducing compliance time or fees, or other related factors*).

Not applicable.

17. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The regulatory intent justifies any adverse impact because R.C. 3775 requires the Commission to ensure the integrity of sports gaming, specifically by licensing, regulating, investigating, and penalizing those involved in sports gaming in a manner consistent with the Commission’s

authority to do the same with respect to casino gaming. Moreover, the R.C. 3775 gives the Commission broad authority to adopt rules that cover topics such as licensure, required procedures, and proprietor duties. As such, any business impact is justified as statutorily contemplated and inherent in the business of sports gaming.

Moreover, the regulatory intent justifies any adverse impact because sports gaming is a highly regulated industry and is accustomed to detailed regulations in every jurisdiction. Unregulated gaming poses a threat to public welfare and raises the potential for fraud and abuse. To mitigate these threats, the Commission, like other gaming regulatory bodies, is using its regulatory authority to establish a best practice framework in consultation with the regulated community.

### **Regulatory Flexibility**

#### **18. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.**

Yes, these rules provide exemption or alternative means of compliance through Ohio Adm. Code 3775-1-04 (as pending), which permits the Commission, upon written request, to grant waivers and variances from the rules adopted under R.C. Chapter 3775, including these rules, if doing so is in the best interest of the public and will maintain the integrity of sports gaming in the State of Ohio

#### **19. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?**

To the extent R.C. 119.14 would apply to a violation of these rules, the Commission will provide verbal and written notification to the small business to correct the paperwork violation. Thereafter, the Commission would allow the small business a reasonable amount of time to correct the violation. The Commission and its staff would also offer any additional assistance necessary to aid in remediation of the violation. No administrative action would be taken unless the small business fails to remedy the violation within the reasonable time allotted by the Commission.

#### **20. What resources are available to assist small businesses with compliance of the regulation?**

The Commission and its staff are dedicated to working with members of the regulated community, and the public, to regulate sports gaming effectively and efficiently in this state. As a result, the following resources are available:

- Commission's mailing address: 100 E. Broad St., 20<sup>th</sup> Floor, Columbus, OH 43215
- Commission's toll-free telephone number: (855) 800-0058
- Commission's fax number: (614) 485-1007
- Commission's sports gaming website: <https://casinocontrol.ohio.gov/licensing-renewal/02-sports-gaming>
- Commission's email: [info@casinocontrol.ohio.gov](mailto:info@casinocontrol.ohio.gov)

- Commission's sports gaming listserv:  
<https://casinocontrol.ohio.gov/sportsgaming.aspx>

**From:** [Ohio Casino Control Commission](#)  
**To:** [Kerscher, Martin](#)  
**Subject:** Sports Gaming Rule for Comment  
**Date:** Tuesday, January 16, 2024 4:36:23 PM

---

[View this email in your browser](#)

Logo



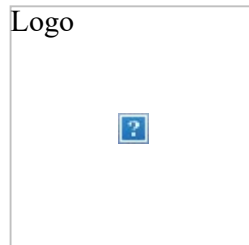
Sports Gaming Stakeholders,

The Commission is proposing an amendment to one Sports Gaming rule: Ohio Adm. Code 3775-16-03, Sports Gaming Accounts. The change is intended to streamline and update regulatory language related to multi-factor authentication. The proposed version of this rule can be found [here](#).

As always, please feel free to forward this communication to anyone else you think may be interested in this rule. Additionally, anyone may sign up for the Commission's sports gaming listserv themselves [here](#). If you would like to unsubscribe from this listserv, you may do so using the link located at the bottom of this email.

We understand that you may have questions or would like additional information before commenting, and if that is the case, we encourage you to reach out to your normal contacts at the Commission or to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) at your earliest convenience. If, in the end, you would like to provide written comments, please email them to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) by **5:00pm January 26**.

While you will have some additional chances to comment on these rules, including when they are filed with the state's Common Sense Initiative Office, please note that it is much easier for the Commission and for stakeholders to work out any questions or comments directly before the rules start the formal rule filing process.



*Copyright (C) 2024 Ohio Casino Control Commission. All rights reserved.*  
You are receiving this email because you signed up for sports gaming updates.

Our mailing address is:  
Ohio Casino Control Commission 100 E. Broad St 20th Floor COLUMBUS, OH 43215 USA

Want to change how you receive these emails?  
You can [update your preferences](#) or [unsubscribe](#)

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not

click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.



Email Address	First Name	Last Name
hr@casinocontrol.ohio.gov	Judith	Schember
dylanwilkerson4@gmail.com	Dylan	Wilkerson
nhock@brookspierce.com	Noah	Hock
matteberling@sternadvertising.com	Matt	Eberling
daniel.rainieri@betmgm.com	Dan	Rainieri
fpakish1012@sbcglobal.net	Frank	Pakish
lcox@rushstreetinteractive.com	Laura	McAllister Cox
shutchison@mgmnorthfieldpark.com	Sean	Hutchison
hmacmurray@msslawgroup.com	Helen	Mac Murray
dflowers@goldstrike.com	David	Flowers
scott.frost@lottery.ohio.gov	Scott	Frost
allysonmiller@jackentertainment.com	Allyson	Miller
amychristie@commonwealth-gaming.com	Amy	Christie
frederik@beuk.biz	Frederik	Beuk
steven.berk@gianteagle.com	Steven	Berk
aluckie@onecomply.com	Austin	Luckei
jeff@937law.com	Jeff	Ferguson
danny.crook@hardrockdigital.com	Danny	Crook
mattslovin@gmail.com	Matt	Slovin
sbrody@fubo.tv	Steven	Brody
cbliss@det.mgmgrand.com	CINDY	BLISS
hangovers1@aol.com	JOSEPH	SLAGLE
jim@theridgegolf.com	James	Cox
dandodd@zhfconsulting.com	Dan	Dodd
Larry.Henry@gdcgroup.com	Larry	Henry
muething@fccincinnati.com	Paula	Boggs Muething
mark.williams@tax.state.oh.us	Mark	Williams
josh.mehta@fanduel.com	Josh	Mehta
kastevens@foxrothschild.com	Kerry	Stevens
legal@darkside.media	Effraim	Nauri
gary@casinocity.com	Gary	Trask
communications@casinocontrol.ohio.gov	Jessica	Franks
tim@rtsports.com	TIMOTHY	JENSEN
patrick.tarnay@betmgm.com	patrick	tarnay
eric.skalski@betfred.com	Eric	Skalski
dheyman@zhftaxlaw.com	Derek	Heyman
stmelectricllc@gmail.com	steve	Minnielli
milan.karna@mha.ohio.gov	Milan	Karna
marystone@google.com		
fbarroga@caesars.com	Floyd	Barroga
prevention@hopeinfoستoria.com	Ronele	Myers
srustica@gmail.com	SHEILA	ABAD
Nathan.Wright@tax.state.oh.us	Nathan	Wright
aandark@gmail.com	Mark	Williamson
Andromeda.Morrison@casinocontrol.ohio.gov	Andromeda	Morrison
nathan.shaver@tn.gov	Nathan	Shaver

gfinan@draftkings.com  
eric.snider@lotterync.net  
nadersmn@gmail.com  
management@didjos.com  
jukeboxcle@gmail.com  
matt.schoch@catenamedia.com  
dana.reising@toledo.oh.gov  
mark.elliott@markelliottradio.com  
kyledavis1122@gmail.com  
pmartin@mgmresorts.com  
kgsstr@yahoo.com  
Georgina.Finch@bet365.com  
nsquires@delawarenorth.com  
complianceregreview@igt.com  
trevor.mauck@bakermckenzie.com  
jhochman@covers.com  
psicuso@boselaw.com  
ltheros@det.mgmgrand.com  
doug@pscoho.com  
jonathan.brook@kambi.com  
hboyden@draftkings.com  
Koned.Jackson@tipico.us  
matt.h@jjventures.com  
steven.heckenluber@pngaming.com  
Jayme.McCall@casinocontrol.ohio.gov  
jgleason@gleasonlawofficellc.com  
smleopold@duanemorris.com  
ken.litwak.2@gmail.com  
Matthew.waters@catenamedia.com  
jromero-villanueva@hobbsstrauss.com  
roger.bryant@mvgrllc.com  
jobryant@cjrgroup.net  
nickw1825@gmail.com  
tara.jones@intralot.us  
t.smith@sportradar.com  
david@gslawohio.com  
lynn.handler@catenamedia.com  
lwithey@americangaming.org  
lsauer@superbook.com  
bill.speros@gdcgroup.com  
Steve.Kastner@igt.com  
gaungst@brunswick.oh.us  
ted.nussman@cincinnati-oh.gov  
daniel.monk@wcpo.com  
alissa.naylor@betmgm.com  
chad@thebatchco.com  
fivedogsllc@yahoo.com

Griffin  
Eric  
Nader  
Jake  
Alex  
Matt  
Dana  
Mark  
Kyle  
Patrick  
Kevin  
Georgina  
Neil  
Carrie  
Trevor  
Jared  
Philip  
Louis  
Doug  
Jonathan  
Heidi  
Koned  
Matthew  
Steven  
Jayme  
John  
Scott  
Ken  
Matthew  
Jordan  
roger  
Jay  
Nicholas  
Tara  
Tracy  
david  
Lynn Marie  
LaVonne  
Larry  
WILLIAM  
Steve  
Grant  
Ted  
Dan  
Alissa  
Chad  
Eric

Finan  
Snider  
Nazemi  
Didion  
Budin  
Schoch  
Reising  
Elliott  
Davis  
Martin  
Smith  
Fnch  
Squires  
Porterfield  
Mauck  
Hochman  
Sicuso  
Theros  
Talbot  
Brook  
Boyden  
Jackson  
Hortenstine  
Heckenluber  
McCall  
Gleason  
leopold  
Litwak  
Waters  
Romero-Villanueva  
bryant  
O'Bryant  
Wood  
Jones  
Smith  
jansky  
Handler  
Withey  
Sauer  
SPEROS  
Kastner  
Aungst  
Nussman  
Monk  
Naylor  
Hawley  
Kacvinsky

nweiss@cleguardians.com  
jake.williams@pointsbet.com  
danny.dirienzo@geocomply.com  
michelle.buckler@hrccincinnati.com  
bwilmers@jdscompanies.com  
joe.scalzo@crain.com  
adam@angeltooth.com  
heather.sharpe@pngaming.com  
samuel.porter@icemiller.com  
marita.navarro@bet365.com  
JohnAckworth@aol.com  
MEW@rhcholdings.com  
john@corridordc.com  
debra.jobes@regology.com  
jessica.franks@casinocontrol.ohio.gov  
Natalie.Malloy@unitedtote.com  
truwest727@yahoo.com  
Bryangladden@icloud.com  
linda@casinosoftusa.com  
Twochicksandapie@gmail.com  
Zahra@preserveagency.com  
magictreerudy@gmail.com  
Clay.Gordon@10tv.com  
akremer@taftlaw.com  
ryan.hemingsen@betfred.com  
jjiloty@nascar.com  
kristal.rovira@trustly.com  
cory.simmons@pngaming.com  
rgonsalves@gameaccount.com  
tloc3210@gmail.com  
reedcarlvonmehren@jackentertainment.com  
mway@graydon.law  
platinumjayn@yahoo.com  
tbowen@ohiorestaurant.org  
john.oberle@icemiller.com  
legal.us@bettercollective.com  
alogiudice@saiber.com  
tristicah@simplebet.io  
rob.borm@hofvillage.com  
aleksandar.gajic@kambi.com  
martin.kerscher@casinocontrol.ohio.gov  
stevex@amazon.com  
mzatezalo@keglerbrown.com  
gary.dewitt@mvgrllc.com  
kittys14sport@gmail.com  
afleischer@google.com  
maile.keliikoa@betfred.com

Neil  
Jake  
Danny  
Michelle  
Brian  
Joe  
Adam  
Heather  
Sam  
Marita  
John  
Melissa  
John  
Debra  
Jessica  
Natalie  
trudy  
Bryan  
Linda  
Stephanie  
Zahra  
John  
Clay  
Anne  
Ryan  
Jordan  
Kristal  
Cory  
Ren  
Tony  
Reed  
Matthew  
Jay  
Tod  
John  
Kyra  
Ariana  
Tristica  
Rob  
Aleksandar  
Martin  
Stephen  
Michael  
Gary  
Billy  
Andrew  
Maile

Weiss  
Williams  
DiRienzo  
Buckler  
Wilmers  
Scalzo  
Avery  
Sharpe  
Porter  
Navarro  
Ackworth  
Wideman  
Pappas  
Jobes  
Franks  
Malloy  
west  
Gladden  
Tobin  
Minor  
Emamhosseini  
Rudy  
Gordon  
Kremer  
Hemingsen  
Jiloty  
Rovira  
Simmons  
Gonsalves  
Cooper  
von Mehren  
Way  
Nelson  
Bowen  
Oberle  
Pulliam  
LoGiudice  
Howard  
Borm  
Gajic  
Kerscher  
Exley  
Zatezalo  
DeWitt  
Watson  
Fleischer  
Keliikoa

danielle.boyd@hardrockdigital.com  
jason.culek@lottery.ohio.gov  
pcross@brookspierce.com  
dale.bischoff@casinocontrol.ohio.gov  
inboundcontent@regology.com  
jared.goffinet@fox19now.com  
christina.brooks@goldrushgaming.com  
joe.caputi@betprophet.co  
michael.baxter@intralot.us  
mid1834tav@yahoo.com  
jehrenfeld@blueocean.com  
tbaugh@cleguardians.com  
scott.anderson@mha.ohio.gov  
brian.pratt@tipico.us  
rhenosy@buckeyelakebrewery.com  
snadeau@sightlinepayments.com  
jbierer@prevention-first.org  
jwheeler@ifrahlaw.com  
eric.ramsey@catenamedia.com  
thomas.smith@fanduel.com  
daniel.carter@lottery.ohio.gov  
danielle.frizzi-babb@lottery.ohio.gov  
morgantina16@gmail.com  
d.daniels@gaminglabs.com  
kwentz@mgmnorthfieldpark.com  
sphagan@velawoodlaw.com  
danny.cross@catenamedia.com  
elise@capitoledgeco.com  
mthevenot@bhfs.com  
matthew.king@pointsbet.com  
aliffconnie@gmail.com  
kcochran@draftkings.com  
steven.johnson6@gmail.com  
lricksy@taftlaw.com  
charliep@fb.com  
matthewmcauliffe@kpmg.com  
charles.lopresti@lottery.ohio.gov  
cjhuda@gmail.com  
jess.stewart304@gmail.com  
bstrickland@sis.tv  
jack.pugliese@fanduel.com  
adam@brewfontaine.com  
randybeals@gmail.com  
lschirm@idology.com  
cdesarro@hotmail.com  
shahrp@gmail.com  
emma.cowley@img.com

Danielle  
Jason  
Patrick  
Dale  
Debra  
Jared  
Christina  
Joe  
Michael  
Jason  
Jonathan  
Ted  
Scott  
Brian  
Rich  
Shannon  
Jennifer  
Jackson  
Eric  
Thomas  
Dan  
Danielle  
tina  
Dave  
Kyle  
Shena  
Danny  
Elise  
Melissa  
Matthew  
Connie  
Kevin  
Steve  
LeRoy  
Charlie  
Matthew  
Charles  
Chris  
Jess  
Brenda  
Jack  
Adam  
Randall  
Laurie  
chris  
Raj  
Emma

Boyd  
Culek  
Cross  
Bischoff  
Jobes  
Goffinet  
Brooks  
Caputi  
Baxter  
Harter  
Ehrenfeld  
Baugh  
Anderson  
Pratt  
Hennosy  
Nadeau  
Bierer  
Wheeler  
Ramsey  
Smith  
Carter  
Frizzi-Babb  
morgan  
Daniels  
Wentz  
Phagan  
Cross  
Geig  
Thevenot  
King  
Aliff  
Cochran  
Johnson  
Rickys  
Patterson  
McAuliffe  
LoPresti  
Huda  
Stewart  
Strickland  
Pugliese  
Rammel  
Beals  
Schirm  
desarro  
Shah  
Cowley

jlang@calfee.com  
zack.carreon@cinradio.org  
jnugent@foxrothschild.com  
gregoryledet@gmail.com  
kelly.gregor@tax.state.oh.us  
omar.fakhouri1@gmail.com  
ljs@wowway.com  
nick@zwillgen.com  
meghan.lacorte@underdogfantasy.com  
gzochodne@covers.com  
heather@heatherscoffeeandcafe.com  
dhestermann@caesars.com  
vaguerrieri@gmail.com  
dave@boomment.com  
sealerman1@adelphia.net  
sharkz23@aol.com  
rodney@cooksmithcpas.com  
mjones@foxrothschild.com  
babbott45@hotmail.com  
Trobinson@gan.com  
r.hoffman@draftkings.com  
nstapleton@caesars.com  
hkamen@advancelocal.com  
t.key@elysgame.com  
norrison@betparx.com  
aafrazier@restaurant.org  
gary@ribackamedia.com  
stefensloane@gmail.com  
parrym@ballardspahr.com  
jennifer.roberts@wynnbet.com  
porter@michgovstrategy.com  
bwillard@gbq.com  
densinger@gongwer-oh.com  
tsr@mccarthylebit.com  
steve@odmbbq.com  
westonamiller@gmail.com  
n-funderburg@mffg.net  
kosich@wews.com  
rdove@attorneydove.com  
amc@stateside.com  
johnw@ufpm.net  
jlimun@mgmresorts.com  
sward@orrick.com  
jeremy.kolman@betmgm.com  
bfischer@orrick.com  
schlouch@rushstreetinteractive.com  
charles.dwaileebe@livech.com

James  
Zack  
Julie  
Gregory  
Kelly  
Omar  
Lawrence  
Nicholas  
Meghan  
Geoff  
Heather  
Dean  
Vince  
Dave  
James  
Laura  
Rodney  
Marie  
Brett  
Tina  
Becky  
Neil  
Howard  
Tory  
Nick  
Aaron  
Gary  
Stefen  
Maren  
Jennifer  
Aaron  
Benjamin  
Dustin  
Tyler  
Steve  
Weston  
Nathaniel  
John  
ROBERT  
Amy  
John  
Jeremy  
Scott  
Jeremy  
Bradley  
Zachary  
Charlie

Lang  
Carreon  
Nugent  
Ledet  
Gregor  
Fakhouri  
Scullin  
Jackson  
La Corte  
Zochodne  
Sukola  
Hestermann  
Guerrieri  
Behr  
Frank  
Scullin  
Cook  
Jones  
Abbott  
Robinson  
Hoffman  
S  
Kamen  
Key  
Orrison  
Frazier  
Garry  
Sloane  
Parry  
Roberts  
Porter  
Willard  
Ensinger  
Renners  
  
Miller  
Funderburg  
Kosich  
DOVE  
Cole  
Winters  
Limun  
Ward  
Kolman  
Fischer  
Schlouch  
Dwaileebe

nathan.dodd@bet365.com  
stephen.schrier@blankrome.com  
ldlevenson@cooperlevenson.com  
marina.king@tax.state.oh.us  
rockets2mars@gmail.com  
adam@govsolgrp.com  
alex@betfanatics.com  
cspada@pgnohio.org  
jgrad@henselgrad.com  
emiyagishima@nascar.com  
vguveiyian@gan.com  
ric@governmentedge.com  
toconnell@reds.com  
cmacmac@aol.com  
neil.walsh@hardrockdigital.com  
mitchellmark2@gmail.com  
liv.biesemans@kindredgroup.com  
jcalcamu@gmail.com  
Pharbin@fanatics.com  
r.mcadoo@gaminglabs.com  
acrisovan@det.mgmgrand.com  
andy.kostival@sundaycreekhorizons.com  
hoosier3232@gmail.com  
maxwell.smith@cincinnati-oh.gov  
matt@CHWadvisors.com  
cody.fitch@tax.state.oh.us  
tyler@jockmkt.com  
deldredge@hannah.com  
cverich@ohiobrewing.com  
marcedelman@aol.com  
asitia.richardson@tax.state.oh.us  
jdeleone@deleoneassociates.com  
david.bretnitz@kambi.com  
todonnell@dickinsonwright.com  
tspickerman@caesars.com  
megan.scharf@tipico.us  
rachel.kasper@pointsbet.com  
davidmiller@pgatourhq.com  
perryriddickii@gmail.com  
LUtz@delawarenorth.com  
f.marina@elysgame.com  
hannah.kennish@playtech.com  
joegambish@gmail.com  
bspringhetti@wyncroftstrategies.com  
contact@usintegrity.com  
msinnott@vsin.com  
cpresjak@aol.com

Nathan  
stephen  
Lloyd  
Marina  
Michael  
Adam  
Alex  
Claire  
Joseph  
Edward  
Vicki Lynn  
Ric  
Tim  
Christopher  
neil  
Mark  
Liv  
Jeff  
Pam  
Robert  
Abby  
Andy  
donald  
Maxwell  
Matthew  
Cody  
Tyler  
Danny  
Chris  
Marc  
Asitia  
Jeff  
David  
Terrence  
Tina  
Megan  
Rachel  
David  
Perry  
Lauren  
Flavio  
Hannah  
Joe  
Blake  
Cheyne  
Mike  
Carol

Dodd  
schrier  
Levenson  
King  
Breen  
hewit  
Smith  
Spada  
Grad  
Miyagishima  
Guveiyian  
Baird  
OConnell  
Macrides  
walsh  
Mitchell  
Biesemans  
Calcamuggio  
Harbin  
McAdoo  
Crisovan  
Kostival  
emmons  
Smith  
Carle  
Fitch  
Carlin  
Eldredge  
Verich  
Edelman  
Richardson  
DeLeone  
Bretnitz  
ODonnell  
Spickerman  
Scharf  
Kasper  
Miller  
Riddick  
Utz  
Marina  
Kennish  
Gambish  
Springhetti  
Redenius  
Sinnott  
Young

llewellyn@rushstreetinteractive.com  
spencer@highbridgeco.com  
teresarodgers@jackentertainment.com  
etully@aicuo.edu  
SXIA@CAVS.COM  
wjb316@gmail.com  
doug@fos.company  
gregory.stewart58@gmail.com  
jmiddleton@williamhill.us  
sara.tait@icemiller.com  
Elizabeth.Schorr@jfs.ohio.gov  
cquinn@cleveland.com  
sdonaldson@wcmh.com  
s.may@gaminglabs.com  
brian.fried@fanduel.com  
lemon@rushstreetinteractive.com  
brich300@sbcglobal.net  
jarrod@casinocity.com  
fdg.oh.compliance@fanduel.com  
meredyth.romalis@playup.com  
cmiller@foxrothschild.com  
mforney@deleoneassociates.com  
Kristen.Hannaforde@53.com  
brendan@sharprank.com  
rneville@reds.com  
jallen@williamhill.us  
handzo@rushstreetinteractive.com  
oburris@pghohio.org  
chris.winslow@opusnext.com  
cdanburg@cleguardians.com  
amademan78@gmail.com  
dpollock@tegrna.com  
ttywang@haslamsports.com  
cbennett@cjlwapolicy.com  
schoolbusdriverbill@yahoo.com  
scott.basom@lottery.ohio.gov  
Zachary.silverberg@wellsfargo.com  
megan.ash-koebert@betmgm.com  
johnmackewich@mackewich.com  
megan.otieno@betfanatics.com  
abakaletz@gmail.com  
tarunksh@yahoo.com  
david.paragas@btlaw.com  
stevebittenbender@gdcgroup.com  
clovett@mgmnorthfieldpark.com  
JKEDROWSKI@MGMRESORTS.COM  
julia.meleshkova@geocomply.com

Jim  
Spencer  
Teresa  
Emily  
Summer  
Wes  
Doug  
Gregory  
Jill  
Sara  
Elizabeth  
Chris  
Sarah  
Steve  
Brian  
Andy  
Brian  
Jarrod  
FanDuel Regulatory Cc  
Meredyth  
claudette  
Matthew  
Kristen  
Brendan  
Rick  
james  
Todd  
Olivia  
Chris  
Curtis  
Justin  
Diana  
Ted  
Claire  
Bill  
Scott  
Zachary  
Megan  
John  
Megan  
Alex  
Tarun  
David  
Steve  
Cash  
James  
Julia

Llewellyn  
Gross  
Rodgers  
Tully  
Xia  
Burns  
Greenberg  
Stewart  
Middleton  
Tait  
Schorr  
Quinn  
Donaldson  
May  
Fried  
Lemon  
Rich  
LeBlanc  
FanDuel Regulatory Communication  
Romalis  
miller  
Forney  
Hannaforde  
Logan  
Neville  
Allen  
Handzo  
Burris  
Winslow  
Danburg  
Maucione  
Pollock  
Tywang  
Bennett  
Frank  
Basom  
Silverberg  
Ash-Koebert  
Mackewich  
Otieno  
Bakaletz  
Kumar  
Paragas  
Bittenbender  
Lovett  
Kedrowski  
Meleshkova



normanfrenette@yahoo.com	Norman	Frenette
millsap@rushstreetinteractive.com	Lani	Millsap
accounts@rmdportfolios.com	Rocky	Brennan
cameron@onecomply.com	Cameron	Conn
kpamir@novomaticamericas.com	Kemal	Pamir
kacincione@vorysadvisors.com	Karen	Cincione
christine.m.bordeaux@gmail.com	Christine	Bordeaux
jenny.mclauchlan@sccgmanagement.com	Jenny	McLauchlan
angela.mcnair@tax.state.oh.us	Angela	McNair
madison@chwadvisors.com	Madison	Whalen
jschmitz@gameaccount.com	Julie	Schmitz
loneill@mgmresorts.com	Lea	O'Neill
mcarey@vixio.com	Matt	Carey
katherine.sayre@wsj.com	Katherine	Sayre
john@skyboxsportsnetwork.com	John	Jost
stevecocca@sbcglobal.net	Steve	Cocca
ajburke@kent.edu	Amanda	Burke
john@trimacadvisors.com	John	McClelland
mjalandoni@flannerygeorgalis.com	Matthew	Jalandoni
ryan@mckinleystategies.com	Ryan	Stenger
Jennifer.Shaffer@casinocontrol.ohio.gov	Jenn	Shaffer
justin.black@gamesys.com	Justin	Black
xfmtra92@gmail.com	Frank	
editorduren@gmail.com	J.R.	Duren
joseph.volpi@lottery.ohio.gov	Joseph	Volpi
dittoe@highbridgeco.com	Mike	Dittoe
kevinjthobe@gmail.com	Kevin	Thobe
agarrett@thebeaconjournal.com	Amanda	Garrett
mstarr@superbook.com	Mark	Starr
agray@saiber.com	Amanda	Gray
ruby.miller@digitalgamingcorp.com	Ruby	Miller
mathew.jackson@bassettsmarket.com	Mathew	Jackson
dageorge@bellmusicco.com	David	George
shawn@nelsongovernmentstrategies.com	Shawn	Nelson
hgensler@voicenet.com	Howard	Gensler
thaines@dailystandard.com	Tom	Haines
michiko.nozawa-joffe@twinspires.com	Michiko	Nozawa-Joffe
brownr2020@outlook.com	Ronald	Brown
mtkeilholz@hotmail.com	Mike	Keilholz
emma.olsson@kambi.com	Emma	Olsson
mcorbett@calfee.com	Maryellen	Corbett
mostrowski@ohiobar.org	Margaret	Ostrowski
cory.brown@casinocontrol.ohio.gov	Cory	Brown
andrewashby@jackentertainment.com	Andy	Ashby
Aleah.Page@casinocontrol.ohio.gov	Aleah	Page
alicia.hughes@catenamedia.com	Alicia	Hughes
mcerrezuela@adamhfranklin.org	Monica	Cerrezuela

lauren.lemmer@betfanatics.com	Lauren	Lemmer
james.gazzale@catenamedia.com	James	Gazzale
steve.bittenbender@gdcgroup.com	Steve	Bittenbender
lalgout@sapphirerisk.com	Leo	Falgout
AnnaMarin.Russell@casinocontrol.ohio.gov	Anna Marin	Russell
zach.farber@underdogfantasy.com	Zach	Farber
mcbills1955@gmail.com	Rahul	Patel
kimberly.yuhl@catenamedia.com	Kimberly	Yuhl
pdurbak@ohiocatholicfcu.com	Paul	Durbak
ANDREA.SOUSA@BETMGM.COM	ANDREA	SOUSA
jacqueline.vokoun@playup.com	Jacks	Vokoun
jessica.gianduso@betmgm.com	Jessica	Gianduso
matthew.bryant@openbet.com	Matthew	Bryant
amanda.holi@tipico.us	Amanda	Holi
jbarkly@gmail.com	John	Barkly
carla.reeves@lottery.ohio.gov	CARLA	REEVES
andrew.silver@twinspires.com	Andrew	Silver
Shawn.Drummond@pngaming.com	Shawn	Drummond
spencer.hayes@betfred.com	Spencer	Hayes
joshua.croup@13abc.com	Josh	Croup
nicholson@rushstreetinteractive.com	Tommy	Nicholson
steve.pastorino@bhnetwork.com	Steve	Pastorino
rmclaughlin@woh.com	Robert	McLaughlin
chuck@theblasdelgroup.com	Charles	Blasdel
vilma.farrar@betfred.com	Vilma	Farrar
Cristiane.Fernandes@bhnetwork.com	Cristiane	Fernandes
abibisi@walterhav.com	Alexander	Bibisi
shensel@henselgrad.com	Susan	Hensel
daveallen84@yahoo.com	David	Allen
Bruce.Band@massgaming.gov	Bruce	Band
nlarson@recres.org	Nora	Larson
charlesh.knight@gmail.com	Charles	Knight
danielsj@caesars.com	Jana	Daniels
stephen.krombolz@tipico.com	Stephen	Krombolz
rgiden@ekgamingllc.com	Rebecca	Giden
charlie.horner@sbcgaming.com	Charlie	Horner
kyle.palmer@hrccincinnati.com	Kyle	Palmer
npeinado@gan.com	Noemi	Peinado
kathleen.lenhardt@pngaming.com	Kathleen	Lenhardt
Jason@McKinleyStrategies.com	Jason	Paduchik
marsha.brusgard@digitalgamingcorp.com	Marsha	Brusgard
quentin.turner@tax.state.oh.us	Quentin	Turner
edward.dusenberry@tax.state.oh.us	Eddie	Dusenberry
m-rogers.3@onu.edu	Michael	Rogers
jkilsby@vixio.com	James	Kilsby
mnorton@farmersstate-oh.com	Melanie	Norton
brylin.abrahams@digitalgamingcorp.com	Brylin	Abrahams

rob.oconnor@betmgm.com  
JKLEIMAN@SAIBER.COM  
julien.philippart@gaming1.com  
msenn@Superbook.com  
Pat.McLoone@gdcgroup.com  
michael.speciale@betmgm.com  
hwafer@superbook.com  
jjarmbru@ameritech.net  
abartlett@boselaw.com  
jess.panora@betmgm.com  
sbond@brouse.com  
elena.kvakova@internetvikings.com  
s.maldonado@elysgame.com  
k.roche@draftkings.com  
jake.garza@catenamedia.com  
kcopp@taftlaw.com  
nkay@fluentricciardi.com  
Kevin@CapCityStratCom.com  
lizzmatheson@gmail.com  
sdalsheim@ifrahlaw.com  
Eric.Lawrence@bet365.com  
mshepro@haslamsports.com  
backyardbar1@aol.com  
corey.roepken@catenamedia.com  
jwidmer@cincinnati.bbb.org  
michael.crawford@hofvillage.com  
doughbarnette@westfieldgrp.com  
mwest@boselaw.com  
bdavis@shafferentertainment.com  
chubby24@att.net  
jennifer.mcfarland@tax.state.oh.us  
robert.wamsley@hrccincinnati.com  
denise.amick@pngaming.com  
bpvinc@gmail.com  
justin@compliant.com  
tom@tompappas.com  
jlist@draftkings.com  
emily.wendel@lsc.ohio.gov  
christian.martino@betmgm.com  
rachel.hargreaves@bet365.com  
dustin@underdogfantasy.com  
jyarnell@hahnlaw.com  
dkrisch@foxrothschild.com  
bsmith@taftlaw.com  
mkoppitch@bricker.com  
smcdonnell@cleveland.com  
plovins@bluejackets.com

Rob  
Jeremy  
Julien  
Meagen  
Pat  
Michael  
Hal  
Jeff  
Alexandra  
Jess  
Stephen  
Elena  
Stephen  
Krista  
Jake  
Kimberly  
Nicole  
Kevin  
ELIZABETH  
Sara  
Eric  
Mary  
Cheryl  
Corey  
Jaimi  
Michael  
Doug  
Max  
Robert  
William  
Jennifer  
Robert  
Denise  
Robert  
Justin  
Thomas  
Jacob  
Emily  
Christian  
Rach  
Dustin  
Justin  
Daniel  
Bianca  
Matt  
Sean  
Peter

O'Connor  
Kleiman  
Philippart  
Senn  
McLoone  
Speciale  
Wafer  
Armbruster  
Bartlett  
Panora  
Bond  
Kvakova  
Maldonado  
Roche  
Garza  
Copp  
Kay  
Hall  
MATHESON  
Dalsheim  
Lawrence  
Shepro  
Cunningham  
Roepken  
Widmer  
Crawford  
Barnette  
West  
Davis  
Gass  
McFarland  
Wamsley  
Amick  
Elser  
Stempeck  
Pappas  
List  
Wendel  
Martino  
Hargreaves  
Cooper  
Yarnell  
Krisch  
Smith  
Koppitch  
McDonnell  
Lovins

jz@theoddsfactory.com  
jimmy@spdunn.com  
thayes@williamhill.us  
daniel.pozniak@dscadvisorsllc.com  
heath@parlaycolumbus.com  
gary@usbets.com  
michealgarrett@outlook.com  
Chinh.Nguyen@hrcincinnati.com  
cjfisher@foxrothschild.com  
toddkleisinger@icloud.com  
berena.seifert@casinocontrol.ohio.gov  
rob\_armstrong@bennett-enterprises.com  
kjk1084@gmail.com  
dbattocletti@governmentadvocates.com  
derek.helling@catenamedia.com  
khal@theadvocate.com  
Matthew.Kredell@catenamedia.com  
lou.monaco@gdcgroup.com  
jscott@mgmnorthfieldpark.com  
kstein@ulmer.com  
Simeonia.Mays@lottery.ohio.gov  
jrubin@cjrgroup.net  
trever.wright@uc.edu  
martin@coollaw.com  
greg@byersminton.com  
Reshenbaugh@capitoladvocates.net  
andy@westmeyerdental.com  
matt.schuler@casinocontrol.ohio.gov  
thefoundrysalem@gmail.com  
craig.robinson@mvgrrllc.com  
oliver.clarke@bet365.com  
rgmorg@att.net  
dtj513@yahoo.com  
Tess.Dusenberry@tax.state.oh.us  
catherine.lanham@ecoesc.org  
will@acutus.llc  
clm314@aol.com  
symone.nelson@betfanatics.com  
Gregory.Brooks@pngaming.com  
tinaburbacher@outlook.com  
dpc@pacainc.com  
kfpblackforest@gmail.com  
Alan.Moore@tax.state.oh.us  
npervaiz@recres.org  
erika.dinapoli@bmm.com  
christian.peterson@sportshubtech.com  
christine.l.flohr@pwc.com

James  
Jimmy  
Trevor  
Dan  
Heath  
gary  
Micheal  
Chinh  
CJ  
Todd  
BERENA  
Rob  
Kevin  
David  
Derek  
Kevin  
Matthew  
Lou  
Jillian  
Kim  
Simeonia  
Josh  
Trevor  
Patrick  
Greg  
Rob  
Andrew  
Matt  
Bridget  
Craig  
Oliver  
RICHARD  
Dan  
Tess  
CATHERINE  
WILL  
Cheryl  
Symone  
Gregory  
Christina  
David  
Rick  
Alan  
Nabil  
Erika  
Christian  
Christine

Zalcman  
Wolf  
Hayes  
Pozniak  
Pontious  
rotstein  
Garrett  
Nguyen  
Fisher  
Kleisinger  
SEIFERT  
Armstrong  
Kale  
Battocletti  
Helling  
Hall  
Kredell  
Monaco  
Scott  
Stein  
Mays  
Rubin  
Wright  
Martin  
Bennett  
Eshenbaugh  
Westmeyer  
Schuler  
Rose  
Robinson  
Clarke  
MORGAN  
Martinez  
Dusenberry  
LANHAM  
GREEN  
McArthur  
Nelson  
Brooks  
Burbacher  
Corey  
King  
Moore  
Pervaiz  
DiNapoli  
Peterson  
Flohr

southgatechiroky@fuse.net  
ccampisi@bw.edu  
bigpoppatf@yahoo.com  
michael.levine@betfanatics.com  
dennis.fitzgerald@fiserv.com  
johntortora20@gmail.com  
MELISSA@COLEKEPRO.COM  
rfourke@gmail.com  
Steven.Schult@catenamedia.com  
cynthia.hays@betfred.com  
daniel.mulhall@betfanatics.com  
gabeja80@gmail.com  
robert.tablack@gmail.com  
zdavis@taftlaw.com  
jennifer.thomas@butlersnow.com  
laura.stanley@tax.state.oh.us  
cgerhardt@govstrategies.com  
dfisher@northwitt.com  
matthew.ashton@pointsbet.com  
mshuck@corpmg.net  
sportsmediaexchange@gmail.com  
Kimberly@bluelaserdigital.com  
mdavis@thesuccessgroup.com  
matthew.spitnale@pngaming.com  
bill@byersminton.com  
phil.goldfarb@tipico.com  
jdelfosse@yourpremierbank.com  
coakes@mcadamhs.org  
chudsinc@gmail.com  
Skip@LocalThyme.Pub  
ross@subworxllc.com  
mobrien@cavs.com  
deanna.pettit515@gmail.com  
cblackham@msslawgroup.com  
akhil.ghirnikar@betmgm.com  
jabady@columbusports.org  
bobc@isisports.com  
denisekalis@roadrunner.com  
activmonk@gmail.com  
cclc@roadrunner.com  
esuever@ballys.com  
ecompton@kmklaw.com  
lisapowers@jackentertainment.com  
tim.kelley@pngaming.com  
m.robbs@gaminglabs.com  
aberger@duanemorris.com  
aj@mattkallner.com

Roger  
Charles  
Antoine  
Michael  
Dennis  
John  
MELISSA  
Robert  
Steve  
Cynthia  
Daniel  
Gabriel  
Robert  
Zahki  
Jennifer  
Laura  
Chip  
David  
Matthew  
Mark  
Jill  
Kimberly  
McKenzie  
matt  
Bill  
Phil  
Jen  
Colleen  
Pete  
Skip  
Ross  
Matt  
deanna  
Walter  
Akhil  
Jason  
Bob  
Denise  
MONK  
Carl  
Elizabeth  
Emma  
Lisa  
Tim  
Mike  
Adam  
Abe

Jones  
Campisi  
Francis  
Levine  
Fitzgerald  
Tortora  
THAMMAVONGSA  
Rourke  
Schult  
Hays  
Mulhall  
Adams  
Tablack  
Davis  
Thomas  
Stanley  
Gerhardt  
Fisher  
Ashton  
Shuck  
Dorson  
Ness  
Davis  
spitnale  
Byers  
Goldfarb  
Delfosse  
Oakes  
Chudzinski  
Walker  
Holden  
OBrien  
Pettit  
Blackham  
Ghirnikar  
Abady  
Cooper  
kaliszewski  
Hines  
Kochendorfer  
Suever  
Compton  
Powers  
Kelley  
Robbins  
Berger  
Jacob

bradsmith00@icloud.com  
eandrus2@suncommunities.com  
swisneski@nabancard.com  
mary.shaffrey@catenamedia.com  
keesha.foster@casinocontrol.ohio.gov  
ssanders@gpgrhr.com  
sean@spdunn.com  
mike@ontapgrille.com  
robmiller@miller-companies.com  
robert.linnehan@xlmedia.com  
spencer@governmentedge.com  
chatfield60@gmail.com  
jpfought@gmail.com  
gm@marioncountryclub.com  
cheryl.rega@playtech.com  
ian.litherland@lottery.ohio.gov  
ahavas@thevsl.com  
atobias@cleveland.com  
thepatio1950@gmail.com  
swright@aimmediamidwest.com  
aserrao-roman@bloombergindustry.com  
afarrell@sbgvtv.com  
dspoeirl@bex.net  
marisalutz@att.net  
l.pilling@gamingintelligence.com  
Techcomply@betmgm.com  
david.danzis@catenamedia.com  
laura.burd@888holdings.com  
alexolinger1986@gmail.com  
williamallsup1@gmail.com  
rebecca.lewis@mcesc.org  
ayamson@ohiobar.org  
cmerritt@oab.org  
cakelleher@michaelbest.com  
hanes@jbhco.com  
gflanagan@parxcasino.com  
jessica.welman@sbcgaming.com  
jsyphax@preventionactionalliance.org  
mseely@bettercollective.com  
mcurtin2323@yahoo.com  
atlantafan08@outlook.com  
jbalmert@enquirer.com  
mdorf@paypal.com  
fabiusm@ballardspahr.com  
fsantoiemmo@teamweston.com  
ian.robinson@pngaming.com  
kimhelton06@gmail.com

Brad  
Edward  
Stephanie  
Mary  
Keesha  
Sydney  
Sean  
Michael  
Rob  
Robert  
Spencer  
Chris  
Justin  
Dale  
Cheryl  
Ian  
Andrew  
Andrew  
michael  
Steven  
Angelica  
Anita  
Daniel  
Marisa  
Lorien  
Todd  
David  
Laura  
alex  
William  
Rebecca  
Annie  
Christine  
Chelsea  
Jillian  
Grace  
Jessica  
James  
Mike  
Michael  
Gary  
Jessie  
Matt  
Michael  
Frank  
Ian  
Kim

Smith  
Andrus  
Wisneski  
Shaffrey  
Foster  
Sanders  
Dunn  
simms  
Miller  
Linnehan  
Wagh  
Hatfield  
Fought  
Osborn  
Rega  
Litherland  
Havas  
Tobias  
Lauletta  
Wright  
Serrano-Roman  
Farrell  
spoeirl  
Lutz  
Pilling  
Nelson  
Danzis  
Burd  
olinger  
Allsup  
Lewis  
Yamson  
Merritt  
Kelleher  
Hanes  
Flanagan  
Welman  
Syphax  
Seely  
Curtin  
Cotton  
Balmert  
Dorf  
Fabius  
Santoiemmo  
Robinson  
Helton

james@tappp.com  
geha@marshall-melhorn.com  
jamie@dyveagency.com  
daddleman@mgmresorts.com  
dastolfo@business-journal.com  
rdove@keglerbrown.com  
david@lowcountryeditorial.com  
bw3corp@gmail.com  
mhemmerle@shift4.com  
joe32077@gmail.com  
d.cash@sportradar.com  
bmraikes@yahoo.com  
rafael.verde@pngaming.com  
alan@heitnerlegal.com  
d.lobo@sportradar.com  
robyn.bowers@betmgm.com  
markets@endzin.com  
k.dawson@gamingintelligence.com  
ben.roth@fanduel.com  
kelsey.bitwinski@igt.com  
atonoli@bizjournals.com  
brett.calapp@ballys.com  
chelsea.andorka@lottery.ohio.gov  
aatanasovic@bettercollective.com  
derek.helling@playusa.com  
buzzcapital614@gmail.com  
frankedavidson@gmail.com  
info@rockcreekbar.com  
paul.stein@kambi.com  
bpreston@lnw.com  
gabrielle@geocomply.com  
tcost.trc@gmail.com  
eweiss@oddsoncompliance.com  
philip.burring@marownholdings.com  
VLFerrise@bmdllc.com  
ohiosportsbookleague@gmail.com  
stacey.frohnafel@mha.ohio.gov  
vichip@gpgrhr.com  
robert.swedinovich@pngaming.com  
tessa.metzler@casinocontrol.ohio.gov  
mbuckley@mgmresorts.com  
jtortora@bluejackets.com  
info@granarywaymedia.com  
sstoppel@novomatic.com  
sheehan@origobranding.com  
bob.moncrief@bet365.com  
muhammad.khan@bet365.com

James  
Henry  
Jamie  
Dave  
Guy  
Robert  
David  
Edward  
Mark  
Joseph  
Dawn  
Barbara  
Rafael  
Alan  
Daniel  
Robyn  
Nathan  
Kio  
Ben  
Kelsey  
Amanda  
Brett  
Chelsea  
Aleksandar  
Derek  
Ryan  
Frank  
anthony  
Paul  
Blaine  
Gabrielle  
Travis  
Eric  
Philip  
Victoria  
Randall  
Stacey  
Victor  
Robert  
Tessa  
Matt  
John  
D  
Sabine  
Sheehan  
Robert  
Muhammad

McCurdy  
Geha  
Salsburg  
Addleman  
Dastolfo  
Dove  
Caraviello  
Yaskowitz  
Hemmerle  
Lombardo  
Cash  
Taylor  
Verde  
Wilmot  
Lobo Guerrero  
Bowers  
Dodd  
Dawson  
Roth  
Bitwinski  
Tonoli  
Calapp  
Andorka  
Atanasovic  
Helling  
Fyffe  
Davidson  
grassia  
Stein  
Preston  
Angle  
cost  
Weiss  
Burring  
Ferrise  
Beals  
Frohnafel-Hasson  
Hipsley  
Swedinovich  
Metzler  
Buckley  
Tortora  
Weischadle  
Stoppel  
Hannan  
Moncrief  
Khan



nathan@neaconsultingohio.com  
christopher.boan@gdcgroup.com  
dave.morgan.oh@pm.me  
dlongmeier@pgnohio.org  
jposey@scpublichealth.com  
mbrennan@lovelandexcavating.com  
jennifer.whitehurst@huntington.com  
david.purdum@espn.com  
Susan.Christie@igt.com  
lindsay@geocomply.com  
mkosman@cleguardians.com  
todd-tracy@sbcglobal.net  
hurst.talbott@lottery.ohio.gov  
casey.flowers@hrccincinnati.com  
tykuntzypr@gmail.com  
Derek.Smith@BMM.com  
nicholas.ciofani@lottery.ohio.gov  
jessica.bullock@unitedtote.com  
nstnstapleton@caesars.com  
Deputydog9810@yahoo.com  
rlimardo@mgmresorts.com  
Joshua.kirschner@nelsonmullins.com  
jennifer.jarrell@com.ohio.gov  
steven\_husk@yahoo.com  
nikul.patel@rushstreetinteractive.com  
JBENEDICT@GOVSTRATEGIES.COM  
Brenda.McDonald@tax.state.oh.us  
iqi.note3@gmail.com  
melissa.blau@gmail.com  
director@hopeinfostoria.com  
thehoop@hotmail.com  
milliganspub@gmail.com  
kimberleyh@digitalgamingcorp.com  
mwagoner@shumaker.com  
steve.osborne@usabilitydigital.com  
tomdow@amazon.com  
monica.wilcoxen@casinocontrol.ohio.gov  
cdparagas@gmail.com  
justinremschneider@boydgaming.com  
gregory.bailey@blankrome.com  
atrumanskvor@thelcadaway.org  
lmhuddleston@gmail.com  
awkatz@amazon.com  
hanni@nouralighting.com  
adenton@robbinsfirm.com  
robert.wang@cantonrep.com  
lrankin@caesars.com

Nathan  
Christopher  
David  
Derek  
Jim  
Matthew  
Jen  
David  
Susan  
Lindsay  
Maxwell  
Todd  
Hurst  
Casey  
Tyler  
Derek  
Nicholas  
Jessica  
Neil  
Dennis  
Rick  
Joshua  
Jennifer  
steven  
Nikul  
JIM  
Brenda  
J  
Melissa  
Shelly  
Robert  
Gordon  
Kimberley  
Mark  
Steve  
Tom  
Monica  
David  
Justin  
Gregory  
Ashley  
Lauren  
Andy  
Hanni  
Alexander  
Robert  
Lisa

Aichele  
Boan  
Morgan  
Longmeier  
Posey  
Brennan  
Whitehurst  
Purdum  
Christie  
Slader  
Kosman  
Tracy  
Talbott  
Flowers  
Kuntz  
Smith  
Ciofani  
Bullock  
Stapleton  
Schaefer  
Limardo  
Kirschner  
Jarrell  
Husk  
Patel  
BENEDICT  
McDonald  
C  
Blau  
Biggert  
Kortsen  
Milligan  
Sanchez  
Wagoner  
Osborne  
Dow  
Wilcoxen  
Paragas  
Remschneider  
Bailey  
Truman-skvor  
Huddleston  
Katz  
Mahmood  
Denton  
Wang  
Rankin

skoch@draftkings.com  
brianne@consultbds.com  
grace.moat@betmgm.com  
ekirk@draftkings.com  
tablerjames476@gmail.com  
brooke.murphy@kroger.com  
michelle@ifrahlaw.com  
rmancino@ohha.com  
jeremy@fansunite.com  
amanda.rosenberg@pointsbet.com  
eric@edfcompliance.com  
angela.mccracken@lottery.ohio.gov  
ruffingconsulting@gmail.com  
ron.pottorf@tax.state.oh.us  
kbj7177@yahoo.com  
matthew.king@bet365.com  
kgarza@zepfcenter.org  
jft@ibia.bet  
jewig@civic-point.com  
jterzotis@theadvocate.com  
caty.abbott@casinocontrol.ohio.gov  
shawnstoledo@yahoo.com  
jeremywfitzgerald@gmail.com  
candyce.knowles@betmgm.com  
seahawk1258@yahoo.com  
mspitna@gmail.com  
saba.asgedom@betmgm.com  
bill.sattler@hardrockdigital.com  
tnc200394@yahoo.com  
mweinstein@graphicvillage.com  
RyanSoultz@boydgaming.com  
Joseph.meehanjr@kambi.com  
nsimon@kmklaw.com  
mholt@usintegrity.com  
juliejanczewski@gmail.com  
julio@sports-betting-consultants.com  
Catherine.DeRose@tax.state.oh.us  
jonathan@ascendantcollection.com  
nikki.llorca@chivemediagroup.com  
eddict@jackentertainment.com  
avandusen@taftlaw.com  
amonk@kplaw.com  
peter.wolff@bet365.com  
tuckerstavern@comcast.net  
raj@wright.bet  
MFEISZLI@BDO.COM  
hoyerng@miamioh.edu

Sarah  
Brianne  
GRACE  
Erika  
James  
Brooke  
Michelle  
Renee  
Jeremy  
Amanda  
Eric  
ANGELA  
Mike  
ron  
Kyle  
Matt  
Kelly  
Jason  
Joe  
Judi  
Caty  
Mike  
Jeremy  
Candyce  
Ricky  
matt  
Saba  
william  
Thomas  
Mark  
Ryan  
Joseph  
Nick  
Matthew  
Julie  
Julio  
Catherine  
Jonathan  
Nikki  
Ed  
Alexandra  
Aaron  
Peter  
Scott  
Raj  
Michael  
Nicole

Koch  
Doura-Schawohl  
Moat  
Kirk  
Tabler  
Murphy  
Cohen  
Mancino  
Hutchings  
Rosenberg  
Frank  
MCCRACKEN  
Ruffing  
pottorf  
Jones  
king  
Garza  
Foley-Train  
Ewig  
Terzotis  
Abbott  
Shroyer  
Fitzgerald  
Knowles  
Crum  
spitnale  
Asgedom  
sattler  
Chetsko  
Weinstein  
Soultz  
Meehan  
Simon  
Holt  
Janczewski  
Soriagalvarro  
DeRose  
Petrea  
Llorca  
Dick  
Van Dusen  
Monk  
Wolff  
Bornyk  
Shah  
Feiszli  
Hoyer

jolly\_michael@sbcglobal.net  
danreinhard@jackentertainment.com  
ironrick@gmail.com  
jchapman@gan.com  
tccampresort@gmail.com  
tara.charnes@hofvillage.com  
matthew.clever@lottery.ohio.gov  
Kevin.Laguerre@BetMGM.com  
hwilmarth@fantiniresearch.com  
PressReleases@casinocitytimes.com  
brianhoylive@gmail.com  
fnunez@caesars.com  
zbirnbaum@vixio.com  
hundlecj@gmail.com  
mwilson@smithillner.com  
esechrist@orrick.com  
complianceus@pointsbet.com  
mcheek@yahoosports.com  
christopherg@xavier.edu  
douglasdaydeedee@gmail.com  
john.o'brien@casinocontrol.ohio.gov  
lbriggs@fantiniresearch.com  
cpohl@mgmresorts.com  
andrewwinchell@gmail.com  
cscholvin@bluejackets.com  
W.Curtis@draftkings.com  
samalonso@mgmnorthfieldpark.com  
logan@lindsell.org  
jscott@fanatics.com  
MikeMc2017@gmail.com  
terayperry@icloud.com  
brandon.henriksen@thescore.com  
michael.maglietta@fanduel.com  
abrowning@recres.org  
matthew.barrack@betmgm.com  
thensley0422@gmail.com  
Nicolas.Soto@fanduel.com  
ashalasmith@yahoo.com  
gregory.goldberg@circasports.com  
elma.hallberg@trustly.com  
daurean.sloan@circalasvegas.com  
justin.byers@sbcgaming.com  
jaultman@beaurivage.com  
b.cipolla@draftkings.com  
csieroty@vixio.com  
amber@sleeper.app  
alapetina@vixio.com

Michael  
Daniel  
Rick  
Jennifer  
Kimberly  
Tara  
Matthew  
Kevin  
Hannah  
Jarrod  
brian  
Frank  
Zachary  
Cody  
Michael  
Erica  
Compliance  
Meredith  
Greg  
Deidre  
John  
Laura  
Chandler  
Andrew  
Cameron  
Bill  
Samantha  
Logan  
Jillian  
Michael  
Teray  
Brandon  
Michael  
August  
Matthew  
Tim  
Nicolas  
Ashala  
Greg  
Elma  
Daurean  
Justin  
Jeremy  
Bryan  
Chris  
Amber  
Allegra

Jolly  
Reinhard  
Jansen  
Chapman  
Vizineau  
Charnes  
Clever  
Laguerre  
Wilmarth  
LeBlanc  
Hoy  
Nunez  
Birnbaum  
Hundley  
Wilson  
Sechrist  
Department  
Yu  
Christopher  
Douglas  
O'Brien  
Briggs  
Pohl  
Winchell  
Scholvin  
Curtis  
Alonso  
Lindsell  
Scott  
McCormick  
Perry  
Henriksen  
Maglietta  
Browning  
Barrack  
Hensley  
Soto  
Smith  
Goldberg  
Hallberg  
Sloan  
Byers  
Aultman  
Cipolla  
Sieroty  
Dastrup  
Lapetina

andrew.winchell@betr.app  
Steven.Grenier@HOFVillage.com  
kate.machard@derivco.co.za  
sjohnson@christiansoncompanies.com

Andrew  
Steven  
Kate  
Steve

Winchell  
Grenier  
Machard  
Johnson

## Organization

### Personal

Brooks, Pierce, McLendon, Humphrey & Leonard, LLP

Stern

BetMGM

ZAK PAK INC DBA DOOG HOUSE BAR & GRILL

RUSH STREET INTERACTIVE, LP

MGM Northfield Park

Mac Murray & Shuster

MGM Resorts

Ohio Lottery Commission

Jack Entertainment

Commonwealth Gaming

Brooklands Bar, LLC

Giant Eagle

OneComply

Ferguson Legal Group LTD

Hard Rock Digital

Cincy Sports Law and Biz

fuboTV

MGM Northfield Park

1 ROGUE INC.

The Ridge Golf & Gardens

GDC Group (Gambling.com)

FC Cincinnati

Ohio Department of Taxation

FanDuel

Fox Rothschild LLP

Darkside Management Ltd.

Casino City Press

RealTime Fantasy Sports

BetMGM

Betfred Sports

Zaino Hall and Farrin LLC

Double Down Enterprises LLC

OhioMHAS

Caesars

HOPE in Fostoria

TWO SISTERS TAVERNS INC

Ohio Department of Taxation

OCCC

Sports Wagering Advisory Council

DraftKings  
North Carolina Education Lottery

DIDJOS  
1404 W 29th LLC DBA Jukebox  
Catena Media  
Toledo-Lucas County Plan Commissions  
Mark Elliott Radio

MGM  
Fraternal Order of Eagles  
bet365  
Delaware North  
IGT

Covers.com  
Bose McKinney & Evans LLP and Bose Public Affairs Group  
MGM Northfield Park  
Public Sector Consulting, LLC  
Kambi  
DraftKings  
Tipico USA Technology Inc.  
J&J Ventures Gaming of Ohio, LLC  
Penn Entertainment  
Ohio Casino Control Commission  
Gleason Law Office LLC  
Duane Morris  
John Brooks Recovery Center  
Legal Sports Report  
HSDW  
Miami Valley Gaming  
The CJR Group, Inc.

Intralot  
Sportradar  
gioffre & schroeder  
Catena Operation Ltd  
American Gaming Association  
SuperBook  
GDC Group  
IGT  
City of Brunswick Ohio - Brunswick, OH  
Cincinnati Income Tax Division  
WCPO  
BetMGM  
The Batchelder Company  
Five dogs LLC

Cleveland Guardians  
PointsBet  
GeoComply  
Hard Rock Casino

Crain's Cleveland Business

Penn Interactive - Barstool Sportsbook  
Ice Miller LLP  
bet365  
Up A Creek Bar & Grille  
Castellini Management Company  
Corridor Consulting  
Regology  
OCCC  
United Tote  
jennie may inc

Casinosoft  
Branch pizza  
Preserve Insurance Agency  
Magic Tree  
10TV  
Taft Stettinius & Hollister LLP  
Betfred Sports  
NASCAR  
Trustly, Inc.  
Hollywood Casino Columbus  
GAN

Jack Entertainment  
Graydon Head & Ritchey LLP  
Cleveland Avenue Cafe  
Ohio Restaurant Association  
Icemiller  
Better Collective USA, Inc.  
Saiber, LLC  
SimpleBet  
Hall of Fame Village  
Kambi Sweden AB  
OCCC  
AWS  
Kegler Brown Hill + Ritter  
Miami Valley Gaming  
kitty's Sport Grill LLC  
Google  
Betfred Sports



Hard Rock Digital  
Ohio Lottery Commission  
Brooks, Pierce, McLendon, Humphrey & Leonard, LLP  
OCCC  
Regology  
Gray Television  
Gold Rush Gaming  
Prophet Exchange  
Intralot  
J & T Harter Enterprises LLC  
Blue Ocean Realty, LLC.  
Cleveland Guardians  
OhMHAS  
Tipico  
Buckeye lake brewery  
Sightline Payments  
PreventionFIRST!  
Ifrah Law PLLC  
Catena Media  
FanDuel  
Ohio Lottery Commission  
Ohio Lottery  
BPOE 797 Elks Lodge  
Gaming Laboratories International LLC  
MGM Northfield Park  
Vela Wood P.C.  
PlayOhio.com  
Capitol Edge Consulting  
Brownstein Hyatt Farber Schreck LLP  
PointsBet

DraftKings Inc.  
OCCC  
Taft Law  
Meta  
KPMG  
The Ohio Lottery Commission

PGNO  
SIS Content Services Inc.  
FanDuel  
Brewfontaine  
Currently an Ohio citizen with partners planning on applying for a type B and A license.  
IDology  
a1 beverages inc.

IMG Arena US, LLC

Calfee  
Cincinnati Public Radio - WVXU  
Fox Rothschild, LLP  
BetOH.io  
Ohio Department of Taxation  
Independent  
Towne Tavern  
ZwillGen PLLC  
Underdog  
Covers  
Heathers Coffee & Cafe  
Caesars Entertainment  
Cleveland Magazine  
Boom Shakalaka, Inc.  
Frosty mug sports bar  
Towne Tavern  
Twin Lakes Golf Course and Restaurant  
Fox Rothschild, LLP  
A3designs  
GAN Limited  
DraftKings  
Caesars  
Advance Local Media  
Elys Game Technology Corp.  
betparx  
National Restaurant Assn  
Ribacka Media  
Gamewise  
Ballard Spahr  
WynnBET  
iDEA Growth  
GBQ Partners  
Gongwer News Service  
McCarthy, Lebit, Crystal & Liffman Co., LPA  
Tammy's Tavern

McCulloch, Felger, Fite & Gutmann Co. L.P.A.  
WEWS-TV  
Kegler Brown Hill + Ritter  
Stateside  
UFPM  
MGM  
Orrick  
BetMGM  
Orrick, Herrington & Sutcliffe  
Rush Street Interactive  
Live! Casino & Hotel

bet365  
Blank Rome LLP  
Cooper Levenson, PA  
Ohio Dept. of Taxation  
PlayOhio  
Penn  
Fanatics Betting & Gaming  
PGNO  
Hensel Grad P.C.  
NASCAR  
GAN  
Government Edge  
Cincinnati Reds  
Finally Hear  
hard rock digital

Kindred Group Plc - Unibet Interactive Incorporated

Fanatics  
GLI  
MGM Resorts International  
Sunday Creek Horizons  
Better Collective  
City of Cincinnati  
CHW Advisors  
Ohio Department of Taxation  
Jock MKT  
Hannah News Service  
Ohio Lottery Commission  
Edelman Law  
Ohio Department of Taxation.  
Jeff DeLeone & Associates  
Kambi  
Dickinson Wright PLLC  
Caesars Sportsbook  
Tipcio  
PointsBet  
PGA TOUR  
Fpdm holdings llc  
Delaware North  
ELYS  
Playtech  
Ziggy's  
Wyncroft Strategies  
U.S. Integrity, Inc.  
VSiN  
Creekside Inn

Rush Street Interactive  
High Bridge Consulting  
JACK Entertainment  
Association of Independent Colleges and Universities of Ohio  
Cleveland Cavaliers

Front Office Sports  
University of Cincinnati  
Caesars Sportsbook  
Ice Miller  
ODJFS OCS  
cleveland.com  
WCMH-TV  
Gaming Laboratories International  
FanDuel  
Rush Street Interactive  
Rich Lanes, Inc.  
Casino City Press  
FanDuel  
PlayUp  
Fox Rothschild LLP  
DeLeone & Associates  
Fifth Third Bank  
SharpRank Inc  
Cincinnati Reds  
Caesars Digital  
Rush Street Interactive  
Problem Gambling Network of Ohio  
OpusNext LLC  
Cleveland Guardians

Tegna  
Haslam Sports Group  
Cosgrove Jonhenry Law & Policy  
Recreational gambler  
Ohio Lottery Commission  
Wells Fargo  
BETMGM

Fanatics  
RETIRED  
private  
Attorney  
Gambling.com  
MGM Northfield Park  
MGM Resorts International  
GeoComply

Entertainment  
Rush Street Interactive  
RMD Portfolios LLC  
OneComply  
Novomatic Americas Sales LLC  
Vorys Advisors  
Integrity Compliance LLC  
SCCG Management  
Ohio Department of Taxation

GAN  
MGM Resorts International  
VIXIO GamblingCompliance  
The Wall Street Journal  
Skybox Sports Network  
Cocca's Pizza  
Townhall II  
Trimac Advisors  
Flannery Georgalis, LLC  
McKinley Strategies

Bally's Interactive

PlayUSA.com  
State of Ohio - Lottery  
Highbridge Consulting  
Na  
The Akron Beacon Journal/USA Today  
SuperBook  
Saiber  
Digital Gaming Corporation  
Bassett's Market  
Bell Gaming LLC  
Nelson Government Strategies  
betohio.com  
The Daily Standard  
TwinSpires  
Run of the Mill Tavern

Kambi  
Calfee Halter & Griswold LLP  
Ohio State Bar Association  
OCCC  
JACK Entertainment  
OCCC  
Catena Media  
ADAMH Board of Franklin County

Fanatics Betting & Gaming  
LegalSportsReport/Catena Media  
Gambling.com Group  
Sapphire Risk Advisory Group  
OCCC  
Underdog  
Mcbills Beverage R. C. brothers inc  
Catena Media  
Ohio Catholic Federal Credit Union  
BetMGM  
PlayUp  
BetMGM  
OpenBet  
Tipico

Ohio Lottery Commission  
Churchill Downs Interactive Gaming  
Hollywood Casino Toledo  
Betfred  
13abc Action News  
Rush Street Interactive  
Blackhawk Network  
Whiteman Osterman & Hanna LLP  
The Blasdel Group  
Betfred Sports USA  
Blackhawk Network  
Walter Haverfield LLP  
Hensel Grad P.C.

Mass Gaming Commission  
Recovery Resources  
Attorney  
Caesars Entertainment-Caesars Sportsbook  
Tipico  
Eilers and Krejcik Gaming, LLC  
SBC  
Hard Rock Casino Cincinnati

Penn National Gaming Inc  
McKinley Strategies  
DGC  
Department of Taxation  
Ohio Department of Taxation

VIXIO GamblingCompliance  
bank  
DGC

BetMGM  
Saiber LLC  
GAMING1  
SuperBook Sports  
Gambling.com  
BetMGM  
SuperBook Sports dba SBOPco, LLC  
Armbruster Energy Stores  
Bose McKinney and Evans  
BetMGM, LLC  
Brouse McDowell  
Internet Vikings  
Elys Game Technology  
DraftKings  
PlayOhio.com  
Taft  
Iron Gate Gaming  
CapCity Strategic Communications LLC  
Consultant  
Ifrah Law  
Bet365  
Haslam Sports Group  
Backyard Bar LLC  
Catena Media  
BBB  
Hall of Fame Resort & Entertainment Co.  
Westfield Insurance  
Bose McKinney & Evans LLP  
Shaffer Entertainment  
17007 Lorain Avenue Inc  
Department of Taxation  
Hard Rock Cincinnati.  
Hollywood gaming Dayton Raceway

Compliable  
Thomas P. Pappas & Associates  
DraftKings Inc.  
Ohio Legislative Service Commission  
BetMGM  
bet365  
Underdog Sports  
Hahn Loeser & Parks LLP  
Law firm  
Taft  
Bricker & Eckler  
Cleveland.com  
Columbus Blue Jackets

Bettenders  
Sean P. Dunn & Associates  
Caesars Digital  
DSD Advisors, LLC  
Parlay Sporting Club + Kitchen  
better collective

Hard Rock Casino Cincinnati  
Fox Rothschild LLP  
Investor  
OHIO CASINO CONTROL COMMISSION  
Bennett Enterprises

Government Advocates  
PlayUSA  
Georges Media Group  
LegalSportsReport/Catena Media  
Gambling.com  
MGM Northfield Park  
Ulmer & Berne LLP  
Ohio Lottery  
The CJR Group, Inc.  
University of Cincinnati - Athletics  
Coolidge Wall Company  
Byers, Minton & Associates  
Capitol Advocates  
GBGD  
OCCC  
The Foundry  
Miami Valley Gaming and Racing  
bet365  
Ozzys Nottingham Pub  
Downtown Johnnys  
Ohio Department of Taxation  
Student Services

Fanatics  
Penn Interactive  
Cheviot News  
OCMA  
KFP Black Forest Pub, LLC  
Ohio Department of Taxation  
Recovery Resources  
BMM Testlabs  
SportsHub Games Network  
PwC



G & E market, llc.  
Baldwin Wallace University  
Bleachers Sports Grill  
Fanatics Betting & Gaming  
Fiserv  
Columbus Blue Jackets  
COLE KEPRO INTERNATIONAL  
Ohio citizen  
Catena Media  
Betfred USA Sports  
Fanatics Betting and Gaming  
Cleveland Indoor Golf

Taft, Stettinius & Hollister

Ohio Department of Taxation  
Government Strategies Group  
OsuWitt, LLC  
PointsBet  
Corporate Management Group, LTD.  
Sports Handle  
Blue Laser Digital  
MGM  
penn national gaming  
Cleveland Browns/Columbus Crew  
Tipico Sportsbook

Montgomery County ADAMHS Board  
Chud's Inc.  
Local Thyme, LLC  
Subworx  
Cleveland Cavaliers  
Hammer Time Pub, LLC  
Mac Murray & Shuster  
BetMGM  
Greater Columbus Sports Commission  
ISI Sports  
Farikal Corp  
Global Sustainable Technology & Development

Bally's Corporation  
Keating Muething & Klekamp PLL  
JACK Entertainment  
Hollywood Gaming Dayton Raceway  
Gaming Laboratories International  
Duane Morris LLP  
Kallner & Associates

Sun Indian Creek  
North American Bancard  
Gaming Today  
Ohio Casino Control Commission

Sean P. Dunn & Assoc. LLC  
On Tap Grille and Bar  
Miller Companies  
XLMedia  
Government Edge

N/A  
MCC  
Playtech  
Ohio Lottery  
Vast Solutions  
cleveland.com / The Plain Dealer  
The Patio  
AIM Media Midwest, LLC  
Bloomberg Tax  
WKRC TV  
magdalenas bar and grill

Gaming Intelligence  
BetMGM  
Catena Media

888

action palace ohio, llc  
GI Enterprises LLC  
MCESC  
Ohio State Bar Association  
Ohio Association of Broadcasters  
Michael Best & Friedrich  
JB Hamlin  
betparx  
SBC Americas  
Prevention Action Alliance  
SportsHandle/Better Collective  
None  
Memories Food & Spirit  
USA TODAY Network Ohio Bureau  
PayPal  
Ballard Spahr  
Weston Inc.

TAPPP  
Marshall Melhorn  
Dyve Ltd  
MGM  
The Business Journal of Youngstown  
Kegler Brown Hill + Ritter  
US Betting Report  
Buffalo Wild Wings  
Shift4 Payments

Sportradar  
The Pub  
Penn National Gaming.  
Heitner Legal, P.L.L.C.  
Sportradar  
BetMGM  
bet365  
Gaming Intelligence  
FanDuel  
IGT  
Business Journals  
Bally's Interactive  
Ohio Lottery  
Better Collective  
PlayUSA  
Buzz Capital  
Davidsons Restaurant  
Rock Creek Kitchen and Bar  
Kambi  
Light & Wonder  
GeoComply Solutions Inc.

Odds On Compliance  
Marown Holdings Limited  
Brennan, Manna & Diamond  
Ohio Sportsbook League  
OhioMHAS  
Governmental Policy Group, Inc.  
Hollywood Gaming Mahoning Valley  
Ohio Casino Control Commission  
MGM Northfield Park  
Columbus Blue Jackets  
Granary Way Media LLC  
Novomatic AG  
Origo Branding  
bet365  
Bet365

NEA Consulting  
Gambling.com Group  
NFL Integrity Representative  
Problem Gambling Network of Ohio  
Sandusky County Public Health  
Kiatta Saloon

ESPN  
IGT  
GeoComply  
Cleveland Guardians

Ohio Lottery Commission  
Hard Rock Cincinnati  
The Hedge Sports  
BMM TESTLABS  
Ohio Lottery Commission  
United Tote Company  
Caesars

MGM  
NelsonMullins  
Ohio Department of Commerce  
na  
Rushstreet Interactive  
Government Strategies Group  
Ohio Department of Taxation

iGaming Capital LLC  
HOPE in Fostoria  
Bet Sports Ohio LLC  
Milligans pub  
Digital Gaming Corporation USA  
Shumaker  
USAbility Digital Europe Limited  
Amazon Web Service  
OCCC

Belterra Park Cincinnati - Boyd Gaming Corporation  
Blank Rome LLP  
The LCADA Way  
NEA Consulting  
Amazon  
Stabones Sports and Gaming  
Robbins Alloy Belinfante Littlefield LLC  
Canton Repository  
Caesars

DraftKings  
Doura-Schawohl Consulting LLC  
BetMGM  
Draftkings

The Kroger Co  
Ifrah Law  
OHHA  
Fansuite Entertainment Inc  
PointsBet  
EDF Compliance  
Ohio Lottery Commission  
Maverick Consulting  
Ohio Department of Taxation

bet365  
Zepf Center  
IBIA  
Civicpoint LLC  
The Times-Picayune | The Advocate  
Ohio Casino Control Commission  
Shawn's Irish Tavern  
Mr. Ed's Bar and Grill and Cameo Sport Park and Kitchen  
BetMGM

penn national gaming  
BetMGM  
Hard Rock Digital

Graphic Village  
Boyd Gaming  
Kambi  
Keating Muething & Klekamp PLL  
US Integrity  
Irish Bobb's Inc  
NeXT Sports Betting License Consultants  
Ohio Department of Taxation  
Ascendant Public Policy Group  
Rarefied Atmosphere, Inc  
JACK Entertainment  
Taft Law  
KP Law  
bet365  
Tuckers Tavern  
Wright Bet  
BDO USA  
Miami University

L and P Amusement  
JACK  
C.R. Festivals, LLC  
GAN Nevada  
RCE Midway Tavern, Inc.  
Hall of Fame Resort & Entertainment Co.  
Ohio Lottery Commission  
BetMGM  
Fantini Research  
Casino City Press  
West Church Social  
Caesars  
VIXIO Regulatory Intelligence  
The Hedge Sports  
Law Firm

PointsBet  
Yahoo Sports  
Xavier University

Ohio Casino Control Commission  
Fantini Research  
MGM Resorts International  
FanDuel  
Columbus Blue Jackets  
DraftKings  
MGM Northfield Park  
N/A  
Fanatics  
MVM209 Media LLC  
ShoeBet  
Penn Interactive  
FanDuel  
Recovery Resources  
BetMGM  
Hard Rock Casino  
FanDuel

Circa Sports  
OBEP Payments, LLC  
Circa Sports LLC  
SBC  
MGM Resorts Int.  
DraftKings  
VIXIO Gambling Compliance  
Sleeper  
VIXIO

Betr

Hall of Fame Resort & Entertainment Company

Derivco

Christianson Companies

**Metzler, Tessa**

---

**From:** Jess Panora <Jess.Panora@betmgm.com>  
**Sent:** Friday, January 26, 2024 4:23 PM  
**To:** Rule Comments  
**Cc:** Robyn Bowers; Matthew Barrack  
**Subject:** BetMGM Comments on Proposed Changes to Ohio Adm. Code 3775-16-03  
**Attachments:** 01-26-2024 - Comment for Proposed Change to Ohio Adm. Code 3775-16-03, Sports Gaming Accounts.pdf

Good Afternoon,

BetMGM is pleased to submit the attached comments on the proposed changes to Ohio Adm. Code 3775-16-03, Sports Gaming Accounts.  
Please reach out should you have any questions.

Thank you for the opportunity,

**Jess Panora**

Regulatory Administration Analyst - Compliance

E: [jess.panora@betmgm.com](mailto:jess.panora@betmgm.com)



**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.





January 26, 2024

*Via Electronic Mail*

Ohio Casino Control Commission  
100 E. Broad St 20th Floor  
Columbus, OH 43215

**RE: Sports Wagering Regulation for Comment**

Dear Commissioners,

BetMGM thanks the Commission for offering the opportunity to review and provide comments on the proposed amendment to Ohio Adm. Code 3775-16-03, Sports Gaming Accounts. Leveraging its extensive expertise as a sports betting operator and its collaborative efforts with regulators in twenty-nine jurisdictions during the formulation of their regulations, BetMGM aims to provide constructive input to enhance the effectiveness of Ohio operations and align the proposed procedures with the regulations of other states for consistency. BetMGM respectfully submits the following comments for consideration.

**Rule 3775-16-03 | Sports gaming accounts.**

**OCCC Proposed Regulation Update:**

(5) ~~Provide~~ Require patrons ~~the option~~ to protect access to funded sports gaming accounts with multifactor authentication or similar authentication method, as approved by the executive director;

**BetMGM Comment:**

BetMGM recently began enforcing MFA for all logins from an unrecognized device and has seen a significant decline in the number of account-related player complaints since this was implemented. Additionally, BetMGM has the capability to implement a "trust" window for successful MFA logins such that after a two-week period, the device returns to an unrecognized status and must undergo an MFA login again the next time a login attempt is made with said device. BetMGM feels that requiring MFA for logins from all new devices and then again at most every two weeks thereafter, strikes a middle ground that provides ample account security while not having a severe negative impact the player experience, and that the option to enable MFA on every login should remain up to the player to enable at their discretion.

\*\*\*\*\*

We again want to express our appreciation for your thoughtful consideration of BetMGM's feedback on the Commission's proposed regulations. Should you have any questions about our submission or wish to discuss it further, please feel free to contact us.

Sincerely,

BetMGM

## Metzler, Tessa

---

**From:** Dean Hestermann <DHestermann@caesars.com>  
**Sent:** Friday, January 26, 2024 3:20 PM  
**To:** Rule Comments  
**Subject:** Comment on proposed amendment in Ohio Adm. Code 3775-16-03, Sports Gaming Accounts

Dear Sir or Madam,

On behalf of Caesars Sportsbook, I thank you for the opportunity to provide comment on the proposed change related to multi-factor authentication in Ohio Adm. Code 3775-16-03, Sports Gaming Accounts.

Caesars strongly supports various multi-factor authentication initiatives to help customers protect their information and accounts. Across the jurisdictions where we operate, we have found the best approach is a mix of regulatory requirements and user-controlled options. Some examples of when multi-factor authorization might be required is upon the use of a new device, or after a specified period of inactivity (such as a period ranging from 30-90 days). Opportunities at a customer's control might include giving the customer the ability to enable multi-factor authentication on every log-in, or potentially upon certain other events.

We would encourage the Commission to strike a balance between these two kinds of options, and to consider the technical capabilities of Ohio sports betting operators and applications to determine the other events where they might be required to offer customers the option of multi-factor authentication. It may take some time for operators to modify their software and systems to permit multi-factor authentication upon some events.

Again, thank you for the opportunity to provide comment.

Sincerely,  
Dean Hestermann



**Dean Hestermann** | Vice President, Issues Management and Strategic

Communications

O 901-652-8787

1821 Overton Park Avenue | Memphis, TN 38112

Caesars | Harrah's | Horseshoe

[www.caesars.com](http://www.caesars.com)

Responsible Gaming Is Our Business: Must be 21 or older to gamble. Know when to stop before you start. Gambling problem? Call or text 1-800-522-4700.

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.



**Metzler, Tessa**

---

**From:** Kevin Cochran <kcochran@draftkings.com>  
**Sent:** Friday, January 26, 2024 10:47 AM  
**To:** Rule Comments  
**Cc:** Sarah Meuli; David Prestwood  
**Subject:** DraftKings - Comments to Proposed Rule 3775-16-03  
**Attachments:** DraftKings - Sports Gaming Comment - 1-26-2024.pdf

Good morning,

Thank you for the opportunity to provide feedback on the proposed changes to rule 3775-16-03. Attached, please find feedback from DraftKings and let us know if the Commission has any questions or would like to follow up related to our submission or another matter.

Thanks again and have a nice weekend,

Kevin

**KEVIN COCHRAN**

Director, Legal and Government Affairs  
DraftKings Inc.  
215-290-4428



**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.



January 26, 2024

Via E-Mail to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov)

Ohio Casino Control Commission  
100 East Broad Street, 20th Floor  
Columbus, OH 43215

**RE: SPORTS GAMING RULE (3775-16-03) FOR COMMENT**

In response to the Ohio Casino Control Commission's ("Commission") proposed Sports Gaming rule change related to Sports Gaming Accounts, as distributed to Sports Gaming Stakeholders on January 16, 2024, Crown OH Gaming LLC d/b/a DraftKings ("DraftKings") submits the following comments and questions for consideration. As a leading sports wagering operator in the United States, DraftKings has first-hand experience with regulatory frameworks that address sports wagering, and submits these comments based on its operational knowledge in multiple regulated markets.

**Rule 3775-16-03 | Sports gaming accounts**

Reason for Change: DraftKings respectfully requests the Commission consider amending this provision to narrow the circumstances upon which a patron must perform multi-factor authentication ("MFA") to only a first-time login on a new device or every 14 days. Limiting MFA in this regard achieves account security without compromising the user experience in a way that comports with industry standards in leading jurisdictions such as Iowa, New Jersey and Pennsylvania. DraftKings respectfully requests consideration of limiting the user burden on an Ohio patron while still requiring MFA at least once every two weeks.

**Proposed Rule Language (including the Commission's proposed amendments):**

5) ~~Provide~~ Require patrons ~~the option~~ to protect access to funded sports gaming accounts with multi- factor authentication or similar authentication method, as approved by the executive director, **when the patron logs in through a specific device for the first time, and at least every fourteen days for each unique device;**

\* \* \* \* \*

Thank you for your consideration of DraftKings' comments regarding the Commission's proposed changes to Rule 3772-16-03. Please feel free to reach out should you or anyone else at the



Commission have any questions about our submission or our experience in other regulated jurisdictions.

Sincerely,

DraftKings Inc.

**Metzler, Tessa**

---

**From:** Michael Levine <michael.levine@betfanatics.com>  
**Sent:** Friday, January 26, 2024 8:13 PM  
**To:** Rule Comments  
**Subject:** FBG Public Comments: 3775-16-03

Ohio Casino Control Commission,

Fanatics Betting & Gaming ("FBG") appreciates the opportunity to comment on the proposed amendment to Ohio Adm. Code 3775-16-03. FBG welcomes the addition of multi-factor authentication ("MFA") to secure customer accounts. That said, FBG proposes that the Ohio Casino Control Board contemplate a 14-day (for example) grace period (similar to other jurisdictions) whereby customers are required to complete MFA once every 14 days, per device. In addition, FBG respectfully requests that when this rule is enacted that there be an implementation period of approximately three (3) months to account for any updates to the rule post comment period.

Should you have any questions, please feel free to contact me.

Thank you,

Mike

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.

**Metzler, Tessa**

---

**From:** Daniel Mulhall <daniel.mulhall@betfanatics.com>  
**Sent:** Friday, January 26, 2024 4:25 PM  
**To:** Rule Comments  
**Cc:** Alex Smith; Lauren Lemmer  
**Subject:** FBG Comment: Ohio Adm. Code 3775-16-03

All,

While Fanatics Betting & Gaming supports OCCC's commitment to increased patron account security and believes multi-factor authentication to be a critical tool towards furthering those goals, our experience in other jurisdictions has shown that these goals can be met while also limiting patron friction on each login attempt. To that end, we would like to submit an addition to the proposed amended section to include a fourteen day grace period following successful multi-factor authentication on a unique device. This proposed revision is consistent with requirements in both New Jersey and Pennsylvania, which allow for the grace period only after a device has been successfully authenticated. Logins on new devices will require multi-factor authentication.

#### **Rule 3775-16-03 | Sports gaming accounts**

(5) Require patrons to protect access to funded sports gaming accounts with multi- factor authentication or similar authentication method, as approved by the executive director. After successful login, multi-factor authentication will need to be performed at least every fourteen days for each unique device.

We appreciate your consideration in advance. Thank you.

--

**Dan Mulhall**  
Senior Manager, New Markets  
m. 201.572.0032  
Fanatics Betting & Gaming

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.



**Metzler, Tessa**

---

**From:** Nicolas Soto <nicolas.soto@fanduel.com>  
**Sent:** Wednesday, January 24, 2024 11:47 AM  
**To:** Rule Comments  
**Cc:** Cory Fox; Josh Mehta; Tom Smith  
**Subject:** FanDuel Comments on Proposed Amendment to Ohio Adm. Code 3775-16-03  
**Attachments:** FanDuel Comments on Proposed Ohio Sports Gaming Amendments - 01.24.24.pdf

Good Morning,

Please see attached FanDuel comments regarding the Proposed Amendment to Ohio Adm. Code 3775-16-03.

We appreciate your time and consideration of our comments and would be happy to discuss them at your convenience.

Sincerely,

**Nicolas Soto**  
Compliance Manager  
[Nicolas.Soto@FanDuel.com](mailto:Nicolas.Soto@FanDuel.com) | (914) 356-2626



CONFIDENTIALITY: This e-mail transmission may contain privileged and confidential material. If you are not the person or entity addressed, misusing the content or disclosing information contained herein may be a violation of federal or state law. An inadvertent transmission of this material to persons or business entities is not intended to waive, and does not waive, privileges and protections such as the attorney/client privilege or work product doctrine.

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.



Cory Fox  
Cory.fox@fanduel.com

January 24, 2024

*Via Email to rulecomments@casinocontrol.ohio.gov*

Matt Schuler, Executive Director  
Ohio Casino Control Commission  
100 East Broad Street, 20<sup>th</sup> Floor  
Columbus, OH 43215

**Re: FanDuel comments on proposed amendment to “Ohio Adm. Code 3775-16-03.”**

Dear Executive Director Schuler:

I write to provide comments on behalf of FanDuel Group, Inc. (“FanDuel”) regarding the Ohio Casino Control Commission’s (the “Commission”) proposed amendment to “Ohio Adm. Code 3775-16-03.” (“Proposed Amendment”). Based on our extensive experience as an operator in the sports betting industry and collaborator with regulators of sports wagering in many states in the development of their regulations, we offer constructive feedback on ways in which the Proposed Amendment can be improved to be effective for both the Commission and operators, as well as ultimately in enhancing customer protections.

We thank the Commission for affording stakeholders the opportunity to provide comments on the Proposed Amendment.

The Proposed Amendment would “Require patrons to protect access to funded sport gaming accounts with multi-factor authentication or similar authentication method, as approved by the executive director.” Other states that have similarly moved toward requiring multi-factor authentication to enhance patron account protections, such as Iowa<sup>1</sup>, New Jersey<sup>2</sup>, and Pennsylvania<sup>3</sup>, have embraced trusted device functionality and required patrons to utilize multi-

---

<sup>1</sup> Authentication for log in using a multi-factor authentication process or other secure alternative means as authorized by the commission. After successful log in, multifactor authentication will need to be performed at least every fourteen days for each unique device. [ARC 7070C – Proposed Amendments to be considered during 01/25/24 Iowa Racing and Gaming Commission Meeting - <https://irgc.iowa.gov/media/293/download?inline=> - see Item 11 on pp. 8-9 for relevant text]

<sup>2</sup> Once a patron has successfully logged in using multi-factor authentication, subsequent logins to the same account on that same device can be exempt from multi-factor authentication for a period not to exceed two weeks. New Jersey Division of Gaming Enforcement Multi-Factor Authentication Best Practices.

<sup>3</sup> The new MFA requirement will entail the Interactive Gaming Operator to employ an MFA method for each device that a patron utilizes to access their interactive gaming account. Once a device is authenticated using MFA, the MFA process will



factor authentication at login once every 14 days for each unique device. Embracing trusted device functionality in this manner would provide a mechanism to adequately protect patron accounts, while ensuring the user experience in Ohio remains consistent with other US jurisdictions that require multi-factor authentication for sports gaming accounts.

We suggest the following edits to the Proposed Amendment. For the sake of clarity, proposed additions will be shown in **bold and underlined** text.

*Rule 3775-16-03 | Sports gaming accounts*

(E) A sports gaming proprietor may allow a sports gaming account to be deposit-enabled. In addition to the listed requirements, a deposit-enabled account must:

(5) Require patrons to protect access to funded sports gaming accounts with multi-factor authentication or similar authentication method, as approved by the executive director, **for each new device. After a successful login with multi-factor authentication or similar authentication method for a specific device, the patron is not required to utilize multi-factor authentication or a similar authentication method to access their account from that device for a period of 14 days.**

\*\*\*\*\*

We appreciate your time and consideration of our comments and would be happy to discuss them at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cory Fox'.

Cory Fox

Vice President for Product and New Market Compliance

---

not be required again for that device for a period of fourteen days. Once the fourteen days have past, the patron will have to reauthenticate their device using the MFA process. Each different device a patron uses to access their interactive gaming account will have to perform MFA and the MFA will remain valid for fourteen days after the last time that device successfully passed MFA. Pennsylvania Gaming Control Board Letter regarding Interactive Gaming Account Multi-Factor Authentication (MFA) Requirement.

## Metzler, Tessa

---

**From:** Neil Squires <NSquires@delawarenorth.com>  
**Sent:** Friday, January 26, 2024 9:28 AM  
**To:** Rule Comments  
**Cc:** Anthony Campoli  
**Subject:** FW: Sports Gaming Rule for Comment - 01/16/24

Hello OCCC,

Related to the questions previously sent, the first and third questions still stand and would like response. The second item we would like to put forth as a comment:

- Gamewise would like to see MFA defined within the Rules to help ensure there is no ambiguity as to what is intended.

Thank you.

Best,

Neil Squires | Sr. Compliance Manager  
**GAMEWISE**

---

**From:** Neil Squires  
**Sent:** Wednesday, January 17, 2024 10:44 AM  
**To:** rulecomments@casinocontrol.ohio.gov  
**Cc:** Anthony Campoli <ACampoli@delawarenorth.com>  
**Subject:** FW: Sports Gaming Rule for Comment - 01/16/24

Hello OCCC,

Gamewise/MVGBet has some questions related to this rule change proposal:

1. What is the expected/anticipated timeline on when the OCCC will expect the MFA to be in place as a platform requirement?
2. How does the OCCC define MFA?
3. Would Captcha be considered a *"similar authentication method"* by the OCCC?

We look forward to your responses.

Best,

Neil Squires | Sr. Compliance Manager  
**GAMEWISE**

---

**From:** Ohio Casino Control Commission <[communications@casinocontrol.ohio.gov](mailto:communications@casinocontrol.ohio.gov)>  
**Sent:** Tuesday, January 16, 2024 3:36 PM

To: Neil Squires <[NSquires@delawarenorth.com](mailto:NSquires@delawarenorth.com)>

Subject: Sports Gaming Rule for Comment

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[View this email in your browser](#)



Sports Gaming Stakeholders,

The Commission is proposing an amendment to one Sports Gaming rule: Ohio Adm. Code 3775-16-03, Sports Gaming Accounts. The change is intended to streamline and update regulatory language related to multi-factor authentication. The proposed version of this rule can be found [here](#).

As always, please feel free to forward this communication to anyone else you think may be interested in this rule. Additionally, anyone may sign up for the Commission's sports gaming listserv themselves [here](#). If you would like to unsubscribe from this listserv, you may do so using the link located at the bottom of this email.

We understand that you may have questions or would like additional information before commenting, and if that is the case, we encourage you to reach out to your normal contacts at the Commission or to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) at your earliest convenience. If, in the end, you would like to provide written comments, please email them to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) by **5:00pm January 26**.

While you will have some additional chances to comment on these rules, including when they are filed with the state's Common Sense Initiative Office, please note that it is much easier for the Commission and for stakeholders to work out any questions or comments directly before the rules start the formal rule filing process.



*Copyright (C) 2024 Ohio Casino Control Commission. All rights reserved.*  
You are receiving this email because you signed up for sports gaming updates.

Our mailing address is:  
Ohio Casino Control Commission 100 E. Broad St 20th Floor COLUMBUS, OH 43215 USA

Want to change how you receive these emails?  
You can [update your preferences](#) or [unsubscribe](#)

## Disclaimer

The information contained in this electronic mail transmission is intended only for the use of the recipient(s) named above. It may contain proprietary, confidential or privileged information of the sender. As a recipient of this email, you are required to ensure that any personal data contained within is kept secure. If you forward this email and/or any attachments, you must ensure you are entitled to do so under data protection legislation. If you are not the intended recipient, you are hereby notified that any disclosure, dissemination, distribution or copying of the information contained in this transmission is strictly prohibited. If you have received this transmission in error, please notify the sender immediately by reply electronic mail and delete the original message and any copy of it from your computer system.

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.

## Metzler, Tessa

---

**From:** Robert McAdoo <R.McAdoo@gaminglabs.com>  
**Sent:** Thursday, January 25, 2024 4:05 PM  
**To:** Rule Comments  
**Cc:** James Luccarelli; Joseph Carlon; Ventsislav Vasilev  
**Subject:** Sports Gaming Rule for Comment for Multi-Factor Authentication

To Whom It May Concern,

Gaming Laboratories International would like to submit the following comment in regards to the requirements for the Multi-Factor Authentication requirement proposed revision. Please see the following after the requirement noted:

Rule 3775-16-03 | Sports gaming accounts

(E) A sports gaming proprietor may allow a sports gaming account to be deposit-enabled. In addition to the listed requirements, a deposit-enabled account must:

(5) ~~Provide~~ **Require** patrons the ~~option~~ to protect access to funded sports gaming accounts with multi-factor authentication **or similar authentication method**, as approved by the executive director;

Comment/Suggestion proposed for consideration from Gaming Laboratories International:

Recommend appending the following text or similar to (5) which provides more guidance on when multi-factor authentication is required to be used. This is based on requirements used in other established sportsbook markets.

**Once a patron has successfully logged in using multi-factor authentication, subsequent logins to the same account on that same device can be exempt from multi-factor authentication for a period not to exceed two weeks.**

The laboratory appreciates the Commission's time and consideration on the proposed comment for the rule in question and is available to provide additional details upon request if needed. Thank You.

**Robert Mc Adoo**

Senior Technical Compliance Engineer

[www.gaminglabs.com](http://www.gaminglabs.com)

o 303-277-1172 EXT 2122

d 303-215-5822

e [R.McAdoo@gaminglabs.com](mailto:R.McAdoo@gaminglabs.com)





---

The information contained in this message may contain privileged, and confidential information, and be protected from disclosure. If you are not the intended recipient, or an employee, or agent responsible for delivering this message to the intended recipient, you are hereby notified that reading, using, copying, disseminating or, distributing this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by return e-mail or by calling 732-942-3999 and permanently delete the message and any attachments from your computer.

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.



**Metzler, Tessa**

---

**From:** Morrison, Andromeda  
**Sent:** Monday, January 22, 2024 10:09 AM  
**To:** Rule Comments  
**Subject:** FW: [External Email] Sports Gaming Rule for Comment



**Andromeda Morrison**

General Counsel &  
Director of Skill Games  
Ohio Casino Control Commission  
(614) 387-5616

---

**From:** CAC Communications <Communications@casinocontrol.ohio.gov>  
**Sent:** Monday, January 22, 2024 9:26 AM  
**To:** Morrison, Andromeda <Andromeda.Morrison@casinocontrol.ohio.gov>  
**Subject:** FW: [External Email] Sports Gaming Rule for Comment

Sorry if you've already received a version of this, but wanted to make sure you had it for the MFA rule proposal.

Let me know if you need anything.

Jess

---

**From:** Robert Wamsley <[Robert.Wamsley@hrcincinnati.com](mailto:Robert.Wamsley@hrcincinnati.com)>  
**Sent:** Friday, January 19, 2024 5:38 PM  
**To:** CAC Communications <[Communications@casinocontrol.ohio.gov](mailto:Communications@casinocontrol.ohio.gov)>  
**Cc:** CAC, OCCC Compliance <[CAC.Compliance@casinocontrol.ohio.gov](mailto:CAC.Compliance@casinocontrol.ohio.gov)>  
**Subject:** RE: [External Email] Sports Gaming Rule for Comment

Good afternoon OCCC Team,

HRC agrees with the rule change and has no comment. Thank you.



**CINCINNATI**

Respectfully,

Robert

**ROBERT WAMSLEY | DIRECTOR OF COMPLIANCE**

D: 513.250.3117 | M: 513.609.7205  
[Robert.wamsley@hrcincinnati.com](mailto:Robert.wamsley@hrcincinnati.com)

**Hard Rock Casino Cincinnati**  
1000 Broadway Street | Cincinnati, Ohio 45202  
<https://www.hardrockcasinocincinnati.com/>

**From:** Ohio Casino Control Commission <[communications@casinocontrol.ohio.gov](mailto:communications@casinocontrol.ohio.gov)>

**Sent:** Tuesday, January 16, 2024 4:36 PM

**To:** Robert Wamsley <[Robert.Wamsley@hrcincinnati.com](mailto:Robert.Wamsley@hrcincinnati.com)>

**Subject:** [External Email] Sports Gaming Rule for Comment

[View this email in your browser](#)



## OHIO CASINO CONTROL COMMISSION

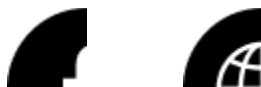
Sports Gaming Stakeholders,

The Commission is proposing an amendment to one Sports Gaming rule: Ohio Adm. Code 3775-16-03, Sports Gaming Accounts. The change is intended to streamline and update regulatory language related to multi-factor authentication. The proposed version of this rule can be found [here](#).

As always, please feel free to forward this communication to anyone else you think may be interested in this rule. Additionally, anyone may sign up for the Commission's sports gaming listserv themselves [here](#). If you would like to unsubscribe from this listserv, you may do so using the link located at the bottom of this email.

We understand that you may have questions or would like additional information before commenting, and if that is the case, we encourage you to reach out to your normal contacts at the Commission or to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) at your earliest convenience. If, in the end, you would like to provide written comments, please email them to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) by **5:00pm January 26**.

While you will have some additional chances to comment on these rules, including when they are filed with the state's Common Sense Initiative Office, please note that it is much easier for the Commission and for stakeholders to work out any questions or comments directly before the rules start the formal rule filing process.



*Copyright (C) 2024 Ohio Casino Control Commission. All rights reserved.*  
You are receiving this email because you signed up for sports gaming updates.

Our mailing address is:  
Ohio Casino Control Commission 100 E. Broad St 20th Floor COLUMBUS, OH 43215 USA

Want to change how you receive these emails?  
You can [update your preferences](#) or [unsubscribe](#)

---

**EXTERNAL EMAIL NOTICE: Think Before You Click!**

---

DISCLAIMER: This e-mail message and any attachments are intended solely for the use of the individual or entity to which it is addressed and may contain information that is confidential or legally privileged. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, copying or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately and permanently delete this message and any attachments.

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.

**Metzler, Tessa**

---

**From:** Adam Kates <adam.kates@penn-interactive.com>  
**Sent:** Friday, January 26, 2024 9:48 AM  
**To:** Rule Comments  
**Cc:** Matthew.Spitnale@pennentertainment.com; Haggerty, Samantha; Gregory Brooks  
**Subject:** Rule Comment: Ohio Adm. Code 3775-16-03

Good morning OCCC team,

On behalf of Penn Sports Interactive, we respectfully submit the below comments on the recently proposed MFA rule amendment.

Thank you for the opportunity, and have a wonderful weekend.

Adam

**PSI Commentary:**

Penn Sports Interactive (“PSI”) appreciates the opportunity to provide commentary on the Ohio Casino Control Commission’s proposed amendment to the Sports Gaming rule: Ohio Adm. Code 3775-16-03, Sports Gaming Accounts, specifically surrounding the use of multi-factor authentication (“MFA”).

PSI is generally in support of MFA and currently adheres to MFA and general account security best practices on the ESPN BET platform in Ohio. As currently implemented, ESPN BET requires MFA whenever a patron logs into their account from a new device and any time a patron makes a change to or updates their account information or credentials. In addition, any change to a patron’s account completed via Customer Support requires the patron to verify certain personally identifiable information in real-time before any changes may be made.

Finally, PSI permits patrons to opt into MFA for each and every login attempt to their sports gaming account if they chose to do so.

PSI respectfully recommends that the Commission maintain the patron optionality included in the currently effective rule 3775-16-03, or alternatively, implementing a requirement to complete MFA at various key touchpoints (such as each new device that is used) which would achieve a similar outcome of enhanced account security with less patron friction.

--

**Adam Kates**

Senior Director, Compliance

**PENN Interactive**

[adam.kates@penn-interactive.com](mailto:adam.kates@penn-interactive.com)

P: 416-479-8812 ext. 2728

[pennentertainment.com](http://pennentertainment.com)



**Confidentiality Notice:** This email and all attachments may be confidential information and are intended solely for the individual or entity named in the email address. If you receive this email in error or if it is improperly forwarded to you, please notify the sender immediately by reply email, and delete/destroy the original and all copies, including any attachments. Any unauthorized review, use, disclosure, reproduction, or distribution in part or in whole, is strictly prohibited and may be unlawful.

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.

**Metzler, Tessa**

---

**From:** Lisa Powers <LisaPowers@jackentertainment.com>  
**Sent:** Friday, January 26, 2024 4:53 PM  
**To:** Morrison, Andromeda; CAC, OCCC Compliance  
**Cc:** Allyson Miller; Adam Suliman  
**Subject:** RE: Sports Gaming Rule for Comment

Good Afternoon Andromeda,

Thank you for the detailed explanation. Respectfully, JACK Cleveland Casino and JACK Thistledown Racino propose the following revision to the rule:

(5) Require patrons to protect access to funded sports gaming accounts with multi-factor authentication or similar authentication method, as approved by the executive director, ***within ninety days from the effective date of this rule.***

We have reached out to our vendors for a scope of work to make this change and this timeline would allow us to comply with the rule while delivering a positive experience for our Ohio users. We would use this time to make the necessary changes to our registration flow, integrate with an SMS/text vendor for the authentication codes, update the code bases (Apple, Android, web, mobile-web), and modify the PAM-front end integration points. In addition to the development work, we would need to obtain GLI certification and conduct quality assurance and user testing prior to deployment, which could take place within the proposed timeframe.

Please let me know if you have any questions or we can provide any additional information.

Thank you,  
Lisa

LISA POWERS  
DIRECTOR OF COMPLIANCE  
D: 216-297-4798  
M: 513-667-4506  
LISAPOWERS@JACKENTERTAINMENT.COM  
100 PUBLIC SQUARE, CLEVELAND, OH, 44113  
[WWW.JACKENTERTAINMENT.COM](http://WWW.JACKENTERTAINMENT.COM)



---

**From:** Andromeda.Morrison@casinocontrol.ohio.gov <Andromeda.Morrison@casinocontrol.ohio.gov>  
**Sent:** Wednesday, January 17, 2024 3:04 PM  
**To:** Lisa Powers <LisaPowers@jackentertainment.com>; CAC.Compliance@casinocontrol.ohio.gov  
**Cc:** Allyson Miller <AllysonMiller@jackentertainment.com>; Adam Suliman <AdamSuliman@jackentertainment.com>  
**Subject:** RE: Sports Gaming Rule for Comment

\*\*\*This email comes from an external source. Do not click on links or open attachments that you do not recognize.\*\*\*

Hi Lisa,

I was trying to get you a response too quickly and realize I did not provide the additional context of the rule change that would allow a sportsbook to submit an approval request to the executive director to seek approval of an authentication method that may deviate from the general rule provision. I think the idea here is that the Commission is open to other practices that provide security that may be different depending on operator needs. A time frame/frequency would be something that I think could fit into that category.

Open to your feedback as to time frame or frequency, of course, during the stakeholder comment period.

Thanks,  
Andromeda



**Andromeda Morrison**

General Counsel &  
Director of Skill Games  
Ohio Casino Control Commission  
(614) 387-5616

---

**From:** Morrison, Andromeda  
**Sent:** Wednesday, January 17, 2024 12:53 PM  
**To:** Lisa Powers <[LisaPowers@jackentertainment.com](mailto:LisaPowers@jackentertainment.com)>; CAC, OCCC Compliance <[CAC.Compliance@casinocontrol.ohio.gov](mailto:CAC.Compliance@casinocontrol.ohio.gov)>  
**Cc:** Allyson Miller <[AllysonMiller@jackentertainment.com](mailto:AllysonMiller@jackentertainment.com)>; Adam Suliman <[AdamSuliman@jackentertainment.com](mailto:AdamSuliman@jackentertainment.com)>  
**Subject:** RE: Sports Gaming Rule for Comment

Hi Lisa,

Thanks for reaching out for clarification. The current draft and intent is to require multi factor authentication for each log-in.

Thanks,  
Andromeda



**Andromeda Morrison**

General Counsel &  
Director of Skill Games  
Ohio Casino Control Commission  
(614) 387-5616

---

**From:** Lisa Powers <[LisaPowers@jackentertainment.com](mailto:LisaPowers@jackentertainment.com)>  
**Sent:** Tuesday, January 16, 2024 5:46 PM  
**To:** CAC, OCCC Compliance <[CAC.Compliance@casinocontrol.ohio.gov](mailto:CAC.Compliance@casinocontrol.ohio.gov)>; Morrison, Andromeda <[Andromeda.Morrison@casinocontrol.ohio.gov](mailto:Andromeda.Morrison@casinocontrol.ohio.gov)>  
**Cc:** Allyson Miller <[AllysonMiller@jackentertainment.com](mailto:AllysonMiller@jackentertainment.com)>; Adam Suliman <[AdamSuliman@jackentertainment.com](mailto:AdamSuliman@jackentertainment.com)>  
**Subject:** FW: Sports Gaming Rule for Comment

Good Afternoon,

For clarification, does this rule change require MFA authentication for patrons for each login? Or is it MFA authentication for initial account set-up and then login thereafter if a patron so chooses?

Lastly, if it is for each login, if a patron completes MFA authentication to login and then logs in from the same device, would MFA authentication still be required or is it satisfied for a certain time period, such as 30 days from the same device?

Thank you,  
Lisa

LISA POWERS

DIRECTOR OF COMPLIANCE

D: 216-297-4798

M: 513-667-4506

[LISAPOWERS@JACKENTERTAINMENT.COM](mailto:LISAPOWERS@JACKENTERTAINMENT.COM)

100 PUBLIC SQUARE, CLEVELAND, OH, 44113

[WWW.JACKENTERTAINMENT.COM](http://WWW.JACKENTERTAINMENT.COM)



---

**From:** Ohio Casino Control Commission <[communications@casinocontrol.ohio.gov](mailto:communications@casinocontrol.ohio.gov)>

**Sent:** Tuesday, January 16, 2024 4:36 PM

**To:** Lisa Powers <[LisaPowers@jackentertainment.com](mailto:LisaPowers@jackentertainment.com)>

**Subject:** Sports Gaming Rule for Comment

\*\*\*This email comes from an external source. Do not click on links or open attachments that you do not recognize.\*\*\*

[View this email in your browser](#)



OHIO CASINO  
CONTROL COMMISSION

Sports Gaming Stakeholders,

The Commission is proposing an amendment to one Sports Gaming rule: Ohio Adm. Code 3775-16-03, Sports Gaming Accounts. The change is intended to streamline and update regulatory language related to multi-factor authentication. The proposed version of this rule can be found [here](#).



As always, please feel free to forward this communication to anyone else you think may be interested in this rule. Additionally, anyone may sign up for the Commission's sports gaming listserv themselves [here](#). If you would like to unsubscribe from this listserv, you may do so using the link located at the bottom of this email.

We understand that you may have questions or would like additional information before commenting, and if that is the case, we encourage you to reach out to your normal contacts at the Commission or to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) at your earliest convenience. If, in the end, you would like to provide written comments, please email them to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) by **5:00pm January 26**.

While you will have some additional chances to comment on these rules, including when they are filed with the state's Common Sense Initiative Office, please note that it is much easier for the Commission and for stakeholders to work out any questions or comments directly before the rules start the formal rule filing process.



*Copyright (C) 2024 Ohio Casino Control Commission. All rights reserved.*  
You are receiving this email because you signed up for sports gaming updates.

Our mailing address is:  
Ohio Casino Control Commission 100 E. Broad St 20th Floor COLUMBUS, OH 43215 USA

Want to change how you receive these emails?  
You can [update your preferences](#) or [unsubscribe](#)

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to [csc@ohio.gov](mailto:csc@ohio.gov) or click the Phish Alert Button if available.