



Common Sense Initiative

Mike DeWine, Governor
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Business Impact Analysis

Agency, Board, or Commission Name: Ohio Casino Control Commission

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

Chapter 3772-19 Five Year Review Amended Rules

Rule Number(s): 3772-19-01 (amend), 3772-19-02 (amend), 3772-19-03 (amend), 3772-19-04 (amend), 3772-19-05 (amend), 3772-19-06 (amend), 3772-19-07 (amend), and 3772-19-09 (amend)

Date of Submission for CSI Review: November 1, 2024

Public Comment Period End Date: November 15, 2024

Rule Type/Number of Rules:

New/ rules

No Change/ rules (FYR?)

Amended/ 8 rules (FYR? Yes)

Rescinded/ rules (FYR?)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.

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.

The rules presented here are being reviewed pursuant to the state's rule-review requirement in R.C. 106.03 and are eight rules contained in Ohio Adm.Code Chapter 3772-19 (Security, Surveillance Systems, and Commission Facilities). The rules in this package are being amended to improve clarity and readability and to conform with current practices. Additionally, certain regulatory restrictions are being removed in order to comply with S.B. 9 of the 134th General Assembly.

- **3772-19-01 – titled “Definitions” (amendment)** This rule defines certain terms used throughout Ohio Adm.Code 3772-19 that are not defined elsewhere in the Administrative Code. The amendment removes the definition of “[d]irector of surveillance” because the same term is given a definition in Ohio Adm.Code 3772-10-03.
- **3772-19-02 – titled “Responsibilities of the surveillance department” (amendment)** This rule describes what each casino operator must maintain and make available to the commission at all times surrounding surveillance. This includes, but is not limited to, an interactive electronic floor plan showing locations of surveillance equipment, system components, and casino surveillance procedures. The rule also requires a surveillance department to receive and monitor certain slot machine alerts and that system modifications and upgrades are submitted to the executive director. The amendment removes the requirements that a casino submit plans for monitoring detention rooms and keep a

surveillance retention schedule, and also removes that the surveillance system is subject to audit or testing by the commission at any time without notice. Casinos are still subject to retention requirements pursuant to 3772-19-08 and audits and testing pursuant to R.C. Chapter 3772.

- **3772-19-03 – titled “Required surveillance system” (amendment)** The purpose of this rule is to detail the baseline requirements for each casino's surveillance system, including video camera quality, video monitor capability, and image capturing utility. The amendments to the rule streamline requirements with other rules. It also allows casinos to use any mechanism to ensure security, such as multi-factor authentication, fingerprints, or other appropriate security methods that may develop as technology evolves.
- **3772-19-04 – titled “Commission surveillance room and on-site facilities” (amendment)** The existing rule requires casino operators to provide an office and equipment room to the Commission for the Commission's exclusive use. It also specifies that the offices and rooms are used by the Commission to monitor and record activity at the casino facility. In line with established practice, the amendments require casino operators to provide an office and equipment to the Commission for the Commission's use, as approved by the Executive Director.
- **3772-19-05 – titled “Casino surveillance room” (amendment)** The purpose of this rule is to detail minimum specifications for the casino surveillance room, including location of the entrance, limits on access, and minimum surveillance room staff requirements. The amendment removes the requirement that the Executive Director approve entrance to the room and leaves the responsibility for approval solely with the director of surveillance to streamline authorization and to reflect industry practices.
- **3772-19-06 – titled “Surveillance department” (amendment)** The purpose of this rule is to detail minimum specifications for the casino surveillance department, including the responsibilities of the Director of Surveillance and surveillance employee training. The proposed amendments streamline the rule's language. They also remove the unnecessary restriction that the Executive Director's approval is necessary for a casino operator to divert surveillance resources. Finally, the proposed amendments remove the requirement that a surveillance employee needs Commission approval if they wish to transfer to other gaming-related positions within the casino within one year of leaving the surveillance department.
- **3772-19-07 – titled “Required surveillance coverage” (amendment)** This rule details the minimum of what is required to be covered by surveillance. The amendments to this rule are both stylistic and remove the specific requirement of surveillance of specific machines that offer a payout of a specific amount, as that is not consistent with industry practices.

- **3772-19-09 – titled “Surveillance reports” (amendment)** This rule requires casino operators to keep surveillance reports of specific events and details the information that must be included with the surveillance. It also requires the Commission to have access to those reports. The rule further requires casino operators to maintain visitors logs of persons who enter the surveillance room other than surveillance employees, IT employees, and employees of the Commission. The amendment removes a prohibition against surveilling Commission personnel while in the casino, as it is unnecessary.

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.

R.C. 3772.03

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 does not apply to these rules because the federal government does not regulate casino gaming in this state. Rather, casino gaming is permitted pursuant to Article XV, Section 6(C) of the Ohio Constitution and is controlled by Ohio’s Casino Control Act (i.e., R.C. Chapter 3772).

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)?

Article XV, Section 6(C) of the Ohio Constitution and R.C. Chapter 3772 require the Commission to ensure the integrity of casino gaming and to prescribe rules for how casino gaming should be conducted, including prescribing technical standards and requirements that are to be met by surveillance equipment, standards and requirements to be met by personnel who are employed at casino facilities, and standards and requirements for the surveillance of casino facilities. These rules and the proposed amendments are designed to continue to effectuate this constitutional and statutory mandate by streamlining requirements for player against player contests, promotions, and advertisements based on years of casino gaming operations in Ohio, and by allowing for more flexibility in casinos’ daily operations without sacrificing necessary regulatory oversight.

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 amended rules in terms of whether they help to ensure the integrity of casino gaming while recognizing the limited practical concerns casino operators face. This can be done in two ways: First, through evaluating

whether the administrative cost of implementing and enforcing the proposed rules outweighs their public benefit. Second, through analyzing the regulated community's comments about requests for amendments to the rules or for waivers or variances from the rules. No such comments have been received on these rules during their review period or in the informal comment opportunities that preceded this filing.

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.

In reviewing these rules, an email was sent to stakeholders on July 31, 2024. (Exhibits A and B). Stakeholders were asked to submit any written comments on the rules 5:00 p.m. on August 14, 2024 (Exhibit A). The stakeholders included employees or casino operators, management companies, holding companies, gaming related vendors, and independent testing laboratories. No written comments from stakeholders were received. Finally, stakeholders had the opportunity to comment during the Commission's public meeting on September 18, 2024. No comments were made.

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

No input was provided by stakeholders.

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 amendments because no scientific data was necessary to develop or measure their outcomes. Instead, Commission staff reviewed how other jurisdictions approached rules regarding casino surveillance. Further, Commission staff considered past practice under the rules as presently written, whether the existing rules were the most efficient means by which to maintain the integrity of casino gaming in this context, and whether any waivers or variances had been requested and granted to the regulated community, all with an eye on its pivot towards regulatory oversight primarily by audit rather than prospective review and approval. In so doing, the Commission was able to use, as much as possible, rules the regulated community is accustomed to within the industry, with minor adaptations to remain in compliance with Ohio law.

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.

Commission staff reviewed the rules adopted in other jurisdictions and the suggestions provided by the stakeholders and other members of the industry. Further, Commission staff considered any waivers or variances to existing rules that had been requested and granted. The amendments are a conglomeration of the rules used in other jurisdictions with adaptations made for Ohio and are, in some cases, the result of discussions between Commission staff and the regulated community, including reflections of existing waivers or present practice.

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

This question does not apply to these amendments because no other regulations in these areas currently exist with respect to casino gaming in this state, over which the Commission has sole authority.

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.

At each casino facility, there are gaming agents and financial auditors observing, evaluating, and investigating the operations. In addition, the Commission's Compliance personnel conduct regular audits to ensure compliance with Ohio law. Any issues that arise will be funneled to the Commission's central office in Columbus, Ohio, where the Executive Director and the division directors can coordinate a consistent response and conduct outreach to the regulated community.

Adverse Impact to Business

15. Provide a summary of the estimated cost of compliance with the rule(s). Specifically, please do the following:

- **Identify the scope of the impacted business community, and**
- **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.

The impacted business community includes casino operators and management companies. The nature of the potential adverse impact from the rules includes fines for noncompliance, costs for employee time and payroll for, among other things, developing internal procedures, training, and sending notifications and reports to the Commission, as well as the potential for other monetary costs to the casino operators. Any adverse impact is justified to govern proper surveillance procedures to ensure the integrity of casino gaming.

However, each casino operator in Ohio already has a comprehensive surveillance system and staff in place to monitor casino gaming and they are already accustomed to operating under the rules as presently written, having done so since the inception of casino gaming in Ohio.

3772-19-01 (amendment), “Definitions.”

This rule sets forth definitions for various terms related to casino surveillance. As such, the Commission does not anticipate an adverse impact.

3772-19-02 (amendment), “Responsibilities of the surveillance department.”

This rule describes what each casino operator must maintain and make available to the commission at all times surrounding surveillance. The nature of the potential adverse impact from the rules is minimal, including costs for employee time and payroll for, among other things, developing internal procedures, training, and sending notifications and reports to the Commission. Therefore, the Commission anticipates a minimal adverse impact.

3772-19-03 (amendment), “Required surveillance system.”

The purpose of this rule is to detail the baseline requirements for each casino's surveillance system, including video camera quality, video monitor capability, and image capturing utility. The proposed amendments streamline requirements for casino operators and also remove password requirements, allowing operators to provide better protection for the system based on the evolution of technology protection. The nature of the potential adverse impact from the rules includes fines for noncompliance, costs for employee time and payroll for, among other things, developing internal procedures, training, and sending notifications and reports to the Commission. Therefore, the Commission anticipates a minimal adverse impact and believes the proposed amendments may reduce regulatory burdens.

3772-19-04 (amendment), “Commission surveillance room and on-site facilities.”

The existing rule requires casino operators to provide an office and equipment room to the Commission for the Commission's exclusive use. The proposed amendments require casino operators to provide an office and equipment to the Commission, as approved by the Executive Director. This will provide more flexibility as Commission needs evolve and may reduce the regulatory burden connected to providing facilities. The nature of the potential adverse impact from the rules includes costs associated with providing the room to the Commission. However, casino operators already provide a room for the Commission's use. Therefore, the Commission anticipates a minimal adverse impact.

3772-19-05 (amendment), “Casino surveillance room.”

The purpose of this rule is to detail minimum specifications for the casino surveillance room, including location of the entrance, limits on access, and minimum surveillance room staff requirements. The amendment removes the requirement that the Executive Director approve entrance to the room, thereby removing a regulatory burden that would require Commission involvement, and providing more autonomy to a casino operator. The nature

of the potential adverse impact from the rules includes fines for noncompliance and costs for employee time and payroll for, among other things, developing internal procedures. As such, the Commission anticipates a minimal adverse impact.

3772-19-06 (amendment), “Surveillance department.”

This rule specifies the minimum requirements for a casino surveillance department. The Commission does not anticipate an adverse impact because it removes regulatory burdens requiring the Executive Director’s approval for a casino operator to divert surveillance resources, as well as the requirement that a surveillance employee needs Commission approval if they wish to transfer to other gaming-related positions within the casino within one year of leaving the surveillance department.

3772-19-07 (amendment), “Required surveillance coverage.”

This rule details the minimum of what is required to be covered by surveillance. The nature of the potential adverse impact from the rules includes fines for noncompliance, as well as the potential for other monetary costs to the casino operators. The Commission anticipates a minimal adverse impact and actually anticipates a reduction in compliance costs because casino operators no longer need to ensure more specific surveillance on a machine with a payoff amount that may not exist.

3772-19-09 (amendment), “Surveillance reports.”

This rule requires casino operators to keep surveillance reports of specific events and details the information that must be included with the surveillance. These are business costs that the casinos have had to comply with in Ohio and other jurisdictions, that include costs for employee time and payroll for, among other things, developing internal procedures, training, and sending notifications and reports to the Commission, as well as the potential for other monetary costs to the casino operators. The Commission anticipates a minimal adverse impact.

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*).

3772-19-02 (amendment), “Responsibilities of the surveillance department.”

The proposed amendments remove duplicative regulations. These changes are made to reduce the number of regulatory restrictions pursuant to S.B. 9 of the 134th General Assembly. The streamlining of Administrative Code rules reduces regulatory burdens and promotes efficiency.

3772-19-03 (amendment), “Required surveillance system.”

The proposed amendments streamline requirements for casino operators and also remove password requirements, allowing operators to provide better protection for its system based

on the evolution of technology protection. Therefore, the Commission anticipates the proposed amendments may reduce regulatory burdens.

3772-19-04 (amendment), “Commission surveillance room and on-site facilities.”

The proposed amendments require casino operators to provide an office and equipment to the Commission, as approved by the Executive Director. This will provide more flexibility as Commission needs evolve and may reduce the regulatory burden connected to providing facilities.

3772-19-05 (amendment), “Casino surveillance room.”

The amendment removes the requirement that the Executive Director approve entrance to the room, thereby removing a regulatory burden that would require Commission involvement, and providing more autonomy to a casino operator.

3772-19-06 (amendment), “Surveillance department.”

The Commission anticipates the proposed amendments will reduce regulatory burdens because a casino will no longer need the Executive Director’s approval to divert surveillance resources. Also, a surveillance employee will have more employment flexibility because they will no longer need Commission approval if they wish to transfer to other gaming-related positions within the casino within one year of leaving the surveillance department, reducing regulatory burdens.

3772-19-07 (amendment), “Required surveillance coverage.”

These proposed amendments may reduce regulatory burdens because casino operators no longer need to ensure more specific surveillance on a machine with a particular payoff amount. It also removes a regulatory restriction pursuant to S.B. 9 of the 134th General Assembly.

3772-19-09 (amendment), “Surveillance reports.”

The proposed amendment will reduce regulatory burdens because it removes a surveillance prohibition. This change is not only made because it is unnecessary, as the Commission is fully transparent and therefore can be surveilled by a casino operator when within the casino, but it removes a regulatory restriction pursuant to S.B. 9 of the 134th General Assembly.

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 Article XV, Section 6(C) of the Ohio Constitution and R.C. Chapter 3772 require the Commission to ensure the integrity of casino gaming, specifically by ensuring casinos establish and adhere to certain standards regarding casino surveillance. Moreover, the regulatory intent justifies any adverse impact because casino gaming is a highly regulated industry. Unregulated gaming poses a threat to the 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, starting with its own internal management and licensing rules covering operators, management companies, and holding companies. Finally, each of the amendments in this package further lessens any business impact, including removing redundant provisions of law.

Regulatory Flexibility

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

Yes (indirectly), though it is unlikely this will be necessary since these regulations only impact businesses in the casino industry, none of which likely constitute a small business. These amendments indirectly provide exemption or alternative means of compliance through Ohio Adm.Code 3772-1-04, which permits the Commission, upon written request, to grant waivers and variances from the rules adopted under R.C. Chapter 3772, including these rules, if doing so is in the best interest of the public and will maintain the integrity of casino 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?

Though it is unlikely R.C. 119.14 will apply to these amendments because the rules only impact businesses in the casino industry, none of which likely constitute a small business, the Commission will adhere to the statutory requirements thereunder, if applicable.

To the extent R.C. 119.14 would apply to a violation of these amendments, 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 further 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 effectively and efficiently regulate casino gaming in this state. As a result, the following resources are available:

- Commission's mailing address:
100 E. Broad Street, 20th Floor, Columbus, Ohio 43215
- Commission's toll free telephone number: (855) 800-0058
- Commission's fax number: (614) 485-1007
- Commission's website: <http://www.casinoccontrol.ohio.gov/>
- Commission's email: info@casinoccontrol.ohio.gov and
- Commission's casino gaming listserv:

<https://ohio.us7.list-manage.com/subscribe?u=1c618d44ec5c718843ae2e7bb&id=3d36674d21>

Also, all members of the regulated community and public may, in accordance with rule 3772-2-04, request to address the Commission during a public meeting. Finally, all members of the regulated community may, pursuant to rule 3772-1-05, request waivers and variances from Commission regulations.

EXHIBIT A

From: [Ohio Casino Control Commission](#)
To: [Berner, Emily](#)
Subject: Casino Gaming Rules for Comment
Date: Wednesday, July 31, 2024 11:10:02 AM

[View this email in your browser](#)



Casino Gaming Stakeholders,

As part of the Ohio Casino Control Commission's ("Commission") efforts to carefully review casino gaming regulations, the Commission is putting forward 8 proposed rule amendments: Ohio Adm. Code 3772-19-01 through 3772-19-07, and 3772-19-09, as well as 2 no change rules: Ohio Adm. Code 3772-19-08 and 3772-19-10, for stakeholder comment. All of the rules are up for their five-year review. The proposed versions of those rules can be found [here](#).

As always, please feel free to forward this communication to anyone else you think may be interested in these rules. 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 at your earliest convenience. If, in the end, you would like to provide formal written comments, please email them to rulecomments@casinocontrol.ohio.gov by 5:00 PM on August 14, 2024.

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.



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EXHIBIT B

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