

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

**ORDER OF RULEMAKING**

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

11 CSR 45-20.270 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 808). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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