

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

**ORDER OF RULEMAKING**

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

11 CSR 45-20.320 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 814–815). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

**SUMMARY OF COMMENTS:** The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received fifteen (15) written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

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

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

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

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

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

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

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

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

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

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

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

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

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

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

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

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

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

(K) Cryptocurrencies; or

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

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

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

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

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

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

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

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

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

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

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

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

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

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

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

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

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

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

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

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

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

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

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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