

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

ORDER OF RULEMAKING

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

11 CSR 45-20.380 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on June 16, 2025 (50 MoReg 819–821). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended July 16, 2025, and the commission held a public hearing on the proposed rule on July 17, 2025. There were three (3) attendees at the public hearing, but no comments were made. The commission received two (2) written comments on the proposed rule. Commission staff made one (1) comment on the proposed rule. The Joint Committee on Administrative Rules made one (1) comment on the proposed rule.

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

RESPONSE AND EXPLANATION OF CHANGE: Agreed and revised.

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

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

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

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

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

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

11 CSR 45-20.380 Internal Control System

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

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