

**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 45-20.480 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 830–833). 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. The Joint Committee on Administrative Rules made three (3) comments on the proposed rule.

**COMMENT #1:** Section (8) – The Joint Committee on Administrative Rules suggested revising as the language gives the commission broad authority.

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

**COMMENT #2:** Sections (8)-(10) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the language to clarify that the voucher validation system may be integrated within the retail sports wagering system, as opposed to a separate system that resides at the sports wagering facility. Specifically, he suggested revising section (9) to state the database “may” reside at the Retail licensee’s facility instead of requiring it to be located at the facility.

**RESPONSE AND EXPLANATION OF CHANGE:** Agreed and revised. Removed section (9) in its entirety. Renumbered the remaining sections.

**COMMENT #3:** Section (12) – Daniel Mulhall, with Fanatics Betting and Gaming, suggested revising the language to allow vouchers to expire one (1) year after the date of issuance.

**RESPONSE:** Vouchers are essentially the patron’s change from a transaction. They are not equivalent to tickets. No changes have been made to the rule as a result of this comment.

**COMMENT #4:** Section (25) – The Joint Committee on Administrative Rules suggested revising the language to make it consistent with 11 CSR 45-20.490 by adding “solid outer walls” and “no windows that can be opened.”

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

**COMMENT #5:** Private Cost Statement – The Joint Committee on Administrative Rules suggested adding a fiscal note to account for the costs of constructing a vault and sportsbook cage and the

cost of employing security officers.

RESPONSE AND EXPLANATION OF CHANGE: Agreed and added a fiscal note for the construction of a vault and sportsbook cage, as well as the employment of two security officers.

## **11 CSR 45-20.480 Retail Sports Wagering Locations and Operations**

(8) The Retail licensee shall ensure the voucher validation system in use at the licensee's facility utilizes an encryption algorithm with a minimum of a 128-bit key size, password protection, or another similarly secure method approved by the commission for files and directories containing critical or sensitive data. The voucher validation system may be integrated within the retail sports wagering system. The voucher validation system shall possess a non-alterable user audit trail. The licensee shall restrict users from viewing the contents of such files and directories, which at a minimum, shall provide for the following:

(9) The Retail licensee shall maintain a system manual that includes the following for the validation of vouchers:

(10) The sports wagering system shall be capable of recording the following information for each voucher:

(11) Vouchers shall not expire in the system and shall have no expiration date printed on them. Vouchers may, on their reverse, contain wording which indicates vouchers that cannot be validated may be considered void.

(12) The internal controls shall include procedures for when a kiosk is unable to print a voucher upon patron request.

(13) Patrons may redeem vouchers at ticket writer windows, wagering kiosks, or redemption kiosks for the specific amount of the voucher.

(14) Cash received by or paid out from a ticket writer window shall be spread on the counter in full view of the patron and within the dedicated surveillance coverage.

(15) The sports wagering system shall prevent a voucher from being redeemed more than once.

(16) A voucher shall only be redeemed the first time it is presented for redemption.

(17) All vouchers redeemed at a ticket writer window shall be forwarded to revenue audit on a daily basis.

(18) Once the validation information is stored in the database, the data may not be altered in any way. No job position shall have system access to view full validation numbers unless approved in the internal control system. Approved positions shall have a segregation of duties, ensuring those positions do not have the ability to redeem vouchers for cash. Any kiosk or system hardware on the kiosk that holds ticket information shall not have any options or methods that would allow for viewing of the full validation number prior to redemption.

(19) The Retail licensee shall maintain a record of “voucher liability” for vouchers that have been issued but not yet redeemed, which shall be stored in the system for not less than five (5) years from the date of issuance of the voucher, provided that—

(20) Vouchers shall not be manually added to the voucher validation system for any reason.

(21) Vouchers shall not be issued by employees.

(22) Each sportsbook cage shall be designed and constructed to provide maximum security for the materials stored and the activities performed therein. Such design and construction shall be approved by the commission.

(23) Each ticket writer station shall contain—

(24) Each Retail licensee shall have a secure location, known as the vault, for the purpose of storing funds to be used in the operation of a sportsbook. The vault shall—

(A) Be a fully enclosed room with solid outer walls and no windows that can be opened, located in an area not open to the public;

(25) All transactions with the vault shall be supported by documentation, except for even exchanges of currency of one hundred dollars (\$100) or less.

(26) All transfers of funds of more than five hundred dollars (\$500) shall be escorted by security and observed by surveillance.

(27) A sportsbook cage shall have an operating balance not to exceed an amount described in the internal controls. Funds in excess of the operating balance shall be transferred to the vault at the end of each shift in a secured, locked container by an employee of the sportsbook cage escorted by a security officer. Prior to transporting the funds, security shall notify surveillance that the transfer will take place. Surveillance shall monitor the transfer. The funds shall be transferred with appropriate documentation.

(28) At the end of each shift, the outgoing vault cashier shall count the vault inventory, record the inventory detail and the total inventory on a vault accountability form, and sign the form. The vault cashier shall also record the opening balance, the amount of each type of accountability transaction, the closing balance, and any variance between the counted inventory and the closing balance.

(29) The assets for which each ticket writer is responsible shall be maintained on an imprest basis. A ticket writer shall not permit any other person to access his or her imprest inventory. A ticket writer shall begin a shift with an imprest amount of currency and coin to be known as the sports wagering inventory. No funds shall be added to, or removed from, the sports wagering inventory during such shift, except—

(30) Retail licensees shall not accept or cash checks.

(31) A sports wagering count sheet shall be completed for the inventory issued to a ticket writer and signed by the sports wagering supervisor, and the following information, at a minimum, shall be recorded thereon at the commencement of a shift:

(32) A ticket writer assigned to a ticket writer station shall, at the beginning of his or her shift, count and verify the sports wagering inventory at the sports wagering vault or other approved location and shall agree the count to the sports wagering count sheet. The ticket writer shall sign the count sheet attesting to the accuracy of the information recorded thereon. The sports wagering inventory shall be placed in a secured ticket writer's drawer, transported directly to the appropriate ticket writer station by the ticket writer. The ticket writer's original sports wagering count sheet shall be placed in and remain in the ticket writer's drawer until the conclusion of the shift. The ticket writer's drawer shall be secured when the ticket writer is not present in the sportsbook.

(33) Whenever funds are transferred from the vault to a ticket writer, the vault cashier responsible for the vault shall prepare a two-part writer transfer-out form. Upon completion of the form, the duplicate shall be retained by the vault cashier and the original shall be retained by the ticket writer. The form shall include, at a minimum, the—

(34) Whenever funds are transferred from the ticket writer to a vault, a two-part writer transfer-in form shall be prepared. Upon completion of the form, the original shall be immediately transferred with the funds to the vault and the duplicate shall be retained by the ticket writer. The form shall include, at a minimum, the—

(35) At the conclusion of a ticket writer's shift, the content in the ticket writer's drawer shall be transported directly to the vault or to a location approved by the commission, where the ticket writer shall count the contents and record the following information, at a minimum, on the sports wagering count sheet:

(36) The sports wagering supervisor shall compare the ticket writer system closing balance to the sports wagering count total, record any over or short amount, and sign the sports wagering count sheet.

(37) If the sports wagering count sheet lists an overage or shortage, the ticket writer and the sports wagering supervisor shall attempt to determine the cause of the discrepancy in the count. If the discrepancy cannot be resolved, such discrepancy shall be reported to the surveillance department and the sports wagering manager or department supervisor in charge at such time. Any discrepancy in excess of five hundred dollars (\$500.00) shall be reported to the commission. The report shall include the following:

(38) The premises where any sports wagering or any sports wagering activity is being conducted shall be open for inspection by the commission.

*REVISED PRIVATE COST: The cost to private entities is an estimated initial cost of \$1,489,200 and an annual cost of \$1,320,000 versus the estimated cost of less than five hundred dollars (\$500) in the aggregate, which was submitted in the original estimate.*