

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

**PROPOSED RULE**

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

*PURPOSE: This rule establishes locations where sports wagering may occur and procedures for operations.*

- (1) Retail sports wagers may only be placed or redeemed in-person at—
  - (A) One or more fixed windows or counters through a ticket writer at the sportsbook cage; or
  - (B) Self-service kiosks of the retail licensee.
- (2) Fixed windows or counters with ticket writers may be operated at any location approved by the commission within a designated retail location on the gaming floor of an excursion gambling boat or in a sports district operated by a Retail licensee.
- (3) Kiosks may be operated within a designated retail location on the gaming floor of an excursion gambling boat or in a sports district operated by a Retail licensee.
- (4) Kiosks shall be supervised by an attendant at all times unless located inside a portion of a sports district restricted to persons twenty-one (21) years of age or older.
- (5) When kiosks are not located within a portion of a sports district restricted to persons twenty-one (21) years of age or older, the attendant shall be responsible for verifying the age of wagerers.
- (6) A kiosk may issue vouchers for unwagered funds deposited in the kiosk. Each voucher design shall be approved by the commission and each voucher shall, at a minimum, contain the following printed information:
  - (A) Licensee's name, retail location's name, city, and state;
  - (B) Kiosk asset number or location identifier that issued the voucher;
  - (C) Date and time (24-hour format acceptable);
  - (D) Alpha and numeric dollar amount of the voucher;
  - (E) Voucher unique identifier;
  - (F) Validation number;
  - (G) Bar code or any machine-readable code representing the validation number; and
  - (H) An indication that the voucher can only be redeemed in exchange for a sports wager or cash.
- (7) Kiosks shall not—
  - (A) Issue or redeem a voucher of more than three thousand dollars (\$3,000);
  - (B) Issue a ticket with a potential payout of more than ten thousand dollars (\$10,000); and
  - (C) Redeem a ticket with a value of more than three thousand dollars (\$3,000).

(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:

(A) The effective segregation of duties and responsibilities of the users with regard to the system to prevent fraudulent redemption and creation of vouchers; and

(B) The automatic monitoring and recording by the system of access by any person to such files and directories.

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

(A) An example of each report and, if applicable, the specific regulation for which the report is used for compliance; and

(B) A list of system codes and the corresponding explanation for each code.

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

(A) Amount of the voucher;

(B) Date, time, and location of issuance;

(C) Unique voucher identifier used for redemption, at least three digits of which shall be masked on all system menus, printed reports, and displays for all unredeemed vouchers; and

(D) Date, time, and location of redemption, if applicable.

(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—

(A) Any unredeemed voucher removed from the system shall be stored and controlled in a manner approved by the commission;

(B) Prior to redemption the complete validation number of the unredeemed voucher shall only be available to the system and the positions approved in the internal controls; and

(C) Any unredeemed voucher which is abandoned, lost, or unclaimed shall be disposed of in accordance with sections 447.500 through 447.595, RSMo, and once delivered to the Missouri State Treasurer shall have its status changed to “redeemed” in the voucher validation system. Vouchers shall not be delivered until at least five (5) years have passed since the date of issuance. The detailed records of any unredeemed vouchers shall not be destroyed until the unredeemed liability has been delivered to the Missouri State Treasurer.

(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—

(A) A ticket writer's drawer and terminal through which financial transactions related to sports wagering will be conducted;

(B) Manually triggered silent alarm systems, which shall be connected directly to the surveillance monitoring room; and

(C) Fixed physical barriers sufficient to prevent unauthorized access, unless funds in excess of twenty thousand dollars (\$20,000) are either secured in a locked drop safe approved by the commission or transferred to the vault;

(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;

(B) Have a metal door with a locking mechanism;

(C) Have an alarm device that signals the surveillance department whenever the door to the vault is opened; and

(D) Have clear, glass-like tables, if the vault is used to count the kiosk drop.

(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—

- (A) In collection of sports wagers;
- (B) In order to make change for a patron buying a ticket;
- (C) In payment of winning tickets;
- (D) In payment for sports wagering vouchers;
- (E) In transfers with the sports wagering vault; or
- (F) To refund a voided or cancelled wager.

(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:

- (A) The date, time, and shift of preparation;
- (B) The denomination of currency and coin in the sports wagering inventory issued to the ticket writer;
- (C) The total amount of each denomination of currency and coin in the sports wagering inventory issued to the ticket writer;
- (D) The sports wagering station number to which the ticket writer is assigned; and
- (E) The signature of the sports wagering supervisor.

(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—

- (A) Date and time of the transfer;
- (B) Designation of the vault location;
- (C) Ticket writer station to where the funds are being transferred;
- (D) Amount of each denomination being transferred;
- (E) Total amount of the transfer;
- (F) Signature of the vault cashier verifying and issuing the funds; and
- (G) Signature of the ticket writer verifying and receiving the funds.

(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—

- (A) Date and time of the transfer;
- (B) Designation of the vault location to where the funds are being transferred;
- (C) Ticket writer station from which the funds are being transferred;
- (D) Amount of each denomination of cash and currency being transferred;
- (E) Total amount of the transfer;
- (F) Signature of the ticket writer verifying and sending the funds to the vault; and
- (G) Signature of the vault cashier verifying and receiving the funds.

(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:

- (A) The date, time, and shift of preparation;
- (B) The denomination of currency, coin, and coupons in the drawer;
- (C) The total amount of each denomination of currency, coin, and coupons in the drawer;
- (D) The total of the writer transfer-out forms;
- (E) The total of the writer transfer-in forms;
- (F) The total amount in the drawer; and
- (G) The signature of the ticket writer.

(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:

- (A) Date;
- (B) Shift;
- (C) Name of the ticket writer;
- (D) Name of the supervisor;
- (E) Station number; and
- (F) Amount of the discrepancy.

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

*AUTHORITY: section 39(g) of Article III, Mo. Const., section 313.004, RSMo 2016, and sections 313.800–313.850, RSMo 2016 and Supp. 2024. Original rule filed May 14, 2025.*