



Common Sense Initiative

Mike DeWine, *Governor*
Jon Husted, *Lt. Governor*

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Business Impact Analysis

Agency, Board, or Commission Name: Ohio Casino Control Commission (“Commission”)

Rule Contact Name and Contact Information: Andromeda Morrison, (614) 387-5616, rulecomments@casinocontrol.ohio.gov

Regulation/Package Title (a general description of the rules’ substantive content):

OCCC Voluntary Exclusion and Compulsive and Problem Gambling Procedures 5YR Ohio Adm.Code 3772-12

Rule Number(s): 3772-12-02, -05, -06, & -07

Date of Submission for CSI Review: 2/2/24

Public Comment Period End Date: 2/16/24

Rule Type/Number of Rules:

New/___ rules

No Change/ 4 rules (FYR? Yes)

Amended/___ rules (FYR? ___)

Rescinded/___ rules (FYR? ___)

The Common Sense Initiative is established in R.C. 107.61 to eliminate excessive and duplicative rules and regulations that stand in the way of job creation. Under the Common Sense Initiative, agencies must balance the critical objectives of regulations that have an adverse impact on business with the costs of compliance by the regulated parties. Agencies should promote transparency, responsiveness, predictability, and flexibility while developing regulations that are fair and easy to follow. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

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Reason for Submission

1. R.C. 106.03 and 106.031 require agencies, when reviewing a rule, to determine whether the rule has an adverse impact on businesses as defined by R.C. 107.52. If the agency determines that it does, it must complete a business impact analysis and submit the rule for CSI review.

Which adverse impact(s) to businesses has the agency determined the rule(s) create?

The rule(s):

- a. Requires a license, permit, or any other prior authorization to engage in or operate a line of business.
- b. Imposes a criminal penalty, a civil penalty, or another sanction, or creates a cause of action for failure to comply with its terms.
- c. Requires specific expenditures or the report of information as a condition of compliance.
- d. Is likely to directly reduce the revenue or increase the expenses of the lines of business to which it will apply or applies.

Regulatory Intent

2. Please briefly describe the draft regulation in plain language.

Please include the key provisions of the regulation as well as any proposed amendments.

The rules presented here are being reviewed pursuant to the state’s rule-review requirement in R.C. 106.03 and are four rules contained in Ohio Adm.Code Chapter 3772-12 (Voluntary Exclusion and Compulsive and Problem Gambling Plan). The rules in this package are being submitted as “no change” rules and do not have any amendments. As bit of background, the rules contained in this package were updated in 2022 to accommodate changes related to the launch of sports gaming. The summaries of the rules for consideration are detailed below.

Voluntary Exclusion Program and Responsible Gambling Plans

- **3772-12-02 (no change), titled, “Ohio VEP application.”** This rule details the method to apply for the Ohio VEP, the minimum lengths of time applicants may select for exclusion, and that if an individual completes the application while impaired then it will be rejected. This rule created an online VEP portal system which can be used to submit an Ohio VEP application. The purpose of this rule is to give patrons who feel they may have a gambling problem the ability to voluntarily exclude themselves for the individual’s selected minimum length of time, aiding in combatting disordered and problem gambling in Ohio. Moreover, the rule, and this Chapter in general, is part of the Commission required rules under both R.C. 3772.03 and 3775.02.

- **3772-12-05 (no change), titled, “Removal from the Ohio voluntary exclusion program.”** This rule prescribes how participants in the Ohio VEP may remove themselves from the program. The rule states that participants will not automatically be removed from the program upon the expiration of the selected exclusion; rather each participant must request removal from the Ohio VEP. This rule allows the Commission to provide educational videos and materials that are incorporated into the Ohio VEP portal for all participants seeking enrollment or removal in the program. The purpose of this rule is to ensure an efficient VEP removal process, while providing for appropriate safeguards, including requiring an individual to make an affirmative choice to opt back into gambling. Moreover, the rule, and this Chapter in general, is part of the Commission required rules under both R.C. 3772.03 and 3775.02.
- **3772-12-06 (no change), titled, “Compulsive and problem gambling plan.”** This rule details the procedures that must be included in each excluded entity’s and excluded facility’s disordered and problem gambling plan, as it relates to their status as an entity regulated by the Commission. This rule provides procedures regarding the implementation and enforcement of the Ohio VEP, providing responsible gambling materials to patrons, and the excluded entity’s and excluded facility’s commitment to preventing underage gambling and gambling by persons who are impaired by drugs or alcohol. In addition, this rule adds those sports gaming excluded entities and facilities to the list of those that must submit the plan. Lastly, the rule clarifies the information which must be provided to the Commission in the quarterly and annual reports. The purpose of this rule is to ensure that excluded entities and facilities are aiding the Commission in productively combatting disordered and problem gambling. Moreover, the rule, and this Chapter in general, is part of the Commission required rules under both R.C. 3772.03 and 3775.02.
- **3772-12-07 (no change), titled, “Prior voluntary exclusions.”** This rule is a grandfather provision that allows participants who joined the OCCC VEP prior to March 1, 2019, and have not yet sought removal, to continue their exclusion from only the four casino facilities. If the individual chooses to join the Ohio VEP, the length of exclusion the individual indicates on the Ohio VEP application supersedes the individual’s previously selected length of exclusion and expands the list of excluded properties to include all excluded entities and facilities. The rule allows participants of the “Ohio VEP” who joined after March 1, 2019, and prior to the effective date of this rule, and have not sought removal, to continue their participation and voluntary exclusion from only the four casino facilities and seven video lottery terminal facilities in the state of Ohio. The rule allows individuals to

still join the updated Ohio VEP and the length of exclusion the individual indicates on the updated Ohio VEP application supersedes the individual's previously selected length of exclusion and expands the list of excluded properties to include the excluded entities and facilities which are casinos, sports gaming facilities, or online sports pools. This will allow individuals to make affirmative choices as to what gambling they may be able to engage in responsibly and does not change the rules of their original commitment with the state. The purpose of this rule is to maintain the Commission's commitment to currently existing voluntarily excluded individuals and Ohio VEP participants, while providing them with the opportunity to participate in the updated Ohio VEP, upon an informed decision. Moreover, the rule, and this Chapter in general, is part of the Commission required rules under both R.C. 3772.03 and 3775.02.

3. Please list the Ohio statute(s) that authorize the agency, board or commission to adopt the rule(s) and the statute(s) that amplify that authority.

R.C. 3772.01, 3772.18, 3772.03, 3772.033, 3775.02, 3775.13

4. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?

If yes, please briefly explain the source and substance of the federal requirement.

Not Applicable.

5. If the regulation implements a federal requirement, but includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

This question is not applicable because the federal government does not regulate casino gaming or sports gaming in this state. Rather, casino gaming is permitted pursuant to Article XV, Section 6(C) of the Ohio Constitution and is controlled by Ohio's Casino Control Act (i.e., R.C. Chapter 3772). Sports gaming is permitted and controlled by Ohio's Sports Gaming Control Act (i.e., R.C. Chapter 3775).

6. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

R.C. Chapters 3772 and 3775 require the Commission to ensure the integrity of casino gaming and sports gaming and to prescribe rules for how casino gaming and sports gaming should be conducted, including rules related to responsible gaming. It is imperative to protect casino and sports gaming patrons by establishing a combined sports gaming voluntary exclusion program and ensure that all casino and sports gaming proprietors are promoting responsible gambling and implementing the statutorily required voluntary exclusion program through implementation of the Ohio VEP.

7. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

Overall, the Commission will measure the success of these rules in terms of whether they help the Commission meet its statutory mission to ensure the integrity of casino and sports gaming. This can be done in two ways: first, through evaluating whether the public benefit of implementing and enforcing these rules outweigh their administrative and business costs. And second, through analyzing the regulated community's comments about requests for amendments to the rules or for waivers or variances to or from the rules.

8. Are any of the proposed rules contained in this rule package being submitted pursuant to R.C. 101.352, 101.353, 106.032, 121.93, or 121.931?

If yes, please specify the rule number(s), the specific R.C. section requiring this submission, and a detailed explanation.

No.

Development of the Regulation

9. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

In reviewing these rules, an email was sent on December 20, 2023, to over 100 stakeholders on the Commission's casino gaming listserv and sports gaming listserv. (Exhibits 1 and 2). Stakeholders were asked to submit any written comments on the rule by 5:00 p.m. on January 3, 2024. (Exhibit 1.) These stakeholders included employees or representatives from casino operators, sports gaming proprietors, management companies, holding companies, gaming-related vendors, and independent testing laboratories. No written comments from stakeholders were received. Commission staff began the formal filing process, including consideration at the Commission's public meeting on January 17, 2024. No comments were made.

10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

The Commission did not receive comments from stakeholders.

11. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

This question does not apply to these rules because no scientific data was necessary to develop or measure their outcomes. Instead, Commission staff reviewed its statutory mandates and looked at how other jurisdictions approached the rule topics in this package. Further, staff considered whether existing rules were the most efficient means by which to maintain the integrity of casino gaming and sports gaming and whether any requests for amendments, waivers, or variances had been requested or granted to the regulated community. In so doing,

the Commission was able to use, as much as possible, rules the regulated community is accustomed to in other jurisdictions, with minor adaptations to remain in compliance with Ohio law.

- 12. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives? *Alternative regulations may include performance-based regulations, which define the required outcome, but do not dictate the process the regulated stakeholders must use to comply.***

Commission staff carefully reviewed and considered the statutes and rules adopted in other jurisdictions. In reviewing these statutes and rules, staff considered past practices of the Commission in its other regulatory frameworks, any stakeholder comments, and the current trends in the sports gaming regulatory environment. As such, these rules are a conglomeration of the rules used in other jurisdictions with adaptations made for Ohio law and current industry trends.

- 13. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?**

This question does not apply to these rules because no other regulations in these areas currently exist with respect to casino gaming and sports gaming.

- 14. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.**

The Commission ensures any issues that arise are funneled through the respective division director and vetted with the Legal Division before being brought to the Executive Director, so that he can coordinate a consistent response and have staff conduct outreach to the regulated community. The rules in this package largely relate to responsible gambling and specifically voluntary exclusions. Many of these are handled by the Commission's Director of Problem Gambling Services at the Commission. Any issues that arise at the facilities are funneled to the Commission's central office in Columbus, Ohio, where the Director of Problem Gambling Services and legal staff work with the Executive Director to coordinate a consistent response and conduct outreach to the regulated community.

Adverse Impact to Business

- 15. Provide a summary of the estimated cost of compliance with the rule(s). Specifically, please do the following:**

- a. Identify the scope of the impacted business community, and**

The regulated business community consists of all persons who may conduct casino gaming and sports gaming in Ohio, including operators, proprietors, services providers, suppliers,

as well as those providing responsible gambling prevention and treatment services in the state. These include Ohio's professional sports teams and events, casinos and racinos, as well as small retail establishments, gaming-related supply or service companies, sportsbook operators, and Ohio's counselors, doctors, and prevention specialists.

b. Quantify and identify the nature of all adverse impact (e.g., fees, fines, employer time for compliance, etc.).

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a representative business. Please include the source for your information/estimated impact.

Casino gaming and sports gaming entities will also incur costs and employee time and payroll related to the submission and adherence to responsible gambling plans, aimed at lowering the costs of Ohio's needed responsible gambling prevention and treatment services. Casino gaming and sports gaming entities may also face fines for noncompliance.

16. Are there any proposed changes to the rules that will reduce a regulatory burden imposed on the business community? Please identify. (*Reductions in regulatory burden may include streamlining reporting processes, simplifying rules to improve readability, eliminating requirements, reducing compliance time or fees, or other related factors*).

The rules contained in this package do not contain any amendments or proposed changes. Thus, there are no changes to any regulatory burden on the business community.

17. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The regulatory intent justifies any adverse impact because Article XV, Section 6(C) of the Ohio Constitution, R.C. Chapter 3772, and R.C. 3775 require the Commission to ensure the integrity of casino gaming and sports gaming, specifically by licensing, regulating, investigating, and penalizing those involved in casino gaming and sports gaming. Moreover, R.C. Chapters 3772 and 3775 give the Commission broad authority to adopt rules that cover topics such as voluntary exclusion. As such, any business impact is justified as statutorily contemplated.

Moreover, the regulatory intent justifies any adverse impact because casino gaming and sports gaming are highly regulated industries and are accustomed to detailed regulations in every jurisdiction. Unregulated gaming poses a threat to public welfare and raises the potential for fraud and abuse. To mitigate these threats, the Commission, like other gaming regulatory bodies, is using its regulatory authority to establish a best practice framework in consultation with the regulated community.

Regulatory Flexibility

18. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

Yes (indirectly), though it is unlikely this will be necessary since these regulations mainly impact businesses in the casino and sports gaming industry, none of which likely constitute a small business. These amendments indirectly provide exemption or alternative means of compliance through Ohio Adm.Code 3772-1-04 or 3775-1-04 which permit the Commission, upon written request, to grant waivers and variances from the rules adopted under R.C. Chapter 3772 or 3775 including these rules, if doing so is in the best interest of the public and will maintain the integrity of casino gaming or sports gaming in the State of Ohio.

19. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

To the extent R.C. 119.14 would apply to a violation of these rules, the Commission will provide verbal and written notification to the small business to correct the paperwork violation. Thereafter, the Commission would allow the small business a reasonable amount of time to correct the violation. The Commission and its staff would also offer any additional assistance necessary to aid in remediation of the violation. No administrative action would be taken unless the small business fails to remedy the violation within the reasonable time allotted by the Commission.

20. What resources are available to assist small businesses with compliance of the regulation?

The Commission and its staff are dedicated to working with members of the regulated community and the public to effectively and efficiently regulate sports gaming in this state. As a result, the following resources are available:

- Commission's mailing address: 100 E. Broad St., 20th Floor, Columbus, OH 43215
- Commission's toll-free telephone number: (855) 800-0058
- Commission's fax number: (614) 485-1007
- Commission's sports gaming webpage:
<https://casinocontrol.ohio.gov/sportsgaming.aspx>, including FAQs, staff's presentation on HB 29 and the rule making process, and all currently available draft regulations.
- Commission's email: info@casinocontrol.ohio.gov
- Commission's sports gaming listserv:
<https://casinocontrol.ohio.gov/sportsgaming.aspx>

From: [Metzler, Tessa](#)
To: [Kerscher, Martin](#)
Subject: FW: Casino Gaming Rules for Comment
Date: Tuesday, January 16, 2024 3:26:13 PM

Exhibit 1

From: Ohio Casino Control Commission <Jessica.Franks@casinocontrol.ohio.gov>
Sent: Wednesday, December 20, 2023 5:23 PM
To: Metzler, Tessa <Tessa.Metzler@casinocontrol.ohio.gov>
Subject: Casino Gaming Rules for Comment

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Casino Gaming Stakeholders,

As you may know, Ohio law generally requires rules to be reviewed and refiled at least once every five years. Pursuant to that requirement, the Commission is putting forward four no change rules: Ohio Adm. Code 3772-12-02, -05, -06, and -07 for stakeholder comment. The proposed versions of those rules can be found [here](#).

As always, please feel free to forward this communication to anyone else you think may be interested in these rules. If you would like to unsubscribe from this listserv, you may do so using the link located at the bottom of this email.

We understand that you may have questions or would like additional information before commenting, and if that is the case, we encourage you to reach out to your normal contacts at the Commission at your earliest convenience. **If, in the end, you would like to provide formal written comments, please email them to rulecomments@casinocontrol.ohio.gov by 5:00 PM January 3, 2024.**

While you will have some additional chances to comment on these rules, including when they are filed with the state's Common Sense Initiative Office, please note that it is much easier for the Commission and for stakeholders to work out any questions or comments directly before the rules start the formal rule filing process.



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Ohio Casino Control Commission
100 East Broad Street
20th Floor
Columbus, OH 43215

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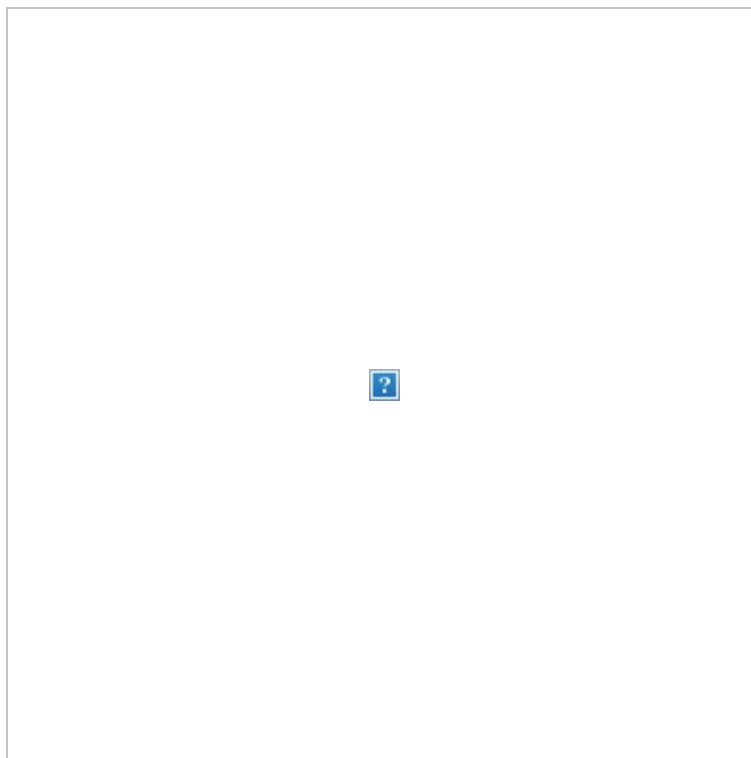
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From: [Ohio Casino Control Commission](#)
To: [Kerscher, Martin](#)
Subject: Casino Gaming Rules for Comment
Date: Wednesday, December 20, 2023 5:37:07 PM

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Sports Gaming Stakeholders,

As you may know, Ohio law generally requires rules to be reviewed and refiled at least once every five years. Pursuant to that requirement, the Commission is putting forward four no change rules: Ohio Adm.Code 3772-12-02, -05, -06, and -07 for stakeholder comment. The proposed versions of those rules can be found [here](#).

As always, please feel free to forward this communication to anyone else you think may be interested in these rules. If you would like to unsubscribe from this listserv, you may do so using the located at the bottom of this email.

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Exhibit 2

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Fisher
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Shuck
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Goldfarb
Delfosse
Oakes
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Winchell
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Johnson

Organization

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Brooks, Pierce, McLendon, Humphrey & Leonard, LLP

Stern

BetMGM

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RUSH STREET INTERACTIVE, LP

MGM Northfield Park

Mac Murray & Shuster

MGM Resorts

Ohio Lottery Commission

Jack Entertainment

Commonwealth Gaming

Brooklands Bar, LLC

Giant Eagle

OneComply

Ferguson Legal Group LTD

Hard Rock Digital

Cincy Sports Law and Biz

fuboTV

MGM Northfield Park

1 ROGUE INC.

The Ridge Golf & Gardens

GDC Group (Gambling.com)

FC Cincinnati

Ohio Department of Taxation

FanDuel

Fox Rothschild LLP

Darkside Management Ltd.

Casino City Press

RealTime Fantasy Sports

BetMGM

Betfred Sports

Zaino Hall and Farrin LLC

Double Down Enterprises LLC

OhioMHAS

Caesars

HOPE in Fostoria

TWO SISTERS TAVERNS INC

Ohio Department of Taxation

OCCC

Sports Wagering Advisory Council

DraftKings
North Carolina Education Lottery

DIDJOS
1404 W 29th LLC DBA Jukebox
Catena Media
Toledo-Lucas County Plan Commissions
Mark Elliott Radio

MGM
Fraternal Order of Eagles
bet365
Delaware North
IGT

Covers.com
Bose McKinney & Evans LLP and Bose Public Affairs Group
MGM Northfield Park
Public Sector Consulting, LLC
Kambi
DraftKings
Tipico USA Technology Inc.
J&J Ventures Gaming of Ohio, LLC
Penn Entertainment
Ohio Casino Control Commission
Gleason Law Office LLC
Duane Morris
John Brooks Recovery Center
Legal Sports Report
HSDW
Miami Valley Gaming
The CJR Group, Inc.

Intralot
Sportradar
gioffre & schroeder
Catena Operation Ltd
American Gaming Association
SuperBook
GDC Group
IGT
City of Brunswick Ohio - Brunswick, OH
Cincinnati Income Tax Division
WCPO
BetMGM
The Batchelder Company
Five dogs LLC

Cleveland Guardians
PointsBet
GeoComply
Hard Rock Casino

Crain's Cleveland Business

Penn Interactive - Barstool Sportsbook
Ice Miller LLP
bet365
Up A Creek Bar & Grille
Castellini Management Company
Corridor Consulting
Regology
OCCC
United Tote
jennie may inc

Casinosoft
Branch pizza
Preserve Insurance Agency
Magic Tree
10TV
Taft Stettinius & Hollister LLP
Betfred Sports
NASCAR
Trustly, Inc.
Hollywood Casino Columbus
GAN

Jack Entertainment
Graydon Head & Ritchey LLP
Cleveland Avenue Cafe
Ohio Restaurant Association
Icemiller
Better Collective USA, Inc.
Saiber, LLC
SimpleBet
Hall of Fame Village
Kambi Sweden AB
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AWS
Kegler Brown Hill + Ritter
Miami Valley Gaming
kitty's Sport Grill LLC
Google
Betfred Sports

Hard Rock Digital
Ohio Lottery Commission
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OCCC
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Gray Television
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J & T Harter Enterprises LLC
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Cleveland Guardians
OhMHAS
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FanDuel
Ohio Lottery Commission
Ohio Lottery
BPOE 797 Elks Lodge
Gaming Laboratories International LLC
MGM Northfield Park
Vela Wood P.C.
PlayOhio.com
Capitol Edge Consulting
Brownstein Hyatt Farber Schreck LLP
PointsBet

DraftKings Inc.
OCCC
Taft Law
Meta
KPMG
The Ohio Lottery Commission

PGNO
SIS Content Services Inc.
FanDuel
Brewfontaine
Currently an Ohio citizen with partners planning on applying for a type B and A license.
IDology
a1 beverages inc.

IMG Arena US, LLC

Calfee
Cincinnati Public Radio - WVXU
Fox Rothschild, LLP
BetOH.io
Ohio Department of Taxation
Independent
Towne Tavern
ZwillGen PLLC
Underdog
Covers
Heathers Coffee & Cafe
Caesars Entertainment
Cleveland Magazine
Boom Shakalaka, Inc.
Frosty mug sports bar
Towne Tavern
Twin Lakes Golf Course and Restaurant
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A3designs
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Ribacka Media
Gamewise
Ballard Spahr
WynnBET
iDEA Growth
GBQ Partners
Gongwer News Service
McCarthy, Lebit, Crystal & Liffman Co., LPA
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McCulloch, Felger, Fite & Gutmann Co. L.P.A.
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Kindred Group Plc - Unibet Interactive Incorporated

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GeoComply

Entertainment
Rush Street Interactive
RMD Portfolios LLC
OneComply
Novomatic Americas Sales LLC
Vorys Advisors
Integrity Compliance LLC
SCCG Management
Ohio Department of Taxation

GAN
MGM Resorts International
VIXIO GamblingCompliance
The Wall Street Journal
Skybox Sports Network
Cocca's Pizza
Townhall II
Trimac Advisors
Flannery Georgalis, LLC
McKinley Strategies

Bally's Interactive

PlayUSA.com
State of Ohio - Lottery
Highbridge Consulting
Na
The Akron Beacon Journal/USA Today
SuperBook
Saiber
Digital Gaming Corporation
Bassett's Market
Bell Gaming LLC
Nelson Government Strategies
betohio.com
The Daily Standard
TwinSpires
Run of the Mill Tavern

Kambi
Calfee Halter & Griswold LLP
Ohio State Bar Association
OCCC
JACK Entertainment
OCCC
Catena Media
ADAMH Board of Franklin County

Fanatics Betting & Gaming
LegalSportsReport/Catena Media
Gambling.com Group
Sapphire Risk Advisory Group
OCCC
Underdog
Mcbills Beverage R. C. brothers inc
Catena Media
Ohio Catholic Federal Credit Union
BetMGM
PlayUp
BetMGM
OpenBet
Tipico

Ohio Lottery Commission
Churchill Downs Interactive Gaming
Hollywood Casino Toledo
Betfred
13abc Action News
Rush Street Interactive
Blackhawk Network
Whiteman Osterman & Hanna LLP
The Blasdel Group
Betfred Sports USA
Blackhawk Network
Walter Haverfield LLP
Hensel Grad P.C.

Mass Gaming Commission
Recovery Resources
Attorney
Caesars Entertainment-Caesars Sportsbook
Tipico
Eilers and Krejcik Gaming, LLC
SBC
Hard Rock Casino Cincinnati

Penn National Gaming Inc
McKinley Strategies
DGC
Department of Taxation
Ohio Department of Taxation

VIXIO GamblingCompliance
bank
DGC

BetMGM
Saiber LLC
GAMING1
SuperBook Sports
Gambling.com
BetMGM
SuperBook Sports dba SBOPco, LLC
Armbruster Energy Stores
Bose McKinney and Evans
BetMGM, LLC
Brouse McDowell
Internet Vikings
Elys Game Technology
DraftKings
PlayOhio.com
Taft
Iron Gate Gaming
CapCity Strategic Communications LLC
Consultant
Ifrah Law
Bet365
Haslam Sports Group
Backyard Bar LLC
Catena Media
BBB
Hall of Fame Resort & Entertainment Co.
Westfield Insurance
Bose McKinney & Evans LLP
Shaffer Entertainment
17007 Lorain Avenue Inc
Department of Taxation
Hard Rock Cincinnati.
Hollywood gaming Dayton Raceway

Compliable
Thomas P. Pappas & Associates
DraftKings Inc.
Ohio Legislative Service Commission
BetMGM
bet365
Underdog Sports
Hahn Loeser & Parks LLP
Law firm
Taft
Bricker & Eckler
Cleveland.com
Columbus Blue Jackets

Bettenders

Sean P. Dunn & Associates

Caesars Digital

DSD Advisors, LLC

Parlay Sporting Club + Kitchen

better collective

Hard Rock Casino Cincinnati

Fox Rothschild LLP

Investor

OHIO CASINO CONTROL COMMISSION

Bennett Enterprises

Government Advocates

PlayUSA

Georges Media Group

LegalSportsReport/Catena Media

Gambling.com

MGM Northfield Park

Ulmer & Berne LLP

Ohio Lottery

The CJR Group, Inc.

University of Cincinnati - Athletics

Coolidge Wall Company

Byers, Minton & Associates

Capitol Advocates

GBGD

OCCC

The Foundry

Miami Valley Gaming and Racing

bet365

Ozzys Nottingham Pub

Downtown Johnnys

Ohio Department of Taxation

Student Services

Fanatics

Penn Interactive

Cheviot News

OCMA

KFP Black Forest Pub, LLC

Ohio Department of Taxation

Recovery Resources

BMM Testlabs

SportsHub Games Network

PwC

G & E market, llc.
Baldwin Wallace University
Bleachers Sports Grill
Fanatics Betting & Gaming
Fiserv
Columbus Blue Jackets
COLE KEPRO INTERNATIONAL
Ohio citizen
Catena Media
Betfred USA Sports
Fanatics Betting and Gaming
Cleveland Indoor Golf

Taft, Stettinius & Hollister

Ohio Department of Taxation
Government Strategies Group
OsuWitt, LLC
PointsBet
Corporate Management Group, LTD.
Sports Handle
Blue Laser Digital
MGM
penn national gaming
Cleveland Browns/Columbus Crew
Tipico Sportsbook

Montgomery County ADAMHS Board
Chud's Inc.
Local Thyme, LLC
Subworx
Cleveland Cavaliers
Hammer Time Pub, LLC
Mac Murray & Shuster
BetMGM
Greater Columbus Sports Commission
ISI Sports
Farikal Corp
Global Sustainable Technology & Development

Bally's Corporation
Keating Muething & Klekamp PLL
JACK Entertainment
Hollywood Gaming Dayton Raceway
Gaming Laboratories International
Duane Morris LLP
Kallner & Associates

Sun Indian Creek
North American Bancard
Gaming Today
Ohio Casino Control Commission

Sean P. Dunn & Assoc. LLC
On Tap Grille and Bar
Miller Companies
XLMedia
Government Edge

N/A
MCC
Playtech
Ohio Lottery
Vast Solutions
cleveland.com / The Plain Dealer
The Patio
AIM Media Midwest, LLC
Bloomberg Tax
WKRC TV
magdalenas bar and grill

Gaming Intelligence
BetMGM
Catena Media

888

action palace ohio, llc
GI Enterprises LLC
MCESC
Ohio State Bar Association
Ohio Association of Broadcasters
Michael Best & Friedrich
JB Hamlin
betparx
SBC Americas
Prevention Action Alliance
SportsHandle/Better Collective
None
Memories Food & Spirit
USA TODAY Network Ohio Bureau
PayPal
Ballard Spahr
Weston Inc.

TAPPP
Marshall Melhorn
Dyve ltd
MGM
The Business Journal of Youngstown
Kegler Brown Hill + Ritter
US Betting Report
Buffalo Wild Wings
Shift4 Payments

Sportradar
The Pub
Penn National Gaming.
Heitner Legal, P.L.L.C.
Sportradar
BetMGM
bet365
Gaming Intelligence
FanDuel
IGT
Business Journals
Bally's Interactive
Ohio Lottery
Better Collective
PlayUSA
Buzz Capital
Davidsons Restaurant
Rock Creek Kitchen and Bar
Kambi
Light & Wonder
GeoComply Solutions Inc.

Odds On Compliance
Marown Holdings Limited
Brennan, Manna & Diamond
Ohio Sportsbook League
OhioMHAS
Governmental Policy Group, Inc.
Hollywood Gaming Mahoning Valley
Ohio Casino Control Commission
MGM Northfield Park
Columbus Blue Jackets
Granary Way Media LLC
Novomatic AG
Origo Branding
bet365
Bet365

NEA Consulting
Gambling.com Group
NFL Integrity Representative
Problem Gambling Network of Ohio
Sandusky County Public Health
Kiatta Saloon

ESPN
IGT
GeoComply
Cleveland Guardians

Ohio Lottery Commission
Hard Rock Cincinnati
The Hedge Sports
BMM TESTLABS
Ohio Lottery Commission
United Tote Company
Caesars

MGM
NelsonMullins
Ohio Department of Commerce
na
Rushstreet Interactive
Government Strategies Group
Ohio Department of Taxation

iGaming Capital LLC
HOPE in Fostoria
Bet Sports Ohio llc
Milligans pub
Digital Gaming Corporation USA
Shumaker
USAbility Digital Europe Limited
Amazon Web Service
OCCC

Belterra Park Cincinnati - Boyd Gaming Corporation
Blank Rome LLP
The LCADA Way
NEA Consulting
Amazon
Stabones Sports and Gaming
Robbins Alloy Belinfante Littlefield LLC
Canton Repository
Caesars

DraftKings
Doura-Schawohl Consulting LLC
BetMGM
Draftkings

The Kroger Co
Ifrah Law
OHHA
Fansuite Entertainment Inc
PointsBet
EDF Compliance
Ohio Lottery Commission
Maverick Consulting
Ohio Department of Taxation

bet365
Zepf Center
IBIA
Civicpoint LLC
The Times-Picayune | The Advocate
Ohio Casino Control Commission
Shawn's Irish Tavern
Mr. Ed's Bar and Grill and Cameo Sport Park and Kitchen
BetMGM

penn national gaming
BetMGM
Hard Rock Digital

Graphic Village
Boyd Gaming
Kambi
Keating Muething & Klekamp PLL
US Integrity
Irish Bobb's Inc
NeXT Sports Betting License Consultants
Ohio Department of Taxation
Ascendant Public Policy Group
Rarefied Atmosphere, Inc
JACK Entertainment
Taft Law
KP Law
bet365
Tuckers Tavern
Wright Bet
BDO USA
Miami University

L and P Amusement
JACK
C.R. Festivals, LLC
GAN Nevada
RCE Midwag Tavern, Inc.
Hall of Fame Resort & Entertainment Co.
Ohio Lottery Commission
BetMGM
Fantini Research
Casino City Press
West Church Social
Caesars
VIXIO Regulatory Intelligence
The Hedge Sports
Law Firm

PointsBet
Yahoo Sports
Xavier University

Ohio Casino Control Commission
Fantini Research
MGM Resorts International
FanDuel
Columbus Blue Jackets
DraftKings
MGM Northfield Park
N/A
Fanatics
MVM209 Media LLC
ShoeBet
Penn Interactive
FanDuel
Recovery Resources
BetMGM
Hard Rock Casino
FanDuel

Circa Sports
OBeP Payments, LLC
Circa Sports LLC
SBC
MGM Resorts Int.
DraftKings
VIXIO GamblingCompliance
Sleeper
VIXIO

Betr
Hall of Fame Resort & Entertainment Company
Derivco
Christianson Companies