



# Common Sense Initiative

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

Joseph Baker, *Director*

## 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):

Sports Gaming Use or Lose Amendments

Rule Number(s): 3775-4-02 (amendment), 3775-4-03 (amendment), 3775-4-04 (amendment), 3775-4-05 (amendment), 3775-4-06 (amendment)

Date of Submission for CSI Review: June 7, 2024

Public Comment Period End Date: June 21, 2024

**Rule Type/Number of Rules:**

New/ 0 rules

No Change/ 0 rules (FYR? N/A)

Amended/ 5 rules (FYR? No)

Rescinded/ 0 rules (FYR? N/A)

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 proposed amendments give the Commission the option to revoke the licenses if proprietors have not actively offered sports gaming to patrons within the last year, or if providers have not actively offered sports gaming to the benefit of the state within the last year, removing the requirement that the license automatically be revoked. The amendments additionally add that proprietors and providers cannot apply to renew their licenses if they have not actively offered sports gaming in the preceding license year and must wait one year after the license's expiration before seeking another license.

- **3775-4-02, titled "Type A sports gaming proprietor licensure."** This rule governs the application and licensure of type A sports gaming proprietors. The rule states that these applicants must complete any applicable forms, pay an application fee of one hundred and fifty thousand dollars, and establish their suitability by clear and convincing evidence. In evaluating an applicant, the Commission will consider several statutory factors and factors common in the gaming industry, including factors related to preferences, suitability, and economic development. The rule also recognizes a statutory exception for appointing professional sports organizations, allowing designee operators to establish certain factors on their behalf. Finally, the rule outlines certain statutory requirements licensees must undertake upon licensure, including payment of license fees and a surety bond to ensure all annual-installment license fees are made. The purpose of this rule is to implement R.C.

sections 3775.03, 3775.04, and 3775.041 and to ensure that only eligible, suitable, and otherwise qualified persons are operating online sports pools in Ohio.

- **3775-4-03, titled “Type B sports gaming proprietor licensure.”** This rule governs the application and licensure of type B sports gaming proprietors. The rule states that these applicants must complete any applicable forms, pay an application fee of twenty thousand dollars, and establish their suitability by clear and convincing evidence. In evaluating an applicant, the Commission will consider several statutory factors and factors common in the gaming industry, including factors related to preferences, suitability, and economic development. In reviewing these economic development factors, the Commission, in conjunction with the Department of Development, must ensure that the applicant’s economic development is significant in the county in which they would like to locate a sports gaming facility. The rule also recognizes a statutory exception for appointing professional sports organizations, allowing designee operators to establish certain factors on their behalf. Finally, the rule outlines certain statutory requirements licensees must undertake upon licensure, including payment of license fees and a surety bond to ensure all annual-installment license fees are made. The purpose of this rule is to implement R.C. sections 3775.03, 3775.04, and 3775.041 and to ensure that only eligible, suitable, and otherwise qualified persons are operating sports gaming facilities in Ohio.
- **3775-4-04, titled “Type C sports gaming proprietor licensure.”** This rule governs the application and licensure of type C sports gaming proprietors. The rule states that these applicants must complete any applicable forms, pay an application fee of fifteen thousand dollars, and establish their suitability by clear and convincing evidence. In evaluating an applicant, the Commission will consider several statutory factors and factors common in the gaming industry, including those related to suitability and economic development. In addition, the rule outlines certain statutory requirements licensees must undertake upon licensure, including payment of license fees and a surety bond to ensure all annual-installment license fees are made. Lastly, the rule requires licensees to enter a valid a contract with the state lottery commission to operate lottery sports gaming pursuant to Chapters 3770 and 3775 of the Revised Code. The purpose of this rule is to implement R.C. sections 3770.24, 3775.03, 3775.04, and 3775.041 and to ensure that only eligible, suitable, and otherwise qualified persons are operating sports gaming self-service or clerk-operated sports gaming terminals in Ohio.
- **3775-4-05, titled “Mobile management services provider licensure.”** This rule governs the application and licensure of mobile management services providers (“MMSP”). The rule states that these applicants complete any applicable forms, pay an application fee of

one hundred and fifty thousand dollars, and establish their suitability by clear and convincing evidence. In evaluating an applicant, the Commission will consider several statutory factors and factors common in the gaming industry, largely echoing the suitability requirements in the state’s Casino Control Law (R.C. Chapter 3772). Pursuant to statute, the rule makes a distinction between first and second designated MMSPs, requiring that second designated MMSPs, in conjunction with their proprietor, prove an incremental economic benefit to the state to be issued a license. The rule also recognizes the statutory appointing professional sports organization exception by requiring that MMSPs that are serving as a designee operator for those organizations ensure sufficient guardrails are in place to segregate the professional sports organization from the operation of sports gaming. Next, the rule outlines certain statutory requirements licensees must undertake upon licensure, including payment of license fees and a surety bond and that the MMSP and their proprietor enter into and maintain a contract by which the MMSP may offer sports gaming on behalf of the proprietor. This contract must include a description of what duties each party is responsible for. The rule, pursuant to R.C. 3775.05(E), sets a maximum number of MMSP licenses a person may have at four and sets the application fee for those subsequent applications at seventy-five thousand dollars—recognizing the Commission will not need to do additional licensing work for the subsequent licenses, but will have additional expenses related to ensuring the ongoing compliance requirements. The “use or lose” provision of this rule gives the executive director the authority to take action against a MMSP licensee that has not actively offered sports gaming to the economic benefit of the state under the license for a period of one year or more. The purpose of this rule is to implement R.C. sections 3775.03, 3775.04, 3775.041, and 3775.05 and to ensure that only eligible, suitable, and otherwise qualified persons are operating online sports pools in Ohio—through approved agreements with licensed type A sports gaming proprietors.

- **3775-4-06, titled “Management services provider licensure.”** This rule governs the application and licensure of management services providers (“MSP”). The rules states that these applicants complete any applicable forms, pay an application fee of twenty thousand dollars, and establish their suitability by clear and convincing evidence. In evaluating an applicant, the Commission will consider several statutory factors and factors common in the gaming industry, largely echoing the suitability requirements in the state’s Casino Control Law (R.C. Chapter 3772). The rule also recognizes the statutory appointing professional sports organization exception by requiring that MSPs that are serving as a designee operator for those organizations ensure sufficient guardrails are in place to segregate the professional sports organization from the operation of sports gaming. Next, the rule outlines certain statutory requirements licensees must undertake upon licensure, including payment of license fees and a surety bond and that the MSP and their proprietor enter into and maintain a contract by which the MSP may offer sports gaming on behalf of

the proprietor. This contract must include a description of what duties each party is responsible for. Finally, the rule, pursuant to R.C. 3775.051(E), sets a maximum number of MSP licenses a person may have at twelve and sets the application fee for those subsequent applications at ten thousand dollars—recognizing the Commission will not need to do additional licensing work for the subsequent licenses, but will have additional expenses related to ensuring the ongoing compliance requirements. The purpose of this rule is to implement R.C. sections 3775.03, 3775.04, 3775.041, and 3775.051 and to ensure that only eligible, suitable, and otherwise qualified persons are operating sports gaming facilities in Ohio—through approved agreements with licensed type B sports gaming proprietors.

**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. 3775.01, 3775.02, 3775.03, 3775.04, 3775.041, 3775.05, 3775.051, and 3775.09.

**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 sports gaming in this state. Rather, 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. Chapter 3775 requires the Commission to ensure the integrity of sports gaming and to prescribe rules for how sports gaming should be conducted, including rules related to licensing, the approval of sports gaming equipment, and the approval of wager and event types. To ensure the integrity of sports gaming and requirements of R.C. Chapter 3775, it is imperative to protect sports gaming patrons by ensuring sports gaming is conducted only by eligible and suitable persons.

**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 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.*

Stakeholders have been engaged on the “use or lose” requirements for nearly a year, including discussions with staff and review of previous Commission action on November 15, 2023, extending the “use or lose” deadline by six months. Stakeholders were also provided with an informal comment period on the subject amendments on April 26, 2024, with a comment deadline of May 7, 2024. See Exhibits A and B for a copy of the informal stakeholder outreach as well as a list of contacted stakeholders.

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

One comment was received. See Exhibit C. Although the Commission did not make changes to the draft rules as a result of the comment, the Commission did engage with the stakeholder to provide further information and clarification.

**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 the Commission’s statutory mandates, the rules currently in effect in its other regulatory frameworks, and looked at how other jurisdictions approached the topics in these rules. This included several jurisdictions stakeholders themselves recommended to the Commission, including New Jersey, Arizona, Colorado, Michigan, Indiana, and Illinois. Additionally, as outlined above, staff also reviewed, considered, and used the comments of stakeholders in developing these rules. 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 and the Commission’s general procedures.

**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 particular those jurisdictions listed in Question 11. 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. R.C. 3775.04, R.C. 3775.05, and R.C. 3775.051 require licensees to offer sports gaming to patrons within one year. If sports gaming is not offered for a continuous period of one year, the Commission may take steps to revoke the license. Due to the demand for licenses, the number of licenses issued has not met the threshold amount the Commission is able to issue and therefore the need for an automatic revocation is not currently necessary. Hence, the rule was drafted, and is being amended, with adaptations 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 largely does not apply to this rule because it is being amended to make a procedural change. There are no other regulatory agencies in Ohio with licensing responsibility for sports gaming. Additionally, when the rule was originally adopted, no other regulations in these areas currently existed with respect to sports gaming and the Commission reached out to and worked closely with several of the other named agencies in HB 29 (of the 134<sup>th</sup> General Assembly) to ensure that the Commission did not promulgate rules or standards that conflict with or encroach upon the regulatory authority of other Ohio agencies.

**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. Specifically, those issues related to licensing are handled by the Commission’s licensing staff, which is overseen by a single director in the Commission’s central office. And any issues related to compliance are managed by the Commission’s compliance staff, again overseen by a single director in the Commission’s central office. Moreover, the issuance, denial, or sanctioning of any license (other than the issuance of provisional licenses) can only be approved by the Commission at a public meeting through a vote. Therefore, the regulated community can expect consistent and transparent licensing and compliance decisions.

**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 Type A, B, and C proprietors, as well as mobile management services providers and management services providers. These include

Ohio's professional sports teams and events, casinos and racinos, as well as retail establishments, and sportsbook operators.

**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.*

The Commission, again, anticipates a business impact from this required licensing rule, relating to the payment of an application and license fee, payment of a surety bond, and the submission of an application and information necessary to ensure the Commission can evaluate the statutory factors for licensure. License fees are, again, statutorily set, but the Commission is given the ability to set both the application fee and surety bond amount.

However, the amendments proposed in the rules will have a positive impact on business. Under current regulations, the Commission must revoke a license if the holder does not offer sports gaming for a continuous period of a year. The proposed amendments give the Executive Director the discretion, rather than the duty, to revoke a license after one year of not offering sports gaming, so license holders will have more opportunity to offer sports gaming in this state.

**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 proposed changes in this rule will reduce the regulatory burden imposed on the business community because the licenses issued under these rules are good for five (5) years (Type A sports gaming proprietor, Type B sports gaming proprietor, mobile management services provider, and management services provider) or three (3) years (Type C sports gaming proprietor). The rules, as written, require the licenses to be revoked after a provider or proprietor does not actively offer sports gaming for one year. Under the proposed amendment, the Commission would no longer be required to revoke a license after one year, giving the proprietor or provider more time to offer sports gaming without losing a license, easing a regulatory and financial 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 Commission anticipates a business impact from these required licensing rules, relating to the payment of an application and license fee, payment of a surety bond, and the submission of an application and information necessary to ensure the Commission can evaluate the statutory factors for licensure. License fees are statutorily set, but the Commission is given the ability to set both the application fee and surety bond amount. The fees are needed and justified



to cover the Commission's costs related to investigating the application and ensuring the applicant meets the ongoing compliance requirements of the statute and rules for either the five or three-year licensure period. Since all these impacts are statutorily required, or at least statutorily authorized, and are necessary for the Commission to ensure the integrity of sports gaming, these business impacts are justified. However, since these rules have already been in effect the proposed amendment may actually benefit the regulated business community, as the Commission has the option instead of the requirement to revoke a license after one year of a business not offering sports gaming, potentially lessening the adverse impact on the community.

### **Regulatory Flexibility**

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

Yes, these rules provide exemption or alternative means of compliance through Ohio Adm. Code 3775-1-04, which permits the Commission, upon written request, to grant waivers and variances from the rules adopted under R.C. Chapter 3775, including these rules, if doing so is in the best interest of the public and will maintain the integrity of 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 Street, 20<sup>th</sup> Floor  
Columbus, Ohio 43215
- Commission's toll free telephone number: (855) 800-0058
- Commission's fax number: (614) 485-1007
- Commission's website: <http://www.casinocontrol.ohio.gov/>

- Commission's email: [info@casinocontrol.ohio.gov](mailto:info@casinocontrol.ohio.gov) and [sportsgaming@casinocontrol.ohio.gov](mailto:sportsgaming@casinocontrol.ohio.gov)

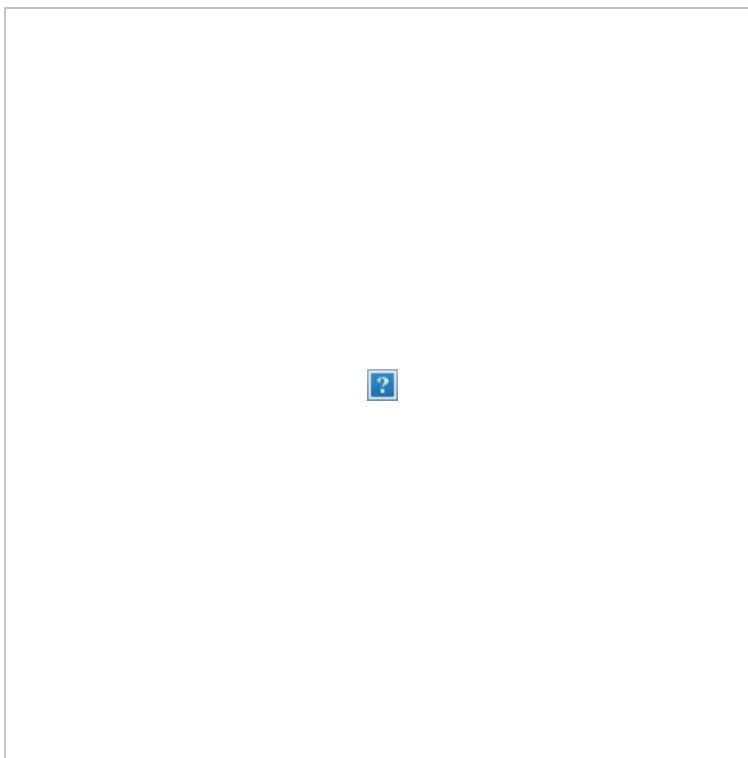
Also, all members of the regulated community and public may, in accordance with rule 3772-2-04, request to address the Commission during a public meeting. Finally, all members of the regulated community may, pursuant to rule 3775-1-04, request waivers and variances from Commission regulations.

# EXHIBIT A

**From:** [Ohio Casino Control Commission](#)  
**To:** [Metzler, Tessa](#)  
**Subject:** Sports Gaming Rules for Comment  
**Date:** Friday, April 26, 2024 4:58:44 PM

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Sports Gaming Stakeholders,

The Ohio Casino Control Commission is proposing amendments to Ohio Adm. Code 3775-4-02 through 3775-4-06. The scope of the amendments are to address the “use or lose” requirements in R.C. 3775.02 for Type-A, -B and -C Proprietors, Management Services Providers, and Mobile Management Services Providers, by providing greater flexibility to the Executive Director up to the length of the license period in determining whether to revoke a sports gaming license. Further, the amendments provide that a licensee is not eligible for renewal if they do not operate sports gaming at any point during the license term. The proposed amendments can be viewed [here](#).

**If you would like to provide formal written comments on these amendments, please email them to [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov) by 5:00 p.m., Tuesday,**

**May 7, 2024.**

As always, please feel free to forward this communication to anyone else you think may be interested.

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# EXHIBIT B

	A	B	C
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# EXHIBIT C

## **HALL OF FAME** RESORT & ENTERTAINMENT CO.

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Tara K. Charnes, General Counsel  
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May 7, 2024

Matthew T. Schuler  
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**RE: HOF Village Newco, LLC Type A & B Sports Gaming Proprietor Licenses**  
**License/Endorsement Numbers: PROA.000021 & PROB.000020**

Dear Mr. Schuler,

I am sending this communication to the Ohio Casino Control Commission (“Commission”) in response to your request of April 26, 2024 seeking comment to proposed “use or lose” license amendments to the Ohio Administrative Code §§ 3775-4-02 through 3775-4-06.

From our perspective, the proposal to modify “will” to “may” that will give the Executive Director discretion to take action is a positive change. The revision will permit the Executive Director to consider all of the facts and circumstances for a particular sports gaming proprietor licensee, which we deem as positive.

In contrast, the addition of a one year waiting period to reapply for licensees who did not actively offer sports gaming to the economic benefit of the state during the preceding license term is detrimental for smaller betting companies and proprietors who are attempting in good faith to create a unique experience and drive local revenue. The addition of a waiting period effectively removes smaller companies, who are already operating on thin margins, from the market and prevents them from competing with large sports betting operators. Additional support for removal of the waiting period section is included below.

By way of background, HOF Village Newco, LLC (“Newco” or “Company”) holds Type A and Type B Sports Gaming Proprietor licenses through the Commission. Both licenses were issued on December 31, 2022 and will expire on December 31, 2027. With respect to the Type A license, Newco partnered, and has an ongoing relationship with a mobile management service provider, Instabet (a/k/a betr), (“betr”). To date, Newco has paid \$837,500 to the Commission for its Type A license- \$150,000 representing the application fee, \$500,000 upon license issuance, plus the 2024 renewal fee of \$187,500. To date, Newco has paid \$130,000 to the Commission as a Type B sports gaming proprietor that is also a Type A sports gaming proprietor- \$20,000 representing the application fee, \$100,000 upon license issuance, plus the 2024 renewal fee of \$10,000. These threshold administrative fees do not include significant compliance costs, legal costs, operating costs, marketing/advertising costs, insurance and taxes.



In April of 2023, Newco provided notice to the Commission that it had mutually agreed to terminate its relationship with its Type B retail partner. To date, no bets have been placed under Newco's Type B license and the Company continues to search for a viable retail sports betting partner.

When the Company's licenses were originally obtained, Ohio had a ten percent (10%) tax rate on sports betting. In June of 2023, the Senate amended, and subsequently approved, a House budget bill resulting in the Governor signing a 2024-2025 biennial budget that doubled the tax rate to twenty percent (20%). The new tax rate was effective July 1, 2023 and creates challenges for smaller betting companies and proprietors. The significant increase within seven months of legalizing sports betting was not the future market small operators had projected and negatively impacted the attractiveness of bringing new sports betting business to Ohio.

In December of 2023, the Commission extended the year-long deadline for approved licensees to begin operations. The original deadline of January 1, 2024 was extended by six months to June 30, 2024.

From Newco's position, our conviction to using our Type B sports gaming proprietor license has not wavered. Despite termination of the contract with our original retail partner, Newco remains fully committed to securing an appropriate partner and operating a unique and high-quality retail sports book on our Hall of Fame Village campus. Newco has maintained open communication with the Commission regarding efforts to secure a replacement partner for the operation of the planned retail sportsbook and will commit to ongoing transparency. We have learned the ability of the Company to find a suitable partner in this current environment is not solely within the control of the licensee.

Newco has spent several millions of dollars developing the retail sports book facility on campus and the necessary infrastructure around it. The core and shell of the retail sports book building on our campus is complete. Operators have recognized our vision, unique brand partnerships, and sports and entertainment experiences that maximize growth and fan engagement. Furthermore, Newco has invested in AI software that provides valuable insight into visitor traffic and certain publicly available demographic information. This technology enables us to (a) have a more complete picture of traffic, (b) discover new business opportunities, and (c) tailor our strategies to the evolving landscape of the sports betting industry.

While we have garnered significant interest from reputable operators, we have yet to finalize or enter into a definitive term sheet with a replacement partner. Numerous operators have indicated they see great value in our vision and the experience we are building around the Professional Football Hall of Fame. However, the same operators have expressed concern about the economic viability of investing in another retail sports book in light of changing market conditions, including the low percentage of handle achieved across the existing retail sports books (compared to mobile sports betting), as well as the post-launch increase in the applicable tax rate. As a result of recent feedback received from betting operators, Newco is prepared to be flexible and scale according to the needs of the betting operator. Newco will continue to actively follow up and pursue any viable opportunities that involve leveraging the existing Type B license.

For Newco, the opportunity to offer a retail sportsbook is about much more than the revenue associated with retail sports betting. It is a critical component of our strategic vision and what we are building in Canton, Ohio – a one-of-a-kind, unique and high-quality sports and entertainment destination. The Company believes this is critically important to the City of Canton, Stark County, and the broader region. We remain committed to diligently pursuing the opportunity and appreciate the Commission’s opportunity to comment on the proposed revisions.

We appreciate the opportunity to provide this response and the Commission’s ongoing commitment to industry feedback. Please do not hesitate to contact me should you have questions or require any additional information.

Many Thanks,

*Tara K. Charnes*

Tara K. Charnes  
General Counsel

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