



# Casino Control Commission

Mike DeWine  
*Governor*

Thomas J. Stickrath  
*Chair*

## NOTICE OF PUBLIC HEARING

A public hearing will be held by the Ohio Casino Control Commission (“Commission”) on **January 15, 2025, at 1:00 p.m.** at its main office, located at 100 E. Broad Street, 20<sup>th</sup> Floor, Columbus, Ohio 43215. The purpose of the hearing is to solicit public comment on the rules contained in ERF package number 205870, the summaries of which are below.

All interested parties are invited to attend the hearing and present testimony. Written comments may also be submitted to the attention of Andromeda Morrison, General Counsel and Director of Skill Games, Ohio Casino Control Commission, at 100 E. Broad Street, 20<sup>th</sup> Floor, Columbus, OH 43215, or by electronic mail at [rulecomments@casinocontrol.ohio.gov](mailto:rulecomments@casinocontrol.ohio.gov).

---

### Rule Summaries

- **3772-19-01 – titled “Definitions” (amendment)** This rule defines certain terms used throughout Ohio Adm.Code 3772-19 that are not defined elsewhere in the Administrative Code. The amendment removes the definition of “[d]irector of surveillance” because the same term is given a definition in Ohio Adm.Code 3772-10-03.
- **3772-19-02 – titled “Responsibilities of the surveillance department” (amendment)** This rule describes what each casino operator must maintain and make available to the commission at all times surrounding surveillance. This includes, but is not limited to, an interactive electronic floor plan showing locations of surveillance equipment, system components, and casino surveillance procedures. The rule also requires a surveillance department to receive and monitor certain slot machine alerts and that system modifications and upgrades are submitted to the executive director. The amendment removes the requirements that a casino submit plans for monitoring detention rooms and keep a surveillance retention schedule, and also removes that the surveillance system is subject to audit or testing by the commission at any time without notice. Casinos are still subject to retention requirements pursuant to 3772-19-08 and audits and testing pursuant to R.C. Chapter 3772.

100 E. Broad Street – 20<sup>th</sup> Floor – Columbus, OH 43215  
(855) 800-0058 toll-free  
[www.casinocontrol.ohio.gov](http://www.casinocontrol.ohio.gov)

- **3772-19-03 – titled “Required surveillance system” (amendment)** The purpose of this rule is to detail the baseline requirements for each casino's surveillance system, including video camera quality, video monitor capability, and image capturing utility. The amendments to the rule streamline requirements with other rules. It also allows casinos to use any mechanism to ensure security, such as multi-factor authentication, fingerprints, or other appropriate security methods that may develop as technology evolves.
- **3772-19-04 – titled “Commission surveillance room and on-site facilities” (amendment)** The existing rule requires casino operators to provide an office and equipment room to the Commission for the Commission’s exclusive use. It also specifies that the offices and rooms are used by the Commission to monitor and record activity at the casino facility. In line with established practice, the amendments require casino operators to provide an office and equipment to the Commission for the Commission’s use, as approved by the Executive Director.
- **3772-19-05 – titled “Casino surveillance room” (amendment)** The purpose of this rule is to detail minimum specifications for the casino surveillance room, including location of the entrance, limits on access, and minimum surveillance room staff requirements. The amendment removes the requirement that the Executive Director approve entrance to the room and leaves the responsibility for approval solely with the director of surveillance to streamline authorization and to reflect industry practices.
- **3772-19-06 – titled “Surveillance department” (amendment)** The purpose of this rule is to detail minimum specifications for the casino surveillance department, including the responsibilities of the Director of Surveillance and surveillance employee training. The proposed amendments streamline the rule’s language. They also remove the unnecessary restriction that the Executive Director’s approval is necessary for a casino operator to divert surveillance resources. Finally, the proposed amendments remove the requirement that a surveillance employee needs Commission approval if they wish to transfer to other gaming-related positions within the casino within one year of leaving the surveillance department.
- **3772-19-07 – titled “Required surveillance coverage” (amendment)** This rule details the minimum of what is required to be covered by surveillance. The amendments to this rule are both stylistic and remove the specific requirement of surveillance of specific machines that offer a payout of a specific amount, as that is not consistent with industry practices.
- **3772-19-09 – titled “Surveillance reports” (amendment)** This rule requires casino operators to keep surveillance reports of specific events and details the information that must be included with the surveillance. It also requires the Commission to have access to those reports. The rule further requires casino operators to maintain visitors logs of persons who enter the surveillance room other than surveillance employees, IT employees, and employees of the Commission. The amendment removes a prohibition against surveilling Commission personnel while in the casino, as it is unnecessary.