



# 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](mailto: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Rescinded/\_\_\_ rules (FYR?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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[CSIPublicComments@governor.ohio.gov](mailto:CSIPublicComments@governor.ohio.gov)

### **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., 20<sup>th</sup> 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](mailto: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

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**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](mailto: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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You are receiving this email because the Ohio Casino Control Commission identified you as a casino gaming stakeholder.

**Our mailing address is:**

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20th Floor  
Columbus, OH 43215

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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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Eclipse

Eclipse

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Aleah Page

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kgarza@zepfcenter.org  
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Sarah  
Brianne  
GRACE  
Erika  
James  
Brooke  
Michelle  
Renee  
Jeremy  
Amanda  
Eric  
ANGELA  
Mike  
ron  
Kyle  
Matt  
Kelly  
Jason  
Joe  
Judi  
Caty  
Mike  
Jeremy  
Candyce  
Ricky  
matt  
Saba  
william  
Thomas  
Mark  
Ryan  
Joseph  
Nick  
Matthew  
Julie  
Julio  
Catherine  
Jonathan  
Nikki  
Ed  
Alexandra  
Aaron  
Peter  
Scott  
Raj  
Michael  
Nicole

Koch  
Doura-Schawohl  
Moat  
Kirk  
Tabler  
Murphy  
Cohen  
Mancino  
Hutchings  
Rosenberg  
Frank  
MCCRACKEN  
Ruffing  
pottorf  
Jones  
king  
Garza  
Foley-Train  
Ewig  
Terzotis  
Abbott  
Shroyer  
Fitzgerald  
Knowles  
Crum  
spitnale  
Asgedom  
sattler  
Chetsko  
Weinstein  
Soultz  
Meehan  
Simon  
Holt  
Janczewski  
Soriagalvarro  
DeRose  
Petrea  
Llorca  
Dick  
Van Dusen  
Monk  
Wolff  
Bornyk  
Shah  
Feiszli  
Hoyer

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PressReleases@casinocitytimes.com  
brianhoylive@gmail.com  
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hundlecj@gmail.com  
mwilson@smithillner.com  
esechrist@orrick.com  
complianceus@pointsbet.com  
mcheek@yahoosports.com  
christopherg@xavier.edu  
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john.o'brien@casinocontrol.ohio.gov  
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cpohl@mgmresorts.com  
andrewwinchell@gmail.com  
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samalonso@mgmnorthfieldpark.com  
logan@lindsell.org  
jscott@fanatics.com  
MikeMc2017@gmail.com  
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Tara  
Matthew  
Kevin  
Hannah  
Jarrod  
brian  
Frank  
Zachary  
Cody  
Michael  
Erica  
Compliance  
Meredith  
Greg  
Deidre  
John  
Laura  
Chandler  
Andrew  
Cameron  
Bill  
Samantha  
Logan  
Jillian  
Michael  
Teray  
Brandon  
Michael  
August  
Matthew  
Tim  
Nicolas  
Ashala  
Greg  
Elma  
Daurean  
Justin  
Jeremy  
Bryan  
Chris  
Amber  
Allegra

Jolly  
Reinhard  
Jansen  
Chapman  
Vizineau  
Charnes  
Clever  
Laguerre  
Wilmarth  
LeBlanc  
Hoy  
Nunez  
Birnbaum  
Hundley  
Wilson  
Sechrist  
Department  
Yu  
Christopher  
Douglas  
O'Brien  
Briggs  
Pohl  
Winchell  
Scholvin  
Curtis  
Alonso  
Lindsell  
Scott  
McCormick  
Perry  
Henriksen  
Maglietta  
Browning  
Barrack  
Hensley  
Soto  
Smith  
Goldberg  
Hallberg  
Sloan  
Byers  
Aultman  
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kate.machard@derivco.co.za  
sjohnson@christiansoncompanies.com

Andrew  
Steven  
Kate  
Steve

Winchell  
Grenier  
Machard  
Johnson

## Organization

### Personal

Brooks, Pierce, McLendon, Humphrey & Leonard, LLP

Stern

BetMGM

ZAK PAK INC DBA DOOG HOUSE BAR & GRILL

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  
OCCC  
AWS  
Kegler Brown Hill + Ritter  
Miami Valley Gaming  
kitty's Sport Grill LLC  
Google  
Betfred Sports

Hard Rock Digital  
Ohio Lottery Commission  
Brooks, Pierce, McLendon, Humphrey & Leonard, LLP  
OCCC  
Regology  
Gray Television  
Gold Rush Gaming  
Prophet Exchange  
Intralot  
J & T Harter Enterprises LLC  
Blue Ocean Realty, LLC.  
Cleveland Guardians  
OhMHAS  
Tipico  
Buckeye lake brewery  
Sightline Payments  
PreventionFIRST!  
Ifrah Law PLLC  
Catena Media  
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  
Fox Rothschild, LLP  
A3designs  
GAN Limited  
DraftKings  
Caesars  
Advance Local Media  
Elys Game Technology Corp.  
betparx  
National Restaurant Assn  
Ribacka Media  
Gamewise  
Ballard Spahr  
WynnBET  
iDEA Growth  
GBQ Partners  
Gongwer News Service  
McCarthy, Lebit, Crystal & Liffman Co., LPA  
Tammy's Tavern

McCulloch, Felger, Fite & Gutmann Co. L.P.A.  
WEWS-TV  
Kegler Brown Hill + Ritter  
Stateside  
UFPM  
MGM  
Orrick  
BetMGM  
Orrick, Herrington & Sutcliffe  
Rush Street Interactive  
Live! Casino & Hotel

bet365  
Blank Rome LLP  
Cooper Levenson, PA  
Ohio Dept. of Taxation  
PlayOhio  
Penn  
Fanatics Betting & Gaming  
PGNO  
Hensel Grad P.C.  
NASCAR  
GAN  
Government Edge  
Cincinnati Reds  
Finally Hear  
hard rock digital

Kindred Group Plc - Unibet Interactive Incorporated

Fanatics  
GLI  
MGM Resorts International  
Sunday Creek Horizons  
Better Collective  
City of Cincinnati  
CHW Advisors  
Ohio Department of Taxation  
Jock MKT  
Hannah News Service  
Ohio Lottery Commission  
Edelman Law  
Ohio Department of Taxation.  
Jeff DeLeone & Associates  
Kambi  
Dickinson Wright PLLC  
Caesars Sportsbook  
Tipcio  
PointsBet  
PGA TOUR  
Fpdm holdings llc  
Delaware North  
ELYS  
Playtech  
Ziggy's  
Wyncroft Strategies  
U.S. Integrity, Inc.  
VSiN  
Creekside Inn

Rush Street Interactive  
High Bridge Consulting  
JACK Entertainment  
Association of Independent Colleges and Universities of Ohio  
Cleveland Cavaliers

Front Office Sports  
University of Cincinnati  
Caesars Sportsbook  
Ice Miller  
ODJFS OCS  
cleveland.com  
WCMH-TV  
Gaming Laboratories International  
FanDuel  
Rush Street Interactive  
Rich Lanes, Inc.  
Casino City Press  
FanDuel  
PlayUp  
Fox Rothschild LLP  
DeLeone & Associates  
Fifth Third Bank  
SharpRank Inc  
Cincinnati Reds  
Caesars Digital  
Rush Street Interactive  
Problem Gambling Network of Ohio  
OpusNext LLC  
Cleveland Guardians

Tegna  
Haslam Sports Group  
Cosgrove Jonhenry Law & Policy  
Recreational gambler  
Ohio Lottery Commission  
Wells Fargo  
BETMGM

Fanatics  
RETIRED  
private  
Attorney  
Gambling.com  
MGM Northfield Park  
MGM Resorts International  
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 Midway 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 Gambling Compliance  
Sleeper  
VIXIO

Betr

Hall of Fame Resort & Entertainment Company

Derivco

Christianson Companies