



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Rescinded/ 0 rules (FYR?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.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

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 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 rule 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 134th 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, 20th 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 and 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

[View this email in your browser](#)



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 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
1	Email Address	First Name	Last Name
2	danny.cross@catenamedia.com	Danny	Cross
3	millsap@rushstreetinteractive.com	Lani	Millsap
4	justinremschneider@boydgaming.com	Justin	Remschneider
5	jpfought@gmail.com	Justin	Fought
6	jwidmer@cincinnati.bbb.org	Jaimi	Widmer
7	Joshua.kirschner@nelsonmullins.com	Joshua	Kirschner
8	renee@mancinolaw.com	Renee	Mancino
9	Steven.Grenier@HOFVillage.com	Steven	Grenier
10	robmillar@miller-companies.com	Rob	Miller
11	steve.pastorino@bhnetwork.com	Steve	Pastorino
12	david.purdum@espn.com	David	Purdum
13	sbond@brouse.com	Stephen	Bond
14	kgarza@zepfcenter.org	Kelly	Garza
15	steve.osborne@usabilitydigital.com	Steve	Osborne
16	activmonk@gmail.com	MONK	Hines
17	dastolfo@business-journal.com	Guy	Dastolfo
18	kyle.palmer@hrccincinnati.com	Kyle	Palmer
19	kristal.rovira@trustly.com	Kristal	Rovira
20	kgsstr@yahoo.com	Kevin	Smith
21	iqi.note3@gmail.com	J	C
22	meredith.stutz@UChealth.com	Meredith	Stutz
23	meredyth.romalis@playup.com	Meredyth	Romalis
24	kfpblackforest@gmail.com	Rick	King
25	stevox@amazon.com	Stephen	Exley
26	samalonso@mgmnorthfieldpark.com	Samantha	Alonso
27	nsimon@kmlaw.com	Nick	Simon
28	mcerrezuela@adamhfranklin.org	Monica	Cerrezuela
29	jolly_michael@sbcglobal.net	Michael	Jolly
30	cverich@ohiobrewing.com	Chris	Verich
31	kbj7177@yahoo.com	Kyle	Jones
32	mf@ibia.bet	Matt	Fowler
33	danny.crook@hardrockdigital.com	Danny	Crook
34	thomas.smith@fanduel.com	Thomas	Smith
35	brett.calapp@ballys.com	Brett	Calapp
36	RyanSoultz@boydgaming.com	Ryan	Soultz
37	michael.crawford@hofvillage.com	Michael	Crawford
38	hannah.kennish@playtech.com	Hannah	Kennish
39	aandark@gmail.com	Mark	Williamson
40	alex@betfanatics.com	Alex	Smith
41	Zahra@preserveagency.com	Zahra	Emamhosseini
42	rafael.verde@pngaming.com	Rafael	Verde
43	john@skyboxsportsnetwork.com	John	Jost

	A	B	C
44	cjhuda@gmail.com	Chris	Huda
45	julia.meleshkova@geocomply.com	Julia	Meleshkova
46	mweinstein@graphicvillage.com	Mark	Weinstein
47	rdove@keglerbrown.com	Robert	Dove
48	mark.elliott@markelliottradio.com	Mark	Elliott
49	jtortora@bluejackets.com	John	Tortora
50	info@granarywaymedia.com	D	Weischadle
51	jabady@columbusports.org	Jason	Abady
52	r.mcadoo@gaminglabs.com	Robert	McAdoo
53	jason.culek@lottery.ohio.gov	Jason	Culek
54	fivedogsllc@yahoo.com	Eric	Kacvinsky
55	s.maldonado@elysgame.com	Stephen	Maldonado
56	bmraikes@yahoo.com	Barbara	Taylor
57	markets@endzin.com	Nathan	Dodd
58	mjalandoni@flannerygeorgalis.com	Matthew	Jalandoni
59	casey.flowers@hrccincinnati.com	Casey	Flowers
60	dflowers@goldstrike.com	David	Flowers
61	matt.schuler@casinocontrol.ohio.gov	Matt	Schuler
62	thepatio1950@gmail.com	michael	Lauletta
63	angela.mccracken@lottery.ohio.gov	ANGELA	MCCRACKEN
64	nweiss@cleguardians.com	Neil	Weiss
65	hoyerng@miamioh.edu	Nicole	Hoyer
66	justin.byers@sbcgaming.com	Justin	Byers
67	lwithey@americangaming.org	LaVonne	Withey
68	matteberling@sternadvertising.com	Matt	Eberling
69	kimhelton06@gmail.com	Kim	Helton
70	mbuckley@mgmresorts.com	Matt	Buckley
71	Joseph.meehanjr@kambi.com	Joseph	Meehan
72	normanfrenette@yahoo.com	Norman	Frenette
73	m.robins@gaminglabs.com	Mike	Robbins
74	oliver.clarke@bet365.com	Oliver	Clarke
75	tcost.trc@gmail.com	Travis	cost
76	lemon@rushstreetinteractive.com	Andy	Lemon
77	joe.scalzo@crain.com	Joe	Scalzo
78	lrankin@caesars.com	Lisa	Rankin
79	joegambish@gmail.com	Joe	Gambish
80	psicuso@boselaw.com	Philip	Sicuso
81	stevecocca@sbcglobal.net	Steve	Cocca
82	joe@outthegate.com	Joseph	Brennan
83	jscott@fanatics.com	Jillian	Scott
84	doug@pscoho.com	Doug	Talbott
85	LUtz@delawarenorth.com	Lauren	Utz
86	joshua.croup@13abc.com	Josh	Croup

	A	B	C
87	Keith.O'Korn@casinocontrol.ohio.gov	Keith	O'Korn
88	mostrowski@ohiobar.org	Margaret	Ostrowski
89	mbrennan@lovelandexcavating.com	Matthew	Brennan
90	nsquires@delawarenorth.com	Neil	Squires
91	jobryant@cjrgroup.net	Jay	O'Bryant
92	d.lobo@sportradar.com	Daniel	Lobo Guerrero
93	ian.litherland@lottery.ohio.gov	Ian	Litherland
94	tessa.metzler@casinocontrol.ohio.gov	Tessa	Metzler
95	rob.oconnor@betmgm.com	Rob	O'Connor
96	Pharbin@fanatics.com	Pam	Harbin
97	lisapowers@jackentertainment.com	Lisa	Powers
98	john@trimacadvisors.com	John	McClelland
99	jimmy@spdunn.com	Jimmy	Wolf
100	aafrazier@restaurant.org	Aaron	Frazier
101	dustin@underdogfantasy.com	Dustin	Cooper
102	jeremy.kolman@betmgm.com	Jeremy	Kolman
103	dfisher@northwitt.com	David	Fisher
104	amanda.rosenberg@pointsbet.com	Amanda	Rosenberg
105	nicholas.beare@catenamedia.com	Nick	Beare
106	aberger@duanemorris.com	Adam	Berger
107	jchapman@gan.com	Jennifer	Chapman
108	mnorton@farmersstate-oh.com	Melanie	Norton
109	jim@theridgegolf.com	James	Cox
110	rebecca.lewis@mcesc.org	Rebecca	Lewis
111	mcorbett@calfee.com	Maryellen	Corbett
112	meghan.lacorte@underdogfantasy.com	Meghan	La Corte
113	Matthew.waters@catenamedia.com	Matthew	Waters
114	lcox@rushstreetinteractive.com	Laura	McAllister Cox
115	nicholson@rushstreetinteractive.com	Tommy	Nicholson
116	Deborah.Matthews@flgaming.gov	DEBORAH	MATTHEWS
117	Jayme.McCall@casinocontrol.ohio.gov	Jayme	McCall
118	rneville@reds.com	Rick	Neville
119	scott.anderson@mha.ohio.gov	Scott	Anderson
120	Larry.Henry@gdcgroup.com	Larry	Henry
121	jromero-villanueva@hobbsstrauss.com	Jordan	Romero-Villanuev
122	atrumanskvor@thelcadaway.org	Ashley	Truman-skvor
123	eddick@jackentertainment.com	Ed	Dick
124	mid1834tav@yahoo.com	Jason	Harter
125	jeff@937law.com	Jeff	Ferguson
126	info@rockcreekbar.com	anthony	grassia
127	cameron@onecomply.com	Cameron	Conn
128	jacqueline.vokoun@playup.com	Jacks	Vokoun
129	shutchison@mgmnorthfieldpark.com	Sean	Hutchison

	A	B	C
130	liv.biesemans@kindredgroup.com	Liv	Biesemans
131	hkamen@advancelocal.com	Howard	Kamen
132	r.hoffman@draftkings.com	Becky	Hoffman
133	teresarodgers@jackentertainment.com	Teresa	Rodgers
134	bill.speros@gdcgroup.com	WILLIAM	SPEROS
135	jjiloty@nascar.com	Jordan	Jiloty
136	christopherg@xavier.edu	Greg	Christopher
137	dageorge@bellmusicco.com	David	George
138	michael.speciale@betmgm.com	Michael	Speciale
139	michael.baxter@intralot.us	Michael	Baxter
140	chad@thebatchco.com	Chad	Hawley
141	jewig@civic-point.com	Joe	Ewig
142	atobias@cleveland.com	Andrew	Tobias
143	linda@casinosoftusa.com	Linda	Tobin
144	marsha.brusgard@digitalgamingcorp.com	Marsha	Brusgard
145	compliancereview@igt.com	Carrie	Porterfield
146	andy@westmeyerdental.com	Andrew	Westmeyer
147	mdorf@paypal.com	Matt	Dorf
148	christine.l.flohr@pwc.com	Christine	Flohr
149	kstein@ulmer.com	Kim	Stein
150	Andromeda.Morrison@casinocontrol.ohio.gov	Andromeda	Morrison
151	Kristen.Hannaford@53.com	Kristen	Hannaford
152	chris.winslow@opusnext.com	Chris	Winslow
153	tara.charnes@hofvillage.com	Tara	Charnes
154	Clay.Gordon@10tv.com	Clay	Gordon
155	truwest727@yahoo.com	trudy	west
156	amychristie@commonwealth-gaming.com	Amy	Christie
157	schlouch@rushstreetinteractive.com	Zachary	Schlouch
158	hmacmurray@msslawgroup.com	Helen	Mac Murray
159	debra.jobes@regology.com	Debra	Jobes
160	maile.keliikoa@betfred.com	Maile	Keliikoa
161	elma.hallberg@trustly.com	Elma	Hallberg
162	nstnstapleton@caesars.com	Neil	Stapleton
163	brianhoylive@gmail.com	brian	Hoy
164	daniel.rainieri@betmgm.com	Dan	Rainieri
165	samhuddleston@cbpohio.org	Sam	Huddleston
166	densinger@gongwer-oh.com	Dustin	Ensinger
167	sdalsheim@ifrahlaw.com	Sara	Dalsheim
168	berena.seifert@casinocontrol.ohio.gov	BERENA	SEIFERT
169	pdurbak@ohiocatholicfcu.com	Paul	Durbak
170	eweiss@oddscompliance.com	Eric	Weiss
171	jessica.franks@casinocontrol.ohio.gov	Jessica	Franks
172	edward.dusenberry@tax.state.oh.us	Eddie	Dusenberry

	A	B	C
173	cory.simmons@pngaming.com	Cory	Simmons
174	johntortora20@gmail.com	John	Tortora
175	andrew.silver@twinspires.com	Andrew	Silver
176	rachel.hargreaves@bet365.com	Rach	Hargreaves
177	lmhuddleston@gmail.com	Lauren	Huddleston
178	jack.pugliese@fanduel.com	Jack	Pugliese
179	nikki.llorca@chivemediagroup.com	Nikki	Llorca
180	stephen.schrier@blankrome.com	stephen	schrier
181	dave@booment.com	Dave	Behr
182	srustica@gmail.com	SHEILA	ABAD
183	brianne@consultbds.com	Brianne	Doura-Schawohl
184	thefoundrysalem@gmail.com	Bridget	Rose
185	Jennifer.Shaffer@casinocontrol.ohio.gov	Jenn	Shaffer
186	PressReleases@casinocitytimes.com	Jarrod	LeBlanc
187	thaines@dailystandard.com	Tom	Haines
188	brownr2020@outlook.com	Ronald	Brown
189	handzo@rushstreetinteractive.com	Todd	Handzo
190	bpvinc@gmail.com	Robert	Elser
191	joe32077@gmail.com	Joseph	Lombardo
192	sjohnson@christiansoncompanies.com	Steve	Johnson
193	matthew.barrack@betmgm.com	Matthew	Barrack
194	thehoop@hotmail.com	Robert	Kortsen
195	ironrick@gmail.com	Rick	Jansen
196	cpresjak@aol.com	Carol	Young
197	bpreston@lnw.com	Blaine	Preston
198	chuck@theblasdelgroup.com	Charles	Blasdel
199	jjarmbru@ameritech.net	Jeff	Armbruster
200	gregory.goldberg@circasports.com	Greg	Goldberg
201	cpohl@mgmresorts.com	Chandler	Pohl
202	denise.amick@pngaming.com	Denise	Amick
203	n-funderburg@mffg.net	Nathaniel	Funderburg
204	john@corridordc.com	John	Pappas
205	jess.stewart304@gmail.com	Jess	Stewart
206	akhil.ghirnikar@betmgm.com	Akhil	Ghirnikar
207	tbaugh@cleguardians.com	Ted	Baugh
208	deanna.pettit515@gmail.com	deanna	Pettit
209	cclc@roadrunner.com	Carl	Kochendorfer
210	stmelectricllc@gmail.com	steve	Minnielli
211	Nicolas.Soto@fanduel.com	Nicolas	Soto
212	fdg.oh.compliance@fanduel.com	FanDuel Regula	FanDuel Regulator
213	Tess.Dusenberry@tax.state.oh.us	Tess	Dusenberry
214	james@tappp.com	James	McCurdy
215	khall@theadvocate.com	Kevin	Hall

	A	B	C
216	shahrp@gmail.com	Raj	Shah
217	matthewmcauliffe@kpmg.com	Matthew	McAuliffe
218	joseph.volpi@lottery.ohio.gov	Joseph	Volpi
219	hanni@nourallighting.com	Hanni	Mahmood
220	vaguerrieri@gmail.com	Vince	Guerrieri
221	andrewashby@jackentertainment.com	Andy	Ashby
222	milan.karna@mha.ohio.gov	Milan	Karna
223	fsantoiemmo@teamweston.com	Frank	Santoiemmo
224	julien.philippart@gaming1.com	Julien	Philippart
225	sbrody@fubo.tv	Steven	Brody
226	ric@governmentedge.com	Ric	Baird
227	skoch@draftkings.com	Sarah	Koch
228	gzochodne@covers.com	Geoff	Zochodne
229	tarunksh@yahoo.com	Tarun	Kumar
230	magictreerudy@gmail.com	John	Rudy
231	tim.kelley@pngaming.com	Tim	Kelley
232	heather@heatherscoffeeandcafe.com	Heather	Sukola
233	jbalmert@enquirer.com	Jessie	Balmert
234	omar.fakhouri1@gmail.com	Omar	Fakhouri
235	mshuck@corpmg.net	Mark	Shuck
236	danielsj@caesars.com	Jana	Daniels
237	spencer@governmentedge.com	Spencer	Waugh
238	stacey.frohnafel@mha.ohio.gov	Stacey	Frohnafel-Hassco
239	mstarr@superbook.com	Mark	Starr
240	mobrien@cavs.com	Matt	OBrien
241	atlantafan08@outlook.com	Gary	Cotton
242	Kimberly@bluelaserdigital.com	Kimberly	Ness
243	smleopold@duanemorris.com	Scott	leopold
244	zach.farber@underdogfantasy.com	Zach	Farber
245	cbliss@det.mgmgrand.com	CINDY	BLISS
246	corey.roepken@catenamedia.com	Corey	Roepken
247	derek.helling@catenamedia.com	Derek	Helling
248	mholt@usintegrity.com	Matthew	Holt
249	jgrad@henselgrad.com	Joseph	Grad
250	tara.jones@intralot.us	Tara	Jones
251	bwilmers@jdscompanies.com	Brian	Wilmers
252	mdavis@thesuccessgroup.com	McKenzie	Davis
253	julio@sports-betting-consultants.com	Julio	Soriagalvarro
254	gaungst@brunswick.oh.us	Grant	Aungst
255	lizzmatheson@gmail.com	ELIZABETH	MATHESON
256	daddleman@mgmresorts.com	Dave	Addleman
257	perryriddickii@gmail.com	Perry	Riddick
258	to'quinn-sims@mcadamhs.org	Taniayah	O'Quinn-Sims

	A	B	C
259	dana.reising@toledo.oh.gov	Dana	Reising
260	mforney@deleoneassociates.com	Matthew	Forney
261	bfischer@orrick.com	Bradley	Fischer
262	rgmorg@att.net	RICHARD	MORGAN
263	mwest@boselaw.com	Max	West
264	MikeMc2017@gmail.com	Michael	McCormick
265	norrison@betparx.com	Nick	Orrison
266	dspoerl@bex.net	Daniel	spoerl
267	christian.peterson@sportshubtech.com	Christian	Peterson
268	elena.kvakova@internetvikings.com	Elena	Kvakova
269	jessica.bullock@unitedtote.com	Jessica	Bullock
270	tlloc3210@gmail.com	Tony	Cooper
271	Simeonia.Mays@lottery.ohio.gov	Simeonia	Mays
272	cblackham@msslawgroup.com	Walter	Blackham
273	sealerman1@adelphia.net	James	Frank
274	marita.navarro@bet365.com	Marita	Navarro
275	accounts@rmdportfolios.com	Rocky	Brennan
276	abakaletz@gmail.com	Alex	Bakaletz
277	ltheros@det.mgmgrand.com	Louis	Theros
278	aatanasovic@bettercollective.com	Aleksandar	Atanasovic
279	matthew.king@bet365.com	Matt	king
280	Zachary.silverberg@wellsfargo.com	Zachary	Silverberg
281	gm@marioncountryclub.com	Dale	Osborn
282	john.oberle@icemiller.com	John	Oberle
283	ross@subworxllc.com	Ross	Holden
284	gabeja80@gmail.com	Gabriel	Adams
285	will@acutus.llc	WILL	GREEN
286	matthew.bryant@openbet.com	Matthew	Bryant
287	scott.frost@lottery.ohio.gov	Scott	Frost
288	chatfield60@gmail.com	Chris	Hatfield
289	wjb316@gmail.com	Wes	Burns
290	jborkly@gmail.com	John	Borkly
291	Gregory.Brooks@pngaming.com	Gregory	Brooks
292	d.cash@sportradar.com	Dawn	Cash
293	Steven.Schult@catenamedia.com	Steve	Schult
294	lou.monaco@gdcgroup.com	Lou	Monaco
295	andy.kostival@sundaycreekhorizons.com	Andy	Kostival
296	hwafer@superbook.com	Hal	Wafer
297	dandodd@zhfconsulting.com	Dan	Dodd
298	martin@coollaw.com	Patrick	Martin
299	dittoe@highbridgeco.com	Mike	Dittoe
300	steven.heckenluber@pngaming.com	Steven	Heckenluber
301	dave.morgan.oh@pm.me	David	Morgan

	A	B	C
302	snadeau@sightlinepayments.com	Shannon	Nadeau
303	ken.litwak.2@gmail.com	Ken	Litwak
304	jessica.gianduso@betmgm.com	Jessica	Gianduso
305	jgleason@gleasonlawofficellc.com	John	Gleason
306	nickw1825@gmail.com	Nicholas	Wood
307	mathew.jackson@bassettsmarket.com	Mathew	Jackson
308	kjk1084@gmail.com	Kevin	Kale
309	Twochicksandapie@gmail.com	Stephanie	Minor
310	dheyman@zhftaxlaw.com	Derek	Heyman
311	jonathan.brook@kambi.com	Jonathan	Brook
312	jess.panora@betmgm.com	Jess	Panora
313	michael.levine@betfanatics.com	Michael	Levine
314	josh.mehta@fanduel.com	Josh	Mehta
315	aliffconnie@gmail.com	Connie	Aliff
316	matthew.ashton@pointsbet.com	Matthew	Ashton
317	mkoppitch@bricker.com	Matt	Koppitch
318	danielle.boyd@hardrockdigital.com	Danielle	Boyd
319	kacincione@vorysadvisors.com	Karen	Cincione
320	vguveiyian@gan.com	Vicki Lynn	Guveiyian
321	david.bretnitz@kambi.com	David	Bretnitz
322	daniel.mulhall@betfanatics.com	Daniel	Mulhall
323	hr@casinocontrol.ohio.gov	Judith	Schember
324	kate.machard@derivco.co.za	Kate	Machard
325	david@lowcountryeditorial.com	David	Caraviello
326	trever.wright@uc.edu	Trever	Wright
327	afleischer@google.com	Andrew	Fleischer
328	gary@usbets.com	gary	rotstein
329	angela.mcnair@tax.state.oh.us	Angela	McNair
330	Georgina.Finch@bet365.com	Georgina	Fnch
331	philip.burring@marownholdings.com	Philip	Burring
332	ldlevenson@cooperlevenson.com	Lloyd	Levenson
333	marisalutz@att.net	Marisa	Lutz
334	ahavas@thevsl.com	Andrew	Havas
335	legal@darkside.media	Effraim	Nauri
336	Bryangladden@icloud.com	Bryan	Gladden
337	neil.walsh@hardrockdigital.com	neil	walsh
338	ecompton@kmklaw.com	Emma	Compton
339	esechrist@orrick.com	Erica	Sechrist
340	jft@ibia.bet	Jason	Foley-Train
341	ted.nussman@cincinnati-oh.gov	Ted	Nussman
342	bstrickland@sis.tv	Brenda	Strickland
343	llewellyn@rushstreetinteractive.com	Jim	Llewellyn
344	editorduren@gmail.com	J.R.	Duren

	A	B	C
345	Cristiane.Fernandes@bhnetwork.com	Cristiane	Fernandes
346	thensley0422@gmail.com	Tim	Hensley
347	alogiudice@saiber.com	Ariana	LoGiudice
348	pcost@brookspierce.com	Pearson	Cost
349	jamie@dyveagency.com	Jamie	Salsburg
350	agarrett@thebeaconjournal.com	Amanda	Garrett
351	keesha.foster@casinocontrol.ohio.gov	Keesha	Foster
352	robert.tablack@gmail.com	Robert	Tablack
353	robert.linnehan@xlmedia.com	Robert	Linnehan
354	Chinh.Nguyen@hrcincinnati.com	Chinh	Nguyen
355	justin@compliant.com	Justin	Stempeck
356	JKEDROWSKI@MGMRRESORTS.COM	James	Kedrowski
357	kcochran@draftkings.com	Kevin	Cochran
358	cmerritt@oab.org	Christine	Merritt
359	heather.sharpe@pngaming.com	Heather	Sharpe
360	jennifer.roberts@wynnbet.com	Jennifer	Roberts
361	daveallen84@yahoo.com	David	Allen
362	plovins@bluejackets.com	Peter	Lovins
363	kosich@wews.com	John	Kosich
364	ttywang@haslamsports.com	Ted	Tywang
365	michelle.buckler@hrcincinnati.com	Michelle	Buckler
366	csieroty@vixio.com	Chris	Sieroty
367	xfmtra92@gmail.com	Frank	
368	scott.basom@lottery.ohio.gov	Scott	Basom
369	deldredge@hannah.com	Danny	Eldredge
370	jeremy@fansunite.com	Jeremy	Hutchings
371	adam@govsolgrp.com	Adam	hewit
372	danny.dirienzo@geocomply.com	Danny	DiRienzo
373	melissa.blau@gmail.com	Melissa	Blau
374	marcedelman@aol.com	Marc	Edelman
375	johnw@ufpm.net	John	Winters
376	matthew.spitnale@pngaming.com	matt	spitnale
377	backyardbar1@aol.com	Cheryl	Cunningham
378	daurean.sloan@circalasegas.com	Daurean	Sloan
379	gary@casinocity.com	Gary	Trask
380	jphsr12@gmail.com	james	Hicks
381	cakelleher@michaelbest.com	Chelsea	Kelleher
382	avandusen@taftlaw.com	Alexandra	Van Dusen
383	sward@orrick.com	Scott	Ward
384	jehrenfeld@blueocean.com	Jonathan	Ehrenfeld
385	dkrisch@foxrothschild.com	Daniel	Krisch
386	morgantina16@gmail.com	tina	morgan
387	charles.lopresti@lottery.ohio.gov	Charles	LoPresti

	A	B	C
388	sheehan@origobrading.com	Sheehan	Hannan
389	johnmackewich@mackewich.com	John	Mackewich
390	parrym@ballardspahr.com	Maren	Parry
391	tuckerstavern@comcast.net	Scott	Bornyk
392	aj@mattkallner.com	Abe	Jacob
393	bdavis@shafferentertainment.com	Robert	Davis
394	m-rogers.3@onu.edu	Michael	Rogers
395	rmclaughlin@woh.com	Robert	McLaughlin
396	rob_armstrong@bennett-enterprises.com	Rob	Armstrong
397	MFEISZLI@BDO.COM	Michael	Feiszli
398	steve@odmbbq.com	Steve	
399	eric.skalski@betfred.com	Eric	Skalski
400	jake.williams@pointsbet.com	Jake	Williams
401	zack.carreon@cinradio.org	Zack	Carreon
402	sphagan@velawoodlaw.com	Shena	Phagan
403	jposey@scpublichealth.com	Jim	Posey
404	fnunez@caesars.com	Frank	Nunez
405	acrisovan@det.mgmgrand.com	Abby	Crisovan
406	charles.dwaileebe@livech.com	Charlie	Dwaileebe
407	mcbills1955@gmail.com	Rahul	Patel
408	bw3corp@gmail.com	Edward	Yaskowitz
409	bill.sattler@hardrockdigital.com	william	sattler
410	mtkeilholz@hotmail.com	Mike	Keilholz
411	Elizabeth.Schorr@jfs.ohio.gov	Elizabeth	Schorr
412	douglasdaydeedee@gmail.com	Deidre	Douglas
413	alissa.naylor@betmgm.com	Alissa	Naylor
414	gregory.stewart58@gmail.com	Gregory	Stewart
415	maxwell.smith@cincinnati-oh.gov	Maxwell	Smith
416	frederik@beuk.biz	Frederik	Beuk
417	michael.maglietta@fanduel.com	Michael	Maglietta
418	heath@parlaycolumbus.com	Heath	Pontious
419	caty.abbott@casinocontrol.ohio.gov	Caty	Abbott
420	bwillard@gbq.com	Benjamin	Willard
421	emma.olsson@kambi.com	Emma	Olsson
422	charlie.horner@sbcgaming.com	Charlie	Horner
423	michiko.nozawa-joffe@twinspires.com	Michiko	Nozawa-Joffe
424	justin.black@gamesys.com	Justin	Black
425	grace.moat@betmgm.com	GRACE	Moat
426	michelle@ifrahlaw.com	Michelle	Cohen
427	carla.reeves@lottery.ohio.gov	CARLA	REEVES
428	npervaiz@recres.org	Nabil	Pervaiz
429	mhemmerle@shift4.com	Mark	Hemmerle
430	jscott@mgmnorthfieldpark.com	Jillian	Scott

	A	B	C
431	andrewwinchell@gmail.com	Andrew	Winchell
432	Aleah.Page@casinocontrol.ohio.gov	Aleah	Page
433	bob.moncrief@bet365.com	Robert	Moncrief
434	ashalasmith@yahoo.com	Ashala	Smith
435	dhestermann@caesars.com	Dean	Hestermann
436	Shawn.Drummond@pngaming.com	Shawn	Drummond
437	chelsea.andorka@lottery.ohio.gov	Chelsea	Andorka
438	cdesarro@hotmail.com	chris	desarro
439	inboundcontent@regology.com	Debra	Jobes
440	Kevin@CapCityStratCom.com	Kevin	Hall
441	tykuntzypr@gmail.com	Tyler	Kuntz
442	nathan@neaconsultingohio.com	Nathan	Aichele
443	sportsmediaexchange@gmail.com	Jill	Dorson
444	tspickerman@caesars.com	Tina	Spickerman
445	westonamiller@gmail.com	Weston	Miller
446	amonk@kplaw.com	Aaron	Monk
447	randybeals@gmail.com	Randall	Beals
448	hgensler@voicenet.com	Howard	Gensler
449	mway@graydon.law	Matthew	Way
450	sharkz23@aol.com	Laura	Scullin
451	s.may@gaminglabs.com	Steve	May
452	quentin.turner@tax.state.oh.us	Quentin	Turner
453	esuever@ballys.com	Elizabeth	Suever
454	matthew.king@pointsbet.com	Matthew	King
455	rodney@cooksmithcpas.com	Rodney	Cook
456	craig.robinson@mvgrrllc.com	Craig	Robinson
457	toddkleisinger@icloud.com	Todd	Kleisinger
458	nathan.dodd@bet365.com	Nathan	Dodd
459	terayperry@icloud.com	Teray	Perry
460	asitia.richardson@tax.state.oh.us	Asitia	Richardson
461	muething@fccincinnati.com	Paula	Boggs Muething
462	rockets2mars@gmail.com	Michael	Breen
463	swright@aimmediamidwest.com	Steven	Wright
464	rmancino@ohha.com	Renee	Mancino
465	cacooper216@yahoo.com	Carolyn	Cooper
466	denisekalis@roadrunner.com	Denise	kaliszewski
467	Deputydog9810@yahoo.com	Dennis	Schaefer
468	bradsmith00@icloud.com	Brad	Smith
469	k.dawson@gamingintelligence.com	Kio	Dawson
470	W.Curtis@draftkings.com	Bill	Curtis
471	cspada@pgnohio.org	Claire	Spada
472	spencer.hayes@betfred.com	Spencer	Hayes
473	Pat.McLoone@gdcgroup.com	Pat	McLoone

	A	B	C
474	mcarey@vixio.com	Matt	Carey
475	hangovers1@aol.com	JOSEPH	SLAGLE
476	nicholas.ciofani@lottery.ohio.gov	Nicholas	Ciofani
477	eric@edfcompliance.com	Eric	Frank
478	steven.berk@gianteagle.com	Steven	Berk
479	Natalie.Malloy@unitedtote.com	Natalie	Malloy
480	smcdonnell@cleveland.com	Sean	McDonnell
481	geha@marshall-melhorn.com	Henry	Geha
482	jmiddleton@williamhill.us	Jill	Middleton
483	danreinhard@jackentertainment.com	Daniel	Reinhard
484	ryan.hemingsen@betfred.com	Ryan	Hemingsen
485	symone.nelson@betfanatics.com	Symone	Nelson
486	kittys14sport@gmail.com	Billy	Watson
487	jhochman@covers.com	Jared	Hochman
488	jennifer.mcfarland@tax.state.oh.us	Jennifer	McFarland
489	Matthew.Kredell@catenamedia.com	Matthew	Kredell
490	jenny.mclauchlan@sccgmanagement.com	Jenny	McLauchlan
491	k.roche@draftkings.com	Krista	Roche
492	buzzcapital614@gmail.com	Ryan	Fyffe
493	jonathan@ascendantcollection.com	Jonathan	Petrea
494	bigpoppatf@yahoo.com	Antoine	Francis
495	toconnell@reds.com	Tim	OConnell
496	rlimardo@mgmresorts.com	Rick	Limardo
497	f.marina@elysgame.com	Flavio	Marina
498	dbattocletti@governmentadvocates.com	David	Battocletti
499	awkatz@amazon.com	Andy	Katz
500	kastevens@foxrothschild.com	Kerry	Stevens
501	JKLEIMAN@SAIBER.COM	Jeremy	Kleiman
502	kelly.gregor@tax.state.oh.us	Kelly	Gregor
503	raj@wright.bet	Raj	Shah
504	t.key@elysgame.com	Tory	Key
505	hanes@jbhco.com	Jillian	Hanes
506	mcurtin2323@yahoo.com	Michael	Curtin
507	MEW@rhcholdings.com	Melissa	Wideman
508	Derek.Smith@BMM.com	Derek	Smith
509	danielle.frizzi-babb@lottery.ohio.gov	Danielle	Frizzi-Babb
510	cody.fitch@tax.state.oh.us	Cody	Fitch
511	gabrielle@geocomply.com	Gabrielle	Angle
512	southgatechiroky@fuse.net	Roger	Jones
513	cbaily@thedailyreporteronline.com	Chris	Bailey
514	andrew.winchell@betr.app	Andrew	Winchell
515	jdeleone@deleoneassociates.com	Jeff	DeLeone
516	jsyphax@preventionactionalliance.org	James	Syphax

	A	B	C
517	todonnell@dickinsonwright.com	Terrence	ODonnell
518	jlimun@mgmresorts.com	Jeremy	Limun
519	nstapleton@caesars.com	Neil	S
520	gregoryledet@gmail.com	Gregory	Ledet
521	pcross@brookspierce.com	Patrick	Cross
522	jukeboxcle@gmail.com	Alex	Budin
523	hundlecj@gmail.com	Cody	Hundley
524	philip.burring@derivco.co.za	Philip	Burring
525	mshepro@haslamsports.com	Mary	Shepro
526	jlang@calfee.com	James	Lang
527	dpollock@tegna.com	Diana	Pollock
528	cgerhardt@govstrategies.com	Chip	Gerhardt
529	jared.goffinet@fox19now.com	Jared	Goffinet
530	complianceus@pointsbet.com	Compliance	Department
531	david.danzis@catenamedia.com	David	Danzis
532	roger.bryant@mvgrllc.com	roger	bryant
533	cmiller@foxrothschild.com	claudette	miller
534	jkilsby@vixio.com	James	Kilsby
535	Steve.Kastner@igt.com	Steve	Kastner
536	cory.brown@casinocontrol.ohio.gov	Cory	Brown
537	JohnAckworth@aol.com	John	Ackworth
538	jeremywfitzgerald@gmail.com	Jeremy	Fitzgerald
539	etully@aicuo.edu	Emily	Tully
540	tccampresort@gmail.com	Kimberly	Vizineau
541	brooke.murphy@kroger.com	Brooke	Murphy
542	amanda.holi@tipico.us	Amanda	Holi
543	dennis.fitzgerald@fiserv.com	Dennis	Fitzgerald
544	adenton@robbinsfirm.com	Alexander	Denton
545	hoosier3232@gmail.com	donald	emmons
546	mwagoner@shumaker.com	Mark	Wagoner
547	ryan@mckinleystategies.com	Ryan	Stenger
548	michealgarrett@outlook.com	Micheal	Garrett
549	david@gslawohio.com	david	jansky
550	chudsinc@gmail.com	Pete	Chudzinski
551	allysonmiller@jackentertainment.com	Allyson	Miller
552	tim@rtsports.com	TIMOTHY	JENSEN
553	clovett@mgmnorthfieldpark.com	Cash	Lovett
554	Bruce.Band@massgaming.gov	Bruce	Band
555	kyledavis1122@gmail.com	Kyle	Davis
556	kwentz@mgmnorthfieldpark.com	Kyle	Wentz
557	nick@zwillgen.com	Nicholas	Jackson
558	thayes@williamhill.us	Trevor	Hayes
559	ohiosportsbookleague@gmail.com	Randall	Beals

	A	B	C
560	jbierer@prevention-first.org	Jennifer	Bierer
561	Catherine.DeRose@tax.state.oh.us	Catherine	DeRose
562	msinnott@vsin.com	Mike	Sinnott
563	lfalgout@sapphirerisk.com	Leo	Falgout
564	clm314@aol.com	Cheryl	McArthur
565	alan@heitnerlegal.com	Alan	Wilmot
566	cdanburg@cleguardians.com	Curtis	Danburg
567	Alan.Moore@tax.state.oh.us	Alan	Moore
568	daniel@chalklinesports.com	Daniel	Kustelski
569	dpc@pacainc.com	David	Corey
570	logan@lindsell.org	Logan	Lindsell
571	tnc200394@yahoo.com	Thomas	Chetsko
572	jschmitz@gameaccount.com	Julie	Schmitz
573	agray@saiber.com	Amanda	Gray
574	patrick.tarnay@betmgm.com	patrick	tarnay
575	b.cipolla@draftkings.com	Bryan	Cipolla
576	t.smith@sportradar.com	Tracy	Smith
577	steve.bittenbender@gdcgroup.com	Steve	Bittenbender
578	tom@tompappas.com	Thomas	Pappas
579	kelsey.bitwinski@igt.com	Kelsey	Bitwinski
580	christopher.boan@gdcgroup.com	Christopher	Boan
581	Emily.Berner@casinocontrol.ohio.gov	Emily	Berner
582	atonoli@bizjournals.com	Amanda	Tonoli
583	msenn@Superbook.com	Meagen	Senn
584	daniel.monk@wcpo.com	Dan	Monk
585	porter@michgovstrategy.com	Aaron	Porter
586	babbott45@hotmail.com	Brett	Abbott
587	VLFerrise@bmdllc.com	Victoria	Ferrise
588	brendan@sharprank.com	Brendan	Logan
589	amber@sleeper.app	Amber	Dastrup
590	sara.tait@icemiller.com	Sara	Tait
591	jarrod@casinocity.com	Jarrod	LeBlanc
592	ljs@wowway.com	Lawrence	Scullin
593	jwheeler@ifrahlaw.com	Jackson	Wheeler
594	Jason@McKinleyStrategies.com	Jason	Paduchik
595	Susan.Christie@igt.com	Susan	Christie
596	brian.pratt@tipico.us	Brian	Pratt
597	andrew.steffen@massgaming.gov	Andrew	Steffen
598	mcheek@yahoosports.com	Meredith	Yu
599	megan.scharf@tipico.us	Megan	Scharf
600	lschirm@idology.com	Laurie	Schirm
601	afarrell@sbgvtv.com	Anita	Farrell
602	kevinjthobe@gmail.com	Kevin	Thobe

	A	B	C
603	ccampisi@bw.edu	Charles	Campisi
604	megan.otieno@betfanatics.com	Megan	Otieno
605	mattslovin@gmail.com	Matt	Slovin
606	milliganspub@gmail.com	Gordon	Milligan
607	Reshenbaugh@capitoladvocates.net	Rob	Eshenbaugh
608	jaultman@beaurivage.com	Jeremy	Aultman
609	madison@chwadvisors.com	Madison	Whalen
610	Brenda.McDonald@tax.state.oh.us	Brenda	McDonald
611	ben.roth@fanduel.com	Ben	Roth
612	dtj513@yahoo.com	Dan	Martinez
613	kathleen.lenhardt@pngaming.com	Kathleen	Lenhardt
614	amc@stateside.com	Amy	Cole
615	abrowning@recres.org	August	Browning
616	lynn.handler@catenamedia.com	Lynn Marie	Handler
617	mkosman@cleguardians.com	Maxwell	Kosman
618	abartlett@boselaw.com	Alexandra	Bartlett
619	vichip@gpgrhr.com	Victor	Hipsley
620	mseely@bettercollective.com	Mike	Seely
621	williamallsup1@gmail.com	William	Allsup
622	brich300@sbcglobal.net	Brian	Rich
623	ssanders@gpgrhr.com	Sydney	Sanders
624	christian.martino@betmgm.com	Christian	Martino
625	lindsay@geocomply.com	Lindsay	Slader
626	akremer@taftlaw.com	Anne	Kremer
627	laura.stanley@tax.state.oh.us	Laura	Stanley
628	paul.stein@kambi.com	Paul	Stein
629	jyarnell@hahnlaw.com	Justin	Yarnell
630	eric.ramsey@catenamedia.com	Eric	Ramsey
631	tristicah@simplebet.io	Tristica	Howard
632	mthevenot@bhfs.com	Melissa	Thevenot
633	brandon.henriksen@thescore.com	Brandon	Henriksen
634	tsr@mccarthylebit.com	Tyler	Renners
635	megan.ash-koeber@betmgm.com	Megan	Ash-Koeber
636	shawnstoledo@yahoo.com	Mike	Shroyer
637	director@hopeinfostoria.com	Shelly	Biggert
638	contact@usintegrity.com	Cheyne	Redenius
639	nlarson@recres.org	Nora	Larson
640	sstoppel@novomatic.com	Sabine	Stoppel
641	alapetina@vixio.com	Allegra	Lapetina
642	shensel@henselgrad.com	Susan	Hensel
643	jdelfosse@yourpremierbank.com	Jen	Delfosse
644	rfourke@gmail.com	Robert	Rourke
645	amademan78@gmail.com	Justin	Maucione

	A	B	C
646	alexolinger1986@gmail.com	alex	olinger
647	seahawk1258@yahoo.com	Ricky	Crum
648	Trobinson@gan.com	Tina	Robinson
649	sean@spdunn.com	Sean	Dunn
650	JBENEDICT@GOVSTRATEGIES.COM	JIM	BENEDICT
651	muhammad.khan@bet365.com	Muhammad	Khan
652	cheryl.rega@playtech.com	Cheryl	Rega
653	legal.us@bettercollective.com	Kyra	Pulliam
654	lauren.lemmer@betfanatics.com	Lauren	Lemmer
655	charliep@fb.com	Charlie	Patterson
656	jlist@draftkings.com	Jacob	List
657	robert.swedinovich@pngaming.com	Robert	Swedinovich
658	fbarroga@caesars.com	Floyd	Barroga
659	bspringhetti@wyncroftstrategies.com	Blake	Springhetti
660	cdparagas@gmail.com	David	Paragas
661	laura.burd@888holdings.com	Laura	Burd
662	dlongmeier@pgnohio.org	Derek	Longmeier
663	marystone@google.com		
664	nadersmn@gmail.com	Nader	Nazemi
665	bobc@isisports.com	Bob	Cooper
666	Skip@LocalThyme.Pub	Skip	Walker
667	swisneski@nabancard.com	Stephanie	Wisneski
668	SXIA@CAVS.COM	Summer	Xia
669	monica.wilcoxen@casinocontrol.ohio.gov	Monica	Wilcoxen
670	charlesh.knight@gmail.com	Charles	Knight
671	schoolbusdriverbill@yahoo.com	Bill	Frank
672	jcalcamu@gmail.com	Jeff	Calcamuggio
673	rdove@attorneydove.com	ROBERT	DOVE
674	vilma.farrar@betfred.com	Vilma	Farrar
675	katherine.sayre@wsj.com	Katherine	Sayre
676	ayamson@ohiobar.org	Annie	Yamson
677	emily.mongelli@mcesc.org	Emily	Mongelli
678	tyler@jockmkt.com	Tyler	Carlin
679	matt@CHWadvisors.com	Matthew	Carle
680	james.gazzale@catenamedia.com	James	Gazzale
681	bsmith@taftlaw.com	Bianca	Smith
682	christine.m.bordeaux@gmail.com	Christine	Bordeaux
683	adam@angeltooth.com	Adam	Avery
684	elise@capitoledegeo.com	Elise	Geig
685	robert.wang@cantonrep.com	Robert	Wang
686	ruffingconsulting@gmail.com	Mike	Ruffing
687	lricksy@taftlaw.com	LeRoy	Ricksy
688	tablerjames476@gmail.com	James	Tabler

	A	B	C
689	management@didjos.com	Jake	Didion
690	tbowen@ohiorestaurant.org	Tod	Bowen
691	hboyden@draftkings.com	Heidi	Boyden
692	steven.johnson6@gmail.com	Steve	Johnson
693	steven_husk@yahoo.com	steven	Husk
694	ANDREA.SOUSA@BETMGM.COM	ANDREA	SOUSA
695	jennifer.thomas@butlersnow.com	Jennifer	Thomas
696	mike@ontapgrille.com	Michael	simms
697	matt.schoch@catenamedia.com	Matt	Schoch
698	zbirnbaum@vixio.com	Zachary	Birnbaum
699	nhock@brookspierce.com	Noah	Hock
700	mitchellmark2@gmail.com	Mark	Mitchell
701	reedcarlvonmehren@jackentertainment.com	Reed	von Mehren
702	nkay@fluentricciardi.com	Nicole	Kay
703	amoormann@pappaskc.com	Alex	Moormann
704	daniel.carter@lottery.ohio.gov	Dan	Carter
705	dylanwilkerson4@gmail.com	Dylan	Wilkerson
706	jrubin@cjrgroup.net	Josh	Rubin
707	stefensloane@gmail.com	Stefen	Sloane
708	adam@brewfontaine.com	Adam	Rammel
709	rgiden@ekgamingllc.com	Rebecca	Giden
710	peter.wolff@bet365.com	Peter	Wolff
711	nathan.shaver@tn.gov	Nathan	Shaver
712	communications@casinocontrol.ohio.gov	Jessica	Franks
713	matthew.clever@lottery.ohio.gov	Matthew	Clever
714	mspitna@gmail.com	matt	spitnale
715	alicia.hughes@catenamedia.com	Alicia	Hughes
716	jennifer.whitehurst@huntington.com	Jen	Whitehurst
717	npeinado@gan.com	Noemi	Peinado
718	todd-tracy@sbcglobal.net	Todd	Tracy
719	tinaburbacher@outlook.com	Christina	Burbacher
720	coakes@mcadamhs.org	Colleen	Oakes
721	ekirk@draftkings.com	Erika	Kirk
722	brylin.abrahams@digitalgamingcorp.com	Brylin	Abrahams
723	cbennett@cjlawpolicy.com	Claire	Bennett
724	jake.garza@catenamedia.com	Jake	Garza
725	gfinan@draftkings.com	Griffin	Finan
726	d.daniels@gaminglabs.com	Dave	Daniels
727	rachel.kasper@pointsbet.com	Rachel	Kasper
728	gary.dewitt@mvgrrllc.com	Gary	DeWitt
729	jz@theoddsfactory.com	James	Zalcman
730	kcopp@taftlaw.com	Kimberly	Copp
731	cjfisher@foxrothschild.com	CJ	Fisher

	A	B	C
732	emma.cowley@img.com	Emma	Cowley
733	mark.williams@tax.state.oh.us	Mark	Williams
734	pmartin@mgmresorts.com	Patrick	Martin
735	gregory.bailey@blankrome.com	Gregory	Bailey
736	matt.h@jjventures.com	Matthew	Hortenstine
737	derek.helling@playusa.com	Derek	Helling
738	aluckie@onecomply.com	Austin	Luckei
739	abibisi@walterhav.com	Alexander	Bibisi
740	seb.jedski@usintegrity.com	Sebastian	Jedrzejewski
741	nikul.patel@rushstreetinteractive.com	Nikul	Patel
742	daniel.pozniak@dstdadvisorsllc.com	Dan	Pozniak
743	robyn.bowers@betmgm.com	Robyn	Bowers
744	spencer@highbridgeco.com	Spencer	Gross
745	jterzotis@theadvocate.com	Judi	Terzotis
746	prevention@hopeinfoستoria.com	Ronele	Myers
747	aserrao-roman@bloombergindustry.com	Angelica	Serrano-Roman
748	l.pilling@gamingintelligence.com	Lorien	Pilling
749	kpamir@novomaticamericas.com	Kemal	Pamir
750	cmacmac@aol.com	Christopher	Macrides
751	eric.snider@lotterync.net	Eric	Snider
752	oburris@pgnohio.org	Olivia	Burris
753	Koneda.Jackson@tipico.us	Koneda	Jackson
754	lbriggs@fantiniresearch.com	Laura	Briggs
755	chubby24@att.net	William	Gass
756	trevor.mauck@bakermckenzie.com	Trevor	Mauck
757	Nathan.Wright@tax.state.oh.us	Nathan	Wright
758	brian.fried@fanduel.com	Brian	Fried
759	jallen@williamhill.us	james	Allen
760	erika.dinapoli@bmm.com	Erika	DiNapoli
761	loneill@mgmresorts.com	Lea	O'Neill
762	rgonsalves@gameaccount.com	Ren	Gonsalves
763	jessica.welman@sbcgaming.com	Jessica	Welman
764	shawn@nelsongovernmentstrategies.com	Shawn	Nelson
765	emily.wendel@lsc.ohio.gov	Emily	Wendel
766	jnugent@foxrothschild.com	Julie	Nugent
767	saba.asgedom@betmgm.com	Saba	Asgedom
768	prenick@fanatics.com	Patrick	Renick
769	samuel.porter@icemiller.com	Sam	Porter
770	kimberly.yuhl@catenamedia.com	Kimberly	Yuhl
771	bill@byersminton.com	Bill	Byers
772	rhennosy@buckeyelakebrewery.com	Rich	Hennosy
773	jennifer.jarrell@com.ohio.gov	Jennifer	Jarrell
774	flavio.marinai@fmetek.it	Flavio	Marinai

	A	B	C
775	candyce.knowles@betmgm.com	Candyce	Knowles
776	Eric.Lawrence@bet365.com	Eric	Lawrence
777	frankedavidson@gmail.com	Frank	Davidson
778	cscholvin@bluejackets.com	Cameron	Scholvin
779	fpakish1012@sbcglobal.net	Frank	Pakish
780	david.paragas@btlaw.com	David	Paragas
781	ian.robinson@pngaming.com	Ian	Robinson
782	platinumjayn@yahoo.com	Jay	Nelson
783	gflanagan@parxcasino.com	Grace	Flanagan
784	cquinn@cleveland.com	Chris	Quinn
785	fabiusm@ballardspahr.com	Michael	Fabius
786	mwilson@smithillner.com	Michael	Wilson
787	juliejanczewski@gmail.com	Julie	Janczewski
788	Kevin.Laguerre@BetMGM.com	Kevin	Laguerre
789	mjones@foxrothschild.com	Marie	Jones
790	kimberleyh@digitalgamingcorp.com	Kimberley	Sanchez

EXHIBIT C

HALL OF FAME RESORT & ENTERTAINMENT CO.

Tara K. Charnes, General Counsel
Email: tara.charnes@hofvillage.com

May 7, 2024

Matthew T. Schuler
Executive Director
Ohio Casino Control Commission
100 East Broad Street, 20th Floor
Columbus, OH 43215

Via email: rulecomments@casinocontrol.ohio.gov
matt.schuler@casinocontrol.ohio.gov

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

cc: Andromeda Morrison
General Counsel & Director of Skill Games
andromeda.morrison@casinocontrol.ohio.gov

Michael Crawford
President & Chief Executive Officer
michael.crawford@hofvillage.com

Eric Kohut
Senior Legal Counsel
eric.kohut@hofvillage.com

