

Stakeholder/Public Comment for JCAR Agency Report: *Internet Gaming*

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Name/Org	Comments Public Hearing/ Written	LSBA LIGA	Rule	Comment	Change/no change	Agency rationale
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.611(c)	Definition of "Affiliate marketer": Add to end of subrule: who have an agreement with an internet gaming operator to be compensated based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross receipts.	Change	Definition modified resulting in change to rule 432.622(3)(e) and 432.629(1)(a)(i)
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.611(c)	The current definition of "affiliate marketer" is very broad. Change to: "Affiliate marketer" means entities and individuals involved in promoting, marketing, and directing business to online gaming sites, on their own behalf, and who have an agreement to be compensated by a sports betting or internet gaming operator licensee based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross revenue."	Change	Definition modified resulting in change to rule 432.622(3)(e) and 432.629(1)(a)(i)
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.611(e)	Add bingo and keno to authorized games	No change	Board retains authority to authorize bingo and keno.
Lloyd D. Levenson (Cooper Levenson)	Written	LIGA	432.611(l)	Definition of "Internet gaming network": We are in favor of Rules being put in place that will allow multi-state poker	Change	Board changed to address authorized multijurisdictional internet gaming

				agreements should the legislature pass such a bill authorizing same.		
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.611(p) – (q)	Version 2 of Standard GLI-19 should be “version 3”	Change	As a result of the change from version 2 to version 3 (R 432.633(2), the definitions of “live game” and “live game environment” were added
MGCB	Written	LIGA	432.611(r)	Definition of “Peer-to-peer” gaming is not in alphabetical order	Change	Moved to alphabetical order
Seth Young, PointsBet	Written	LIGA	432.611(r)	Definition of “Peer-to-peer gaming”: Should clarify that the intention of this does not include exchange wagering (sports) as peer to peer gaming.	No change	No need to clarify, as exchange wagering is conducted under LSBA, not LIGA
Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.611(s)	Definition of “Prohibited person”: Employee participation/risk	Change	Removed (iv) and (vi); Definition changed to no longer prohibit person licensed under Gaming Control and Revenue Act or the Indian Gaming Regulatory Act from creating accounts or placing wagers.
Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.611(s)(vi)	Def. of “prohibited persons”: The Pokagon Band has concerns about the addition of the term “appointees” to the definition of “Prohibited person”. (1) What is an “appointee” of a tribal casino? (like most other commercial entities, tribal gaming enterprises don’t “appoint” people to	Change	Moved “appointees” to a new paragraph: 432.611(s)(v). Including appointees with tribal gaming commission is consistent.

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				positions, they hire them as employees); (2) what regulatory purpose is intended to be served by extending the prohibition to “appointees”?; (3) why shouldn’t the prohibition be applied also to state-licensed casinos?		
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.611(u)	Version 2 of Standard GLI-19 should be “version 3”	Change	As a result of the change from version 2 to version 3 (R 432.633(2), the definition of “random number generator” was updated
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.611(w)	Version 2 of Standard GLI-19 should be “version 3”	Change	As a result of the change from version 2 to version 3 (R 432.633(2), the definition of “remote player device” was added and “remote/proxy player games deleted
Seth Young, PointsBet	Written	LIGA	432.611(cc)	Definition of “Targeted mailing”: Would this prohibit cross-selling customers from a sports betting platform to a casino?	No change	R 432.674 prohibits targeted mailing to persons on the self-exclusion list
Andrea Hansen on behalf of FanDuel	Written	LSBA	432.611	Add definition of ex parte communication	No change	Limits Board discretion
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.621a	Proposed adding “operator” along with “platform provider”	No change	Covered in R 432.721
Seth Young, PointsBet	Written	LIGA	432.621a	Requesting the Board rely on reporting requirements outside of those reported by the US Securities and Exchange Commission	No change	The Board relies on reporting to the US Securities and Exchange Commission
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.621f(2) - (3)	Suggests language is duplicative of other subrules	No change	Unnecessary

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Bill Brooks on behalf of Quinto Singleton on behalf of Nottawaseppi (NHBP)	Written	LIGA	432.621k(2)	Not all vendors will have an actual representative in Michigan to receive services and other persons required to be licensed likely will have no presence in the state	Change	Removed “within Michigan.”
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.622(2)	Requesting clarification	No change	Contrary to the definition of supplier MCL 432.403(ee)
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.622(3)(e)	Definition of “Affiliate marketer”: Add to end of subrule: who have an agreement with an internet gaming operator to be compensated based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross receipts.	Change	Definition modified resulting in change to rule 432.622(3)(e) and 432.629(1)(a)(i)
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.623(1)	Subpart (1) could be overly burdensome	No change	There is a mechanism in place for a sports betting operator or sports betting supplier to provide an explanation, such as a job description, to support an allegation that a position should not require an occupational license. Board identified persons having direct impact on integrity of gaming.
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.623(2)	Encompassing too large group of employees; add “deployment of code to production of”	Change	Board identified persons having direct impact on integrity of gaming

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Robert Russel, RMC, on behalf of DraftKings	Written	LIGA	432.623(2)	Suggest including "deployment of code" language to limit who is included in occupational licensing.	Change	Board identified persons having direct impact on integrity of gaming
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.623(2)	Limit the scope of who is required to be licensed	Change	Board identified persons having direct impact on integrity of gaming
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.623(2)(a) and (b)	Limit scope of occupation licensing only to individuals that make changes to hardware or software having ability to affect the outcome of a game	Change	Board identified persons having direct impact on integrity of gaming
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.623(2)(a) and (b)	Encompassing too large group of employees; add "deployment of code to production of"	Change	Board identified persons having direct impact on integrity of gaming
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.623(2)(c)	Vague and unclear	Change	Removed 623(2)(c) and (d)
Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.623(11)(c)	Occ. Licensing: Reciprocity provision was removed, request it be added back in	Change	Board added language allowing exemption from occupational licensing if licensed by governmental entity. Can still require registration
Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.623(12)	Occ. Licensing: Reciprocity provision was removed, request it be added back in	Change	Board added language allowing exemption from occupational licensing if licensed by governmental entity. Can still require registration
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.624	Asking for clarification that employers are permitted to pay occupational licensing fees on behalf of their employees	No change	Operators or platform providers <i>can</i> pay occupational license fees

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Andrea Hansen on behalf of FanDuel	Written	LIGA	432.624(3)(c)	Proposed occupational license fees are higher than other jurisdictions	Change	Board lowered fee from \$500 to \$250
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.624(8)	Occupational license should be payable every two years concurrent with the renewal	Change	Changed to reflect payment biennially
Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.625b(3)	Supplier licensing: The contingent rule regarding whether a supplier qualifies as “an arm of the tribe” should only apply if the tribe who is in a relationship with the supplier claims that the supplier is an arm of the tribe. The determination of whether the supplier qualifies as an “arm of the tribe” should be based on objective criteria informed by proper analysis of federal Indian law. See, e.g., People v. Miami Nation Enterprises, 386 P.3d 357 (2016)	Change	Language was added to clarify that relevant legal criteria under federal Indian law will be used to establish arm of tribe status.
Seth Young, PointsBet	Written	LIGA	R 432.628c	confidentiality of commercial contracts	No change	Confidentiality will be dictated by LIGA and FOIA
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.629(1)(a)(i)	Definition of “Affiliate marketer”: Add to end of subrule: who have an agreement with an internet gaming operator to be compensated based on the number of registrations, the number of depositing registrations, or a percentage of adjusted gross receipts.	Change	Definition modified resulting in change to rule 432.622(3)(e) and 432.629(1)(a)(i)
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.629(1)(a)(iii)	Should “supplier” be changed to “platform provider”	Change	Platform provider is the correct term
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.629(1)(a)(iii)	Add “that directly affects internet sports betting”	No change	If the business “directly affects internet sports

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						betting,” it is likely a supplier, not a vendor
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.629(1)(a)(iii)	Change “in a” to “during the prior” calendar year	No change	The registration should be obtained when the vendor crosses the \$100,000 threshold.
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.629(1)(a)(iii)	Suggest deleting (1)(a)(iii) and limiting (1)(a)(v) to other persons who provide more than \$100,000 worth of goods and/or services in a calendar year that are specifically related to the operation of internet gaming as deemed necessary by the board.	No Change	If the goods and/or services are specifically related to sports betting, the person is likely to be a supplier not a vendor. Board needs authority to determine other persons that require vendor registration.
Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.629(1)(a)(iv)	“Data Warehouses” may not be the best term -- “Data Centers” seems more accurate.	Change	“Data Center” is a more appropriate term
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.631(1)	Insert language allowing for multi-jurisdictional internet gaming	Change	Board changed to address authorized multijurisdictional internet gaming
Lloyd D. Levenson (Cooper Levenson)	Written	LIGA	432.631(1)	We are in favor of Rules being put in place that will allow multi-state poker agreements should the legislature pass such a bill authorizing same.	Change	Board changed to address authorized multijurisdictional internet gaming
Robert Russel, Regulatory Management Counselors, (RMC) on behalf of Playtech	Written	LIGA	R 432.631(1)	For clarity purposes, what about non-wagering activities such as login, withdrawals and deposits? Can these permissibly occur from outside of the state?	Change	Board changed to address authorized multijurisdictional internet gaming
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.632a	Limit source code to those deemed to be a critical component	No change	Lab needs source code for any component, not just critical components
MGCB	Written	LIGA	432.632a(1)(j)(i)	Change “sports betting” to “gaming”	Change	Error correction

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Andrea Hansen on behalf of FanDuel	Written	LIGA	432.632a(2)	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.632a(6)	Submitting source code to any entity, even a third-party testing laboratory, could become a security breach to any operator or supplier’s platform and open up the platform to unnecessary risk. We respectfully suggest the following substitute language, “The internet gaming platform provider or internet gaming supplier shall verify the hashes of critical components.”	No change	Board needs source code to evaluate the submission and ensure the submitted software is what was approved
Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.632a(7)	Provide automatic approval for software updates to reduce unnecessary delays and increased regulatory costs.	No change	Handling of software updates is sufficiently addressed under the self-monitoring of gaming platform critical components and change approval requirements of the administrative rules.
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.633(2)	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3. Rules affected: 432.611, 432.632a, 432.633(2), 432.633a, 432.633b, 432.639(2)(c)(vi), R 432.639b, R 432.649
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.633a(1)(b)	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules

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						relying on prior version were changed to align with version 3
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.633a(3)	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.633a	Propose adding: “This Rule is not intended to prohibit an auto-spin feature on a slot game.”	No change	Board has authority to approve auto-spin feature
Robert Russel, RMC, on behalf of Playtech	Written	LIGA	432.633a	Request clarity on the term “induce”	No change	This will be assessed as part of platform submission assessed on a case-by-case basis
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.633a(3)	We respectfully request that the inclusion of “no auto play” being allowed without Board approval is targeted towards disallowing “bots” and is not meant to disallow the auto-spin feature seen on slot games. Every slot machine game developed for iGaming has auto-spins built in as a core feature.	No change	The Board has authority to approve auto play features
Seth Young, PointsBet	Written	LIGA	432.633b	What happens if the RTP (return to player) goes over 100%?	No change	RTP requirement applies to theoretical RTP, not actual RTP
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.633b	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3. Reduced from subrules (1)-(14) to subrules (1)-(4)

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Andrea Hansen on behalf of FanDuel	Written	LIGA	432.633c	Version 2 of Standard GLI-19 should be “version 3”	Change	432.633c was removed as a result of changes to GLI-19 version
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.633c(1)(a)	Seeking clarification that branded games are not disallowed	No change	Branded games are allowed This rule was deleted when GLI version was updated.
Lloyd D. Levenson, Cooper Levenson	Written	LIGA	432.634(1)	We are in favor of Rules being put in place that will allow multi-state poker agreements should the legislature pass such a bill authorizing same.	Change	Board changed to address authorized multijurisdictional internet gaming
Robert Russel, RMC, on behalf of Playtech	Written	LIGA	432.634(1)	Can progressive product servers and other network product servers that are not receiving wagers be located in other states?	No change	See Board’s technical bulletins
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.634(1)	Eliminate the requirement that servers be located in Michigan and can be located in other jurisdictions where the operator or platform provider operates internet gaming	Change	Added language to allow Board to approve location of servers out of state.
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.634(1)	Change “and” to “and/or”	No change	Board needs information on the location of all servers
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.635(4)	Change “and” to “or”	Change	Change “and” to “or, or both” More appropriate term
Robert Russel, RMC, on behalf of Playtech	Written	LIGA	432.636	Questions on report formats and types of data to be recorded	No change	See Board’s technical bulletins
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.636(3)	Change “and” to “or”	Change	Change “and” to “or, or both” More appropriate term
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.637a	Change “and” to “or”	No change	Must be done jointly

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Mike Phelan, Pokagon Gaming Authority	Written	LIGA	432.639	In order to avoid confusion and possible conflict, this provision should be coordinated with (or, possibly, combined with) 432.634(1), which addresses substantially the same subject matter.	No change	432.634(1) addresses wagering components only (which must be located in Michigan), while this provision addresses all critical components. Some components will be subject to both requirements, while certain non-wagering components will only be subject to this provision.
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639(1)	Change “and” to “or”	change	Change to “or both” More appropriate term
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639(2)(c)(vi)	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639(3)	Change “and” to “or”	Change	Change “and” to “or or both” More appropriate term
Robert Russel, RNC, on behalf of DraftKings	Written	LIGA	432.639b(1)	Remove that gaming environment used to conduct remote/proxy player or similar games must be located “in the state of Michigan”	Change	Added language to allow Board to approve locating the gaming environment out of state
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639b(2)	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639c(5)	Change “and” to “or”	Change	Change “and” to “o,r or both” More appropriate term

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Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639c(6)	Change “and” to “or” Change “and” to “or”	change	In both places, change “and” to “or, or both” More appropriate term
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639c(7)	Change “and” to “or”	change	change “and” to “or, or both” More appropriate term
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639c(8)	Change “and” to “or”	change	change “and” to “o,r or both” More appropriate term
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.639c(9)	Change “and” to “or”	change	change “and” to “o,r or both” add “provider”
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.639c	Seeking confirmation that Rule 432.639 allows for progressive jackpots to be shared between two internet gaming operators within the State of Michigan.	No change	it allows for progressive jackpots in general
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.639d	Seeking confirmation that Rule 432.639 allows for progressive jackpots to be shared between two internet gaming operators within the State of Michigan.	No change	it allows for progressive jackpots in general
Seth Young, PointsBet	Written	LIGA	432.639d(1)	Can an internet gaming operator link to a third-party poker room?	No change	An operator can pool with another operator in Michigan
Seth Young, PointsBet	Written	LIGA	432.641(6)	Request shift burden of complaint resolution from the operator to the patron	No change	Operator or platform provider is only required to notify the Board of an unresolved complaint; it is the participant’s responsibility to file an unresolved complaint with the Board
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.641(7)	Add “Any such decision by the Board may be appealed under the Administrative Procedures	No change	Not provided for in the APA

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				Act, 1969 PA 306, MCL 24.201 to 24.328.”		
Seth Young, PointsBet	Written	LIGA	432.643(2)	As a result of changes made due to PointsBet comment on LSBA R 432.743(12) the change was also made in LIGA for consistency	Change	Clarified to now provide: “An internet gaming platform provider must promptly notify any affected internet gaming operators on behalf of which it accepts internet wagers of any issues impacting the integrity of internet gaming.”
Robert Russel, RMC, on behalf of Playtech	Written	LIGA	432.647	Question on resettlement of accounts resulting in a negative balance	No change	Board’s explanation of the rule relates to authorized participant initiation resulting in negative account balance
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.649	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3. Title changed.
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.649(7)	Version 2 of Standard GLI-19 should be “version 3”	Change	GLI standard changed. As a result, all rules relying on prior version were changed to align with version 3. Subpart (7) removed.
Robert Russel, RMC, on behalf of Playtech	Written	LIGA	432.649	Question on how winnings of celebrity authorized participant is reported or counted	No change	To be addressed in operator and platform provider’s internal controls
Robert Russel, Regulatory	Written	LIGA	432.651	Authorize participants to be able to use same account for internet	Change	Board inserted language allowing

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Management Counselors, PC				gaming and internet sports betting		integrated accounts with conditions
Robert Russel, RMC, on behalf of GAN and DraftKings	Written	LIGA	432.651(1)(c)	Propose adding: "Notwithstanding the foregoing, the internet sports betting account may be integrated with an internet wagering account from the authorized participant's perspective allowing participants to have one account/sign-in that will provide access to both sports betting and (if applicable) internet gaming while still providing the accounting capability of separating sports betting and internet wagering upon request."	Change	Board inserted language addressing integration of accounts
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.651(1)(c)	Authorize participants to be able to use same account for internet gaming and internet sports betting	Change	Board inserted language allowing integrated accounts with conditions.
Robert Russel, RMC, on behalf of DraftKings	Written	LIGA	432.651(2)	Would like internet sports betting accounts and internet wagering accounts to interface from the participants perspective	Change	Board inserted language allowing integrated accounts with conditions
Kimberly Sutherland, LexisNexis Risk Solutions	Written		432.651a	Provided recommendations for accuracy of data in identity authentication	No change	Identity verification addressed in the rules; specific procedures to be addressed in internal controls
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.651a(2)	Insert "This subsection shall not be construed to prevent an individual from creating an internet gaming account and depositing funds to such an account even if they are prohibited from placing certain wagers."	Change	List of prohibited persons doesn't include anyone who would be prohibited from placing certain wagers

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Andrea Hansen on behalf of FanDuel	Written	LIGA	432.651a(3)	Change “demonstratable” to “demonstrable”	Change	Grammatical
Andrea Hansen on behalf of FanDuel		LIGA	432.651a(3)	Add “Such standards shall be satisfied by the use of a customer attestation that they are not a prohibited person at the time of account creation.”	No change	Customer attestation may work in some cases but not others. Board retains discretion to determine if licensee has met this obligation
Lloyd D. Levenson (Cooper Levenson)	Written	LIGA	432.652(1)(c)(ii)-(iii)	We are in favor of Rules being put in place that will allow multi-state poker agreements should the legislature pass such a bill authorizing same.	Change	Board changed to address authorized multijurisdictional internet gaming
Seth Young, PointsBet	Written	LIGA	432.653(1)(c)	Responsibility for filing an unresolved complaint with the Board to be on the authorize participant, not the operator	No change	The rule only requires that the authorized participant protection page notify authorized participants on how they may file unresolved complaints with the Board.
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.653(3)	The registration and cashier functionality are separate from the responsible gaming limit functionality.	No change	Authorized participant should have access to setting responsible gaming limit
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.654	Request to approve a shorted responsible gaming message to be included on areas of the platform outside of the responsible gaming page	No change	Rule doesn’t require the message be displayed outside the responsible gaming page
Robert Russel, RMC, on behalf of Playtech	Written	LIGA	432.655	Can authorized participant’s certifications and acknowledgments be handled by spelling them out as part of the Terms & Conditions and recording acceptance by each participant?	No change	Certifications and acknowledgments must be separate from the terms and conditions

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Andrea Hansen on behalf of FanDuel	Written	LIGA	432.655c	Propose inserting “belonging to another authorized participant”	Change	Clarifies it is intended to prevent one authorized participant from transferring funds to another authorized participant
Bill Brooks on behalf of Quinto Singleton on behalf of Nottawaseppi (NHBP)	Written	LIGA	432.655d(1)	Consider including concept that withdrawal may be delayed due to state/tribal/federal requirement and withdrawal is subject to player’s compliance with the same.	Change	Added at end: “or any other applicable state or federal law”
Lachlan Hood, PointsBet	Written	LIGA	432.657	Suggests adding language to allow an operator to close an account at any time	No change	This rule only addresses authorized participant account closure
Robert Russel, RMC, on behalf of Playtech	Written	LIGA	432.659	This draft rule contemplates the possibility of a negative balance. Are there other circumstances where a negative balance would be permissible?	No change	Although not permissible, a negative balance could occur due to an error or malfunction
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.663(2)(a)	Request definition of “significant platform failure”	No change	Operator or platform provider can define this in their internal controls
Lachlan Hood, PointsBet	Written		432.672 and 432.674	Asked whether self-exclusion can be applied across jurisdictions and channels	Change	Board struck language limiting use of information
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.672(4)	Propose striking this rule because it adds complexity and creates an unnecessary potential for confusion, and it is not “best practice” from a responsible gaming standpoint	Change	Board struck language limiting use of information
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.672(4)	Would like to exclude an excluded individual across all properties and platforms	Change	Board struck language limiting use of information

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Andrea Hansen on behalf of FanDuel		LIGA	432.674(1)	Change “and” to “or its”	No change	They only need one exclusion list
Robert Russel, RMC, on behalf of GAN	Written	LIGA	432.674(3)-(7)	Question about state-wide exclusion versus casino-specific exclusion. If an individual self excludes for casino X, can’t also exclude them for sports, right? What about if a person excludes for casino X, can we/should we exclude them from the casino Y site as well? (Same platform, but different operator)	Change	Board to leave as business decision
Tammi Barlow, William Hill	Written	LIGA	432.674(4)	Can someone self-exclude without first establishing an account?	Change	Any individual requesting placement in the self-exclusion list must submit through his or her internet wagering account or by another means authorized by the Board a completed request for self-exclusion.
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.674(7)	Propose striking this rule because it adds complexity and creates an unnecessary potential for confusion, and it is not “best practice” from a responsible gaming standpoint	Change	Board struck language limiting use of information
Andrea Hansen, (Honigman LL) on behalf of Rhea Loney, Penn Interactive	Written	LIGA	432.674 (7)	“exclude one, exclude all”	Change	Board struck language limiting use of information
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.675(1)	Insert “must knowingly”	No change	board retains discretion on enforcement

GRAY = comment received but did not result in a change to draft GOLD = duplicate comment not submitted separately

Andrea Hansen on behalf of FanDuel	Written	LIGA	432.675(1)	Add language referencing R 432.651a re: age and identity requirements	No change	Not necessary
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.675(1)	Add "This subsection shall not be construed to prevent an individual from creating an internet gaming account and depositing funds to such an account even if they are prohibited from placing certain wagers."	Change	A prohibited person may be able to create an account
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.676(1)	Add language referencing R 432.651a re: age and identity requirements	No change	Not necessary
Andrea Hansen on behalf of FanDuel	Written	LIGA	432.676(1)	Add "This subsection shall not be construed to prevent an individual from creating an internet gaming account and depositing funds to such an account even if they are prohibited from placing certain wagers."	Change	A prohibited person may be able to make certain wagers

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