

Michigan Office of Administrative Hearings and Rules
MOAHR-Rules@michigan.gov

**AGENCY REPORT TO THE
JOINT COMMITTEE ON ADMINISTRATIVE RULES (JCAR)**

1. Agency Information

Agency name:

Licensing and Regulatory Affairs

Division/Bureau/Office:

Corporations, Securities, & Commercial Licensing

Name of person completing this form:

Mackenzie Jones

Phone number of person completing this form:

231-944-3225

E-mail of person completing this form:

JonesM52@michigan.gov

Name of Department Regulatory Affairs Officer reviewing this form:

Elizabeth Arasim

2. Rule Set Information

MOAHR assigned rule set number:

2020-131 LR

Title of proposed rule set:

Unarmed Combat

3. Purpose for the proposed rules and background:

The proposed rules will provide a regulatory structure that would allow the sanctioning of kickboxing and Muay Thai events in Michigan. They will improve the reliability and competency of event officials and improve the safety and the integrity of “unarmed combat” events in Michigan.

4. Summary of proposed rules:

The proposed rules provide a regulatory structure that would allow the sanctioning of kickboxing and muay thai events in Michigan. The rules will improve the reliability of event officials and prevent the appearance of impropriety. The rules will also set a minimum purse requirement for professional unarmed combat sports. Other changes include more flexibility in obtaining a professional contestants license, adding an atomweight class for mixed martial arts, and making the mixed martial arts rules more consistent with the Association of Boxing Commissions and Combative Sports uniform rules.

5. List names of newspapers in which the notice of public hearing was published and publication dates:

The Ann Arbor News – November 18, 2021

The Grand Rapids Press – November 18, 2021

The Marquette Mining Journal – November 15, 2021

6. Date of publication of rules and notice of public hearing in Michigan Register:

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12/1/2021

7. Date, time, and location of public hearing:

12/16/2021 01:00 PM at Sun Conference Room , 2407 North Grand River Avenue, Lansing, MI 48906

8. Provide the link the agency used to post the regulatory impact statement and cost-benefit analysis on its website:

<https://ARS.apps.lara.state.mi.us/Transaction/RFRTransaction?TransactionID=1257>

9. List of the name and title of agency representative(s) attending public hearing:

Mack Jones (LARA)

Mitchell Page (LARA)

Benjamin Parker (LARA)

10. Persons submitting comments of support:

Wolfgang Mueller

11. Persons submitting comments of opposition:

Frank Garza

12. Persons submitting other comments:

Collin Rogers

13. Identify any changes made to the proposed rules based on comments received during the public comment period:

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	Name & Organization	Comments made at public hearing	Written Comments	Agency Rationale for Rule Change and Description of Change(s) Made	Rule number & citation changed
1	Frank Garza	“Contest official ‘duty of impartiality’. The concept is good but the way it is written not so much.”		R 339.204a was revised to clarify that the duty of impartiality extends to “approved event officials” who are licensed and regulated under the Unarmed Combat Regulatory Act, which include judges, timekeepers, and referees. The Commission agreed that the term should be modified to comply with statute.	R 339.204a
2	Frank Garza	“Contest official ‘duty of impartiality’. The concept is good but the way it is written not so much.”		R339.101 was revised to remove the definition of “contest official,” from “(1)(b)” in favor of listing the approved event officials within R339.204a. The Commission agreed that the term should be modified to comply with statute.	R339.101(1)(b)

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3	Wolfgang Mueller		<p>“With regard to other combat sports, it is nice to see them finally addressed in the proposed rules. I would like to see the identification card requirements for professional kickboxing and muay thai specified in the rules, as I did not see specific language addressing that aspect of the sports.”</p>	<p>Subsection 6 was added to R339.203 to add a uniform Federal Boxing ID card requirement, which is in line with the ABC Model Rules which the Commission wishes to adhere to on this change.</p>	R339.203(6)
4	Wolfgang Mueller		<p>“Rule 201, Rule 223b(2), Rule 339.223c (“accidental language”) , Rule 223c(5), and Rule 226b(a), all derive from ABC’s model rules. It does not appear that these rules are consistent with current practice and regulations relating to other unarmed combat sports in Michigan.”</p> <p>“...Rule 223b(2), Rule 339.223c (‘accidental language’)...”</p>	<p>The rule was edited so that the word “unintentional” was replaced with “accidental” to be consistent with the other existing rules mentioned in the written statement (Rule 339.223c) as well as current practice.</p>	R339.223b

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5	Wolfgang Mueller		<p>“...Rule 226b(a), all derive from ABC’s model rules. It does not appear that these rules are consistent with current practice and regulations relating to other unarmed combat sports in Michigan.”</p>	<p>The rule was edited so that the types of decisions were modified to be uniform across all sports, and in 226b(a) added the language for “Unanimous” and “Split” decisions as 226b(a)(i)(ii) and (iii). The Commission agreed that the decisions in this rule should follow current practice and align with the other sports, which is a slight departure from the ABC model rules.</p>	R339.226b(a)

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6	Collin Rogers		<p>“The revision of R339.101 Rule 101 (L) states ""Muay thai" means a form of boxing in which blows are delivered with the hand, any part of the leg below the hip, including the foot, and clinching. Does this infer that there will be no elbows allowed as a weapon in any occurrence of Muay Thai in the state of Michigan, be it pro or amateur? Elbow pads are an additional option that could become a required equipment under R339.246b Rule 246b as Muay Thai after all is "the art of eight limbs" (legs, knees, hands, elbows).”</p>	<p>The rule was edited, and the rule number changed, to add in “elbow” to the definition of “Muay thai” to read “Muay thai’ means a form of boxing in which blows are delivered with the hand, elbow, any part of the leg below the hip, including the foot, and clinching.” Instead of being listed as R339.101 (l), the definition was changed to be listed as R339.101 (k). The Commission agreed that this was in line with current practice.</p>	R339.101(l)
7	Collin Rogers		<p>“In Rule 232b (1) it is stated "A referee of a muay thai contest may penalize a muay thai contestant by deducting points from a round for any of the following fouls:</p>	<p>In 232b(1)(c), the language was changed to read “Direct attacks to the back of the knee.” In (u), the language was changed to read “Illegal tripping or sweeping the back of an instep</p>	R339.232b(1)(c) R339.232b(1)(u)

			<p>"(c) Direct attacks to the knee." Does this blanket all attacks that may contact the knee I.E. low-kicks to the calf or thigh area, front-kicks to the thigh or hip, etc.? As well as "(i) Shoving, throwing, or wrestling an opponent when pushing in a legal clinch." Does this mean a contestant may not, if the opportunity presents itself, shove an opponent out of the clinch and resume attacking? This carries into my next question of the same ruleset under "(u) Tripping or sweeping an opponent." being listed as a foul. In Muay Thai fighting, tripping and/or sweeping an opponent is a high-scoring technique very often utilized to show technical precision and timing over your opponent. I see no reason why these techniques</p>	<p>supporting leg of an opponent." The Commission agreed that this was more in line with current practice.</p>	
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			should be listed as fouls under a Muay Thai ruleset in Michigan if the wishes of the commission are to display the true nature of such a beautiful martial art and preserve the integrity of the sport.”		
8	Collin Rogers		“In most other states we've had fighters compete in, the headgear was an optional selection, based on the bout participants preference. If one participant preferred that headgear be worn, both would be required. If both agreed on no headgear, it was allowed. The same could be said for shinguards in some states.”	Added the language “if contestants agree before a contest to wear protective headgear and shin and instep protectors” to adhere to current practice of the sport.	R339.246b(7)

14. Date report completed:

7/27/2022