



August 22, 2025

Via Email (IGB.RuleComments@Illinois.gov)

Illinois Gaming Board
Attn: General Counsel Daniel Gerber
160 North LaSalle Street, Suite 300
Chicago, Illinois 60601

**Re: Illinois Gaming Board Proposed Amendments to Casino Rule 3000.600 (First Notice) -
Cashless Wagering Regulations**

Dear Mr. Gerber:

On behalf of Sightline Payments, a payments provider in regulated gaming, we would like to thank the Illinois Gaming Board (IGB) for the opportunity to provide comments on its proposed amendments to Section 3000.600 (Wagering Only with Electronic Credits, Approved Chips, Tokens and Electronic Cards) of the IGB's rules promulgated under the Illinois Gambling Act, as initially published on July 11, 2025 in the Illinois Register, Volume 49, Issue 28 (**Proposed Amendments**), which Proposed Amendments are intended to permit cashless wagering at Illinois casinos. We have worked with regulators in five other states to launch cashless gaming solutions as a third-party provider and have assisted other jurisdictions in crafting their cashless wagering regulations. Based on this experience, we respectfully submit the following comments to the Proposed Amendments.

Comments to Proposed Amendments

We support the use of the state's account-based regulations that leverage an owner licensee's casino management system. This cashless architecture provides for greater knowledge of the patron, strengthens anti-money laundering efforts, and promotes responsible gaming measures by enabling patrons to track their overall casino gaming spending and access limit setting tools.

In other jurisdictions with cashless gaming options, players are able to deposit funds into, and withdraw funds out of, their cashless wagering account. As currently written, the Proposed Amendments do not allow for Vouchers to be deposited directly into a patron's wagering account. We respectfully request the IGB consider amending Section 3000.600 (b) of the Proposed Amendments as follows:

- b) Riverboat Gaming Wagers may be made with Electronic Credits downloaded from an owner licensee's computer management system or acquired through the insertion of a Voucher issued by an Electronic Gaming Device authorized for wagering at a holder of an Owner's license or at the cashier cage, or acquired through insertion of a coupon redeemable for complimentary electronic credits, as set forth in the Owner licensee's Internal Control System.
 - 1) Prior to the Redemption Period, Vouchers may, at the patron's option, be:
 - A) used to obtain electronic credits to place a wager in Electronic Gaming Devices registered with the Board;

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- B) withdrawn only in the form of Tokens or Vouchers from the Electronic Gaming Device; ~~or~~
- C) redeemed only for United States currency at a Voucher Validation Terminal or at the cage of a holder of an Owner's license; ~~or~~
- D) deposited or otherwise credited to a patron account connected to an owner licensee's computer management system.

Allowing for the deposit of a Voucher into a patron account would increase the options available to Illinois cashless gaming patrons, enhancing the player experience and eliminating the need to use cash or cash instruments for cashless game play.

Credit Card Cash Advances

Based on our review of the Proposed Amendments, together with the proposed amendments to Section 1900.1220 (Sports Wagering Accounts) of the IGB's rules promulgated under the Illinois Sports Wagering Act likewise published on July 11, 2025 in the Illinois Register, Volume 49, Issue 28, it appears that the IGB intends to limit the use of credit cards as a funding method for casino and sports wagering. However, we were unable to locate a specific prohibition on the use of credit card cash advances. In many jurisdictions, casinos offer credit card cash advances at various locations across a property – such as at automated teller machine (ATM) kiosks or through cash advance checks permitted to be cashed at a casino cage. If the intent is to restrict credit card usage to fund wagering, ensuring parity in the regulations between cashless wagering accounts and other funding options available at casinos is an important consideration.

We welcome further discussions with the IGB regarding the Proposed Amendments prior to them being submitted to the Joint Committee on Administrative Rules for Second Notice. Please do not hesitate to contact us if you have any questions or require clarification regarding our comments. We appreciate your leadership in the introduction of cashless wagering at Illinois casinos.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Carleton". The script is fluid and cursive.

Jennifer Carleton
Chief Legal Officer
Sightline Payments

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ILLINOIS GAMING BOARD

NOTICE OF PROPOSED AMENDMENTS

- 1) Heading of the Part: Riverboat and Casino Gambling
- 2) Code Citation: 86 Ill. Adm. Code 3000
- 3)

<u>Section Numbers:</u>	<u>Proposed Actions:</u>
3000.600	Amendment
3000.614	Amendment
3000.640	Amendment
- 4) Statutory Authority: Section 5 (c) (3) of the Illinois Gambling Act ("IGA") [230 ILCS 10/5(c)(3)], which authorizes the Illinois Gaming Board ("IGB" or "Board") "to promulgate such rules and regulations as in its judgment may be necessary to protect or enhance the credibility and integrity of gambling operations authorized by this Act and the regulatory process hereunder".
- 5) A Complete Description of the Subjects and Issues Involved: In connection with ongoing efforts to modernize Illinois's casino market, the IGB continues to identify and evaluate potential rules, procedures and practices for either modification or adoption to best accommodate changes in casino gaming industry practices and ensure that the Illinois casino market maintains high levels of innovation, competition, integrity, compliance, safety, and success. One such area is wagering without physical cash, or cashless wagering as it is called in the industry. Accordingly, the IGB proposes this rulemaking to allow deployment of cashless wagering technology at Illinois casinos and to update the existing IGB approval process for casino promotions such as tournaments, enhanced payouts and giveaways.

First, the proposed amendments would allow casino patrons to wager using a digital account created with the casino's management software. Current rules generally allow casino wagering only with electronic credits, tokens, chips or promotional coupons. The proposed amendment explicitly authorizes a patron to withdraw electronic credits into the patron's player account. This change effectively completes the transaction process by allowing patrons to use their player account both to fund wagers and cash out remaining credits. These changes are consistent with the IGA and existing IGB Rules.

Additionally, the proposed rule requires that patron cashless wagering accounts meet certain criteria for IGB Self-Exclusion Program verification, age restrictions, "Know Your Customer" protocols, anti-money laundering safeguards, and other integrity and safety protections. Use of credit cards to fund cashless wagering accounts would be prohibited.

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Additionally, this rulemaking seeks to streamline and modernize the existing approval process for certain casino promotional activities. Specifically, the proposed amendment removes the pre-approval requirement for all casino tournaments, enhanced payouts, and giveaways. In its place, the amendment institutes a process in which the IGB sets a threshold for promotional activities that require prior approval and allows promotions under the threshold to proceed without prior review and approval. The IGB Administrator would review the thresholds annually to determine whether any changes are warranted based on inflation or other economic factors, regulatory and industry practices in gaming jurisdictions comparable to Illinois, and the best interests of Illinois gaming. The existing rule was last amended in 2013, so it is ripe for reevaluation given the significant changes to the Illinois casino landscape in the intervening years. These changes will add clarity, consistency and efficiency to the casino promotions approval process without jeopardizing integrity and compliance.

- 6) Published studies or reports, and sources of underlying data, used to compose this rulemaking: None
- 7) Will this proposed rulemaking replace an emergency rule currently in effect? No
- 8) Does this rulemaking contain an automatic repeal date? No
- 9) Does this proposed rulemaking contain incorporations by reference? No
- 10) Are there any other proposed rulemakings pending on this Part? Yes

<u>Section Number:</u>	<u>Proposed Action:</u>	<u>Illinois Register Citation:</u>
3000.680	New Section	47 Ill. Reg. 16752; November 22, 2024

- 11) Statement of Statewide Policy Objectives: This rulemaking does not create or expand a State mandate under the State Mandates Act [30 ILCS 805].
- 12) Time, Place, and Manner in which interested persons may comment on this proposed rulemaking: Any interested person may submit comments in writing concerning this proposed rulemaking not later than 45 days after publication of this Notice in the *Illinois Register* to:

Daniel Gerber
General Counsel
Illinois Gaming Board

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160 North LaSalle Street
Chicago, Illinois 60601

Telephone 312-814-4700
Fax 312-814-7253
IGB.RuleComments@Illinois.gov

13) Initial Regulatory Flexibility Analysis:

- A) Types of small businesses, small municipalities and not for profit corporations affected: The rulemaking will not affect small businesses.
- B) Reporting, bookkeeping or other procedures required for compliance: Licensed Casinos will need to create procedures to adapt to this rule.
- C) Types of professional skills necessary for compliance: No specific professional skills are required.

14) Small Business Impact Analysis:

- A) Types of businesses subject to the proposed rule:
 - 55 Management of Companies and Enterprises
 - 71 Arts, Entertainment, and Recreation
- B) Categories that the agency reasonably believes the rulemaking will impact, including:
 - ii. regulatory requirements;
 - viii. record keeping.

15) Regulatory Agenda on which this rulemaking was summarized: This rulemaking was not summarized in a regulatory agenda.

The full text of the Proposed Amendments begins on the next page:

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NOTICE OF PROPOSED AMENDMENTS

TITLE 86: REVENUE

CHAPTER IV: ILLINOIS GAMING BOARD

PART 3000

RIVERBOAT AND CASINO GAMBLING

SUBPART A: GENERAL PROVISIONS

Section

3000.100	Definitions
3000.101	Invalidity
3000.102	Public Inquiries
3000.103	Organization of the Illinois Gaming Board
3000.104	Rulemaking Procedures
3000.105	Board Meetings
3000.106	Code of Conduct
3000.110	Disciplinary Actions
3000.115	Records Retention
3000.120	Place to Submit Materials
3000.130	No Opinion or Approval of the Board
3000.140	Duty to Disclose Changes in Information
3000.141	Applicant/Licensee Disclosure of Agents
3000.150	Owner's and Supplier's Duty to Investigate
3000.155	Investigatory Proceedings
3000.160	Duty to Report Misconduct
3000.161	Communication with Other Agencies
3000.165	Participation in Games by Owners, Directors, Officers, Key Persons or Gaming Employees
3000.170	Fair Market Value of Contracts
3000.175	Human Trafficking Recognition Training, Reporting, and Signage
3000.180	Weapons on Riverboat
3000.190	Ethical Conduct
3000.195	Reporting Prohibited Conduct

SUBPART B: LICENSES

Section

3000.200	Classification of Licenses
3000.210	Fees and Bonds

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3000.220	Applications
3000.221	Other Required Forms
3000.222	Identification and Requirements of Key Persons
3000.223	Disclosure of Ownership and Control
3000.224	Economic Disassociation
3000.225	Business Entity and Personal Disclosure Filings
3000.230	Owner's Licenses
3000.231	Distributions
3000.232	Undue Economic Concentration
3000.234	Acquisition of Ownership Interest By Institutional Investors
3000.235	Transferability of Ownership Interest
3000.236	Owner's License Renewal
3000.237	Renewed Owner's Licenses, Term and Restrictions
3000.238	Appointment of Receiver for an Owner's License
3000.240	Supplier's Licenses
3000.241	Renewal of Supplier's License
3000.242	Amendment to Supplier's Product List
3000.243	Bankruptcy or Change in Ownership of Supplier
3000.244	Surrender of Supplier's License
3000.245	Occupational Licenses
3000.246	Renewal of Occupational Licenses
3000.250	Transferability of Licenses
3000.260	Waiver of Requirements
3000.270	Certification and Registration of Electronic Gaming Devices
3000.271	Analysis of Questioned Electronic Gaming Devices
3000.272	Certification of Voucher Systems
3000.280	Registration of All Gaming Devices
3000.281	Transfer of Registration (Repealed)
3000.282	Seizure of Gaming Devices (Repealed)
3000.283	Analysis of Questioned Electronic Gaming Devices (Repealed)
3000.284	Disposal of Gaming Devices
3000.285	Certification and Registration of Voucher Validation Terminals
3000.286	Contracting Goals for Owners Licensees
3000.287	Independent Outside Testing Laboratories
3000.288	Minimum Duties of Independent Outside Testing Laboratories

SUBPART C: OWNER'S INTERNAL CONTROL SYSTEM

Section

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3000.300	General Requirements – Internal Control System
3000.310	Approval of Internal Control System
3000.320	Minimum Standards for Internal Control Systems
3000.330	Review of Procedures (Repealed)
3000.340	Operating Procedures (Repealed)
3000.350	Modifications (Repealed)

SUBPART D: HEARINGS ON NOTICE OF DENIAL,
RESTRICTION OF LICENSE, PLACEMENT ON BOARD EXCLUSION LIST OR
REMOVAL FROM BOARD EXCLUSION LIST OR SELF-EXCLUSION LIST

Section	
3000.400	Coverage of Subpart
3000.405	Requests for Hearings
3000.410	Appearances
3000.415	Discovery
3000.420	Motions for Summary Judgment
3000.424	Subpoena of Witnesses
3000.425	Proceedings
3000.430	Evidence
3000.431	Prohibition on Ex Parte Communication
3000.435	Sanctions and Penalties
3000.440	Transmittal of Record and Recommendation to the Board
3000.445	Status of Applicant for Licensure or Transfer Upon Filing Request for Hearing

SUBPART E: CRUISING

Section	
3000.500	Riverboat Cruises
3000.510	Cancelled or Disrupted Cruises
3000.520	Organization Gaming Facilities
3000.530	Modification of Organization Gaming Facilities
3000.540	Temporary Facilities
3000.550	Relocating Gaming Facilities
3000.560	Patron Admissions to Gaming Facilities

SUBPART F: CONDUCT OF GAMING

Section

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3000.600	Wagering Only with Electronic Credits, Approved Chips, Tokens and Electronic Cards
3000.602	Disposition of Unauthorized Winnings
3000.605	Authorized Games
3000.606	Gaming Positions
3000.610	Publication of Rules and Payout Ratio for Live Gaming Devices
3000.614	Tournaments, Enhanced Payouts and Give-aways
3000.615	Payout Percentage for Electronic Gaming Devices
3000.616	Cashing-In
3000.620	Submission of Chips for Review and Approval
3000.625	Chip Specifications
3000.630	Primary, Secondary and Reserve Sets of Gaming Chips
3000.631	Tournament Chips
3000.635	Issuance and Use of Tokens for Gaming
3000.636	Distribution of Coupons for Complimentary Chips, Tokens, Vouchers, Cash and Electronic Credits
3000.640	Exchange of Chips, Tokens, and Vouchers
3000.645	Receipt of Gaming Chips or Tokens from Manufacturer or Distributor
3000.650	Inventory of Chips
3000.655	Destruction of Chips, Tokens, and Vouchers
3000.660	Minimum Standards for Electronic Gaming Devices
3000.661	Minimum Standards for Voucher Systems
3000.665	Integrity of Electronic Gaming Devices
3000.666	Bill Validator Requirements
3000.667	Integrity of Voucher Systems
3000.670	Computer Monitoring Requirements of Electronic Gaming Devices
3000.671	Computer Monitoring Requirements of Voucher Systems

SUBPART G: EXCLUSION OF PERSONS

Section	
3000.700	Organization of Subpart
3000.701	Duty to Exclude
3000.705	Voluntary Self-Exclusion Policy (Repealed)
3000.710	Distribution and Availability of Board Exclusion List
3000.720	Criteria for Exclusion or Ejection and Placement on the Board Exclusion List
3000.725	Duty of Licensees
3000.730	Procedure for Entry of Names
3000.740	Petition for Removal from the Board Exclusion List

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3000.745	Voluntary Self-Exclusion Policy
3000.750	Establishment of a Self-Exclusion List
3000.751	Locations to Execute Self-Exclusion Forms
3000.755	Information Required for Placement on the Self-Exclusion List
3000.756	Stipulated Sanctions for Failure to Adhere to Voluntary Self-Exclusion
3000.760	Distribution and Availability of Confidential Self-Exclusion List
3000.770	Duties of Licensees
3000.780	Request for Removal from the IGB Self-Exclusion List
3000.782	Required Information, Recommendations, Forms and Interviews
3000.785	Appeal of a Notice of Denial of Removal
3000.786	Duties of Owner Licensees to Persons Removed from the Self-Exclusion List
3000.787	Placement on the Self-Exclusion List Following Removal
3000.790	Duties of the Board

SUBPART H: SURVEILLANCE AND SECURITY

Section	
3000.800	Required Surveillance Equipment
3000.810	Riverboat and Board Surveillance Room Requirements
3000.820	Segregated Telephone Communication
3000.830	Surveillance Logs
3000.840	Storage and Retrieval
3000.850	Dock Site Board Facility
3000.860	Maintenance and Testing

SUBPART I: LIQUOR LICENSES

Section	
3000.900	Liquor Control Commission
3000.910	Liquor Licenses
3000.920	Disciplinary Action
3000.930	Hours of Sale

SUBPART J: OWNERSHIP AND ACCOUNTING RECORDS AND PROCEDURES

Section	
3000.1000	Ownership Records
3000.1010	Accounting Records
3000.1020	Standard Financial and Statistical Records

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3000.1030	Annual and Special Audits and Other Reporting Requirements
3000.1040	Accounting Controls Within the Cashier's Cage
3000.1050	Procedures for Exchange of Checks Submitted by Gaming Patrons and Granting Credit
3000.1060	Handling of Cash at Gaming Tables
3000.1070	Tips or Gratuities
3000.1071	Admission Tax and Wagering Tax
3000.1072	Cash Reserve Requirements

SUBPART K: SEIZURE AND DISCIPLINARY HEARINGS

Section

3000.1100	Coverage of Subpart
3000.1105	Duty to Maintain Suitability
3000.1110	Board Action Against License or Licensee
3000.1115	Complaint
3000.1120	Appearances
3000.1125	Answer
3000.1126	Appointment of Hearing Officer
3000.1130	Discovery
3000.1135	Motions for Summary Disposition
3000.1139	Subpoena of Witnesses
3000.1140	Proceedings
3000.1145	Evidence
3000.1146	Prohibition of Ex Parte Communication
3000.1150	Sanctions and Penalties
3000.1155	Transmittal of Record and Recommendation to the Board

AUTHORITY: Implementing and authorized by the Illinois Gambling Act [230 ILCS 10], Video Gaming Act [230 ILCS 40], Sports Wagering Act [230 ILCS 45], and Illinois Horse Racing Act of 1975 [230 ILCS 5].

SOURCE: Emergency rule adopted at 15 Ill. Reg. 11252, effective August 5, 1991, for a maximum of 150 days; adopted at 15 Ill. Reg. 18263, effective December 10, 1991; amended at 16 Ill. Reg. 13310, effective August 17, 1992; amended at 17 Ill. Reg. 11510, effective July 9, 1993; amended at 20 Ill. Reg. 5814, effective April 9, 1996; amended at 20 Ill. Reg. 6280, effective April 22, 1996; emergency amendment at 20 Ill. Reg. 8051, effective June 3, 1996, for a maximum of 150 days; amended at 20 Ill. Reg. 14765, effective October 31, 1996; amended at 21 Ill. Reg. 4642, effective April 1, 1997; emergency amendment at 21 Ill. Reg. 14566, effective

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October 22, 1997, for a maximum of 150 days; emergency amendment at 22 Ill. Reg. 978, effective December 29, 1997, for a maximum of 150 days; amended at 22 Ill. Reg. 4390, effective February 20, 1998; amended at 22 Ill. Reg. 10449, effective May 27, 1998; amended at 22 Ill. Reg. 17324, effective September 21, 1998; amended at 22 Ill. Reg. 19541, effective October 23, 1998; emergency amendment at 23 Ill. Reg. 8191, effective July 2, 1999 for a maximum of 150 days; emergency expired November 28, 1999; amended at 23 Ill. Reg. 8996, effective August 2, 1999; amended at 24 Ill. Reg. 1037, effective January 10, 2000; amended at 25 Ill. Reg. 94, effective January 8, 2001; amended at 25 Ill. Reg. 13292, effective October 5, 2001; proposed amended at 26 Ill. Reg. 9307, effective June 14, 2002; emergency amendment adopted at 26 Ill. Reg. 10984, effective July 1, 2002, for a maximum of 150 days; adopted at 26 Ill. Reg. 15296, effective October 11, 2002; amended at 26 Ill. Reg. 17408, effective November 22, 2002; emergency amendment at 27 Ill. Reg. 10503, effective June 30, 2003, for a maximum of 150 days; amended at 27 Ill. Reg. 15793, effective September 25, 2003; amended at 27 Ill. Reg. 18595, effective November 25, 2003; amended at 28 Ill. Reg. 12824, effective August 31, 2004; amended at 31 Ill. Reg. 8098, effective June 14, 2007; amended at 32 Ill. Reg. 2967, effective February 15, 2008; amended at 32 Ill. Reg. 3275, effective February 19, 2008; amended at 32 Ill. Reg. 7357, effective April 28, 2008; amended at 32 Ill. Reg. 8592, effective May 29, 2008; amended at 32 Ill. Reg. 8931, effective June 4, 2008; amended at 32 Ill. Reg. 13200, effective July 22, 2008; amended at 32 Ill. Reg. 17418, effective October 23, 2008; amended at 32 Ill. Reg. 17759, effective October 28, 2008; amended at 32 Ill. Reg. 17946, effective November 5, 2008; amended at 34 Ill. Reg. 3285, effective February 26, 2010; amended at 34 Ill. Reg. 3748, effective March 11, 2010; amended at 34 Ill. Reg. 4768, effective March 16, 2010; amended at 34 Ill. Reg. 5200, effective March 24, 2010; amended at 34 Ill. Reg. 15386, effective September 23, 2010; amended at 36 Ill. Reg. 13199, effective July 31, 2012; amended at 37 Ill. Reg. 12050, effective July 9, 2013; amended at 37 Ill. Reg. 18255, effective November 1, 2013; amended at 38 Ill. Reg. 2808, effective January 8, 2014; amended at 38 Ill. Reg. 21471, effective October 29, 2014; amended at 39 Ill. Reg. 4362, effective March 10, 2015; amended at 39 Ill. Reg. 12312, effective August 18, 2015; amended at 40 Ill. Reg. 12776, effective August 19, 2016; amended at 41 Ill. Reg. 380, effective December 29, 2016; amended at 41 Ill. Reg. 12840, effective September 28, 2017; emergency amendment at 43 Ill. Reg. 9801, effective August 23, 2019, for a maximum of 150 days; emergency amendment at 43 Ill. Reg. 10512, effective September 5, 2019, for a maximum of 150 days; emergency amendment at 43 Ill. Reg. 10733, effective September 13, 2019, for a maximum of 150 days; amended at 44 Ill. Reg. 521, effective December 30, 2019; amended at 44 Ill. Reg. 3224, effective February 4, 2020; emergency amendment at 44 Ill. Reg. 6426, effective April 7, 2020, for a maximum of 150 days; emergency expired September 3, 2020; amended at 44 Ill. Reg. 11156, effective June 17, 2020; amended at 44 Ill. Reg. 13653, effective August 6, 2020; amended at 45 Ill. Reg. 14449, effective November 2, 2021; amended at 46 Ill. Reg. 5542, effective March 16, 2022; amended at 47 Ill. Reg. 8454, effective May 30, 2023; amended at 49 Ill. Reg. 747, effective December 31, 2024; amended at

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49 Ill. Reg. 6960, effective May 1, 2025; amended at 49 Ill. Reg. _____, effective _____.

SUBPART F: CONDUCT OF GAMING

Section 3000.600 Wagering Only with Electronic Credits, Approved Chips, Tokens and Electronic Cards

- a) Except as provided in subsection (b), Riverboat Gaming Wagers may be made only with Electronic Credits, Tokens, Chips or promotional coupons issued by the holder of an Owner's license and approved by the Administrator. All Chips, Tokens and Electronic Cards must be approved by the Administrator and purchased from the holder of an Owner's license. Chips, Tokens or Electronic Cards may only be used as set forth in the owner licensee's Internal Control System. Promotional coupons may only be used as wagers as set forth in the Owner's licensee's Internal Control System. At the patron's option, Electronic Credits may either be used as a Wager on an Electronic Gaming Device or be withdrawn only in the following manner: ~~form of Tokens and/or a Voucher issued from the Electronic Gaming Device.~~
 - 1) Tokens and/or a Voucher issued from the Electronic Gaming Device; or
 - 2) Added back to a patron account connected to an owner licensee's computer management system.
- b) Riverboat Gaming Wagers may be made with Electronic Credits downloaded from an owner licensee's computer management system or acquired through the insertion of a Voucher issued by an Electronic Gaming Device authorized for wagering at a holder of an Owner's license or at the cashier cage, or acquired through insertion of a coupon redeemable for complimentary electronic credits, as set forth in the Owner licensee's Internal Control System.
 - 1) Prior to the Redemption Period, Vouchers may, at the patron's option, be:
 - A) used to obtain electronic credits to place a wager in Electronic Gaming Devices registered with the Board;
 - B) withdrawn only in the form of Tokens or Vouchers from the Electronic Gaming Device; or

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- C) redeemed only for United States currency at a Voucher Validation Terminal or at the cage of a holder of an Owner's license.
- 2) At any time prior to the Expiration Date, Vouchers may be redeemed for United States currency at the cage of a holder of an Owner's license.
- c) Unless the Electronic Credits are exclusively promotional or complimentary, any patron account used to add or withdraw Electronic Credits, or purchase or redeem Chips or Tokens, must comply with the account requirements found in Part 1900 of Title 11.

(Source: Amended at 49 Ill. Reg. _____, effective _____)

Section 3000.614 Tournaments, Enhanced Payouts and Give-aways

- a) For purposes of this Section, the following terms shall have the following meanings:
 - 1) **Enhanced Payout:** An event sponsored by a Riverboat Gaming Operation wherein Gaming patrons participate in a Game or an approved variation of a Game and thereby qualify for receiving, upon a specified outcome in such Game, a payment or thing of value in excess of payouts contained in the Internal Control System or as displayed on the Gaming Device. The cost of such excess payment or thing of value may be subtracted from Gross Receipts in determining Adjusted Gross Receipts.
 - 2) **Tournament:** A contest sponsored by a Riverboat Gaming Operation wherein patrons play or wager on a Game or Games and receive, separate from any applicable winnings from wagers, prizes that include the total of any entry fees to the contest and cash or non-cash prizes offered by the Riverboat Gaming Operation in conjunction with the contest. The cost of cash or non-cash prizes and entry fees for a Tournament may not be subtracted from Gross Receipts in determining Adjusted Gross Receipts.
 - 3) **Give-away:** A Game where patron entry to the Game is determined by attendance on a riverboat or the attainment of a certain outcome or an accumulation of points/credits on a Gaming Device. The cost of prizes paid in a Give-away may not be subtracted from Gross Receipts in

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Determining Adjusted Gross Receipts.

- b) Tournaments, Enhanced Payouts or Give-aways may only be conducted when:
- 1) Documented in the Internal Control System of the holder of an Owner's License; and
 - 2) In conformance with the Act, this Part and the Internal Control System; and
 - 3) Approved by the Administrator.
- c) The Internal Control System provisions for the conduct of Tournaments, Enhanced Payouts or Give-aways involving Gaming shall be submitted by the holder of an Owner's License pursuant to Sections 3000.300 through 3000.320.
- d) Requests for the conduct of specific Tournaments, Enhanced Payouts and Give-aways involving Gaming must be received in writing by the Administrator at least 14 days prior to the proposed date of implementation. The Board may require prior approval for promotional activities under this Section meeting certain published thresholds set by the Administrator. The Administrator will review the thresholds for potential modification no fewer than once per year. In setting the thresholds, the Administrator shall consider all relevant factors, including inflation and other economic factors, regulatory and industry practices in gaming jurisdictions comparable to Illinois, licensee and stakeholder input, and the best interests of Illinois gaming.
- e) Any Tournament, Enhanced Payout or Give-away for which eligibility or amount of any award or prize is determined by an information system shall be reasonably tested in advance to ensure the integrity of the Tournament, Enhanced Payout or Give-away.

(Source: Amended at 49 Ill. Reg. _____, effective _____)

Section 3000.640 Exchange of Chips, Tokens, and Vouchers

- a) Chips shall be issued to a person only at the request of such person and shall not be given as change in any other transaction. Chips shall only be issued to gaming~~Riverboat~~ patrons at cashier cages or at the Live Gaming Devices and

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shall be redeemed only at a cashier cage.

- b) Tokens shall only be issued upon the request of a patron from a cashier cage, Token Dispenser or from employees of the holder of an ~~owner's~~ owner's license at the Electronic Gaming Device area. Tokens shall be redeemed only at a cashier cage.
- c) Vouchers shall only be issued by approved Voucher Printers in Electronic Gaming Devices or at a cashier cage.
 - 1) Prior to their Redemption Dates, Vouchers may be redeemed for:
 - A) Electronic Credit at Electronic Gaming Devices, which Credit may then be redeemed as a new Voucher or in Tokens, for EGDs equipped for Tokens; and
 - B) United States currency at Voucher Validation Terminals and a cashier cage ~~in at the gaming operation holder of an Owner's license.~~
 - 2) After their Redemption Dates and prior to their Expiration Dates, Vouchers may be redeemed for United States currency only at a cashier cage ~~in a gaming operation of the holder of an Owner's license.~~
- d) Chips, Tokens or Vouchers shall only be redeemed by ~~a holder of an~~ owner's licensee ~~Owner's license~~ from its patrons and shall not be knowingly redeemed from any non-patron source, except where:
 - 1) employees of the holder present for redemption Chips or Tokens as provided in the approved Internal Control System of the holder;
 - 2) another owner's licensee ~~holder of an Owner's License~~ presents for redemption Tokens which have been lawfully received by that holder;
 - 3) subject to approval by the Administrator, a person licensed to conduct Gaming in another jurisdiction presents for redemption Tokens which have been lawfully received by that person; or
 - 4) the prior written approval for the redemption of the Chips or Tokens is

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obtained in each instance from the Administrator.

- e) Each owner's licensee~~Riverboat~~ shall promptly redeem its own Chips, Tokens and Vouchers by cash or by check dated the day of such redemption on an account of the gaming operation~~Riverboat~~, as requested by the patron, except when the Chips, Tokens and Vouchers were obtained or used unlawfully.
- f) Each gaming operation~~Riverboat~~ may demand the redemption of its Chips, Tokens or Vouchers from any person in possession of them and that person shall redeem the Chips, Tokens or Vouchers upon presentation by the gaming operation~~Riverboat Gaming Operation~~ of an equivalent amount of cash or check dated the same day on an account of the owner's licensee~~Riverboat~~.
- g) Each gaming operation~~Riverboat~~ shall ~~post~~cause to be posted and remain posted in a prominent place:
 - 1) On the front of a cashier cage a sign that reads as follows: "Gaming Chips, Tokens or Vouchers issued by another casino~~Riverboat~~ may not be used, exchanged or redeemed herein~~in this Riverboat~~";
 - 2) On Electronic Gaming Device Token redemption booths a sign that reads as follows: "Tokens or Vouchers issued by another casino~~Riverboat~~ may not be used, exchanged or redeemed herein~~in this Riverboat~~"; and
 - 3) On Voucher Validation Terminals a sign that reads as follows: "Vouchers issued by another casino~~Riverboat~~ may not be used, exchanged or redeemed herein~~in this Riverboat~~".

(Source: Amended at 49 Ill. Reg. _____, effective _____)



Daniel Gerber, General Counsel
Illinois Gaming Board
160 North LaSalle Street
Chicago, IL 60601
IGB.RuleComments@Illinois.gov

August 25, 2025

Dear Mr. Gerber:

PENN Entertainment, Inc. ("PENN") writes to comment on the Illinois Gaming Board ("IGB")'s proposed amendments to 86 Ill. Adm. Code 3000, specifically those regarding marketing approvals. PENN supports the IGB's proposed amendments and looks forward to working with IGB staff to implement these amendments within its promotional activity processes.

PENN supports the IGB's efforts to streamline and modernize the existing process for certain casino promotional activities by removing the pre-approval requirement for all casino tournaments, enhanced payouts, and giveaways. The proposed process in which the IGB sets a threshold for promotional activities that require prior approval, and that is reviewed annually by the IGB Administrator, will add clarity, consistency, and efficiency to the casino promotions approval process without jeopardizing integrity and compliance.

Please do not hesitate to reach out should you have any questions or concerns.

Respectfully,

Samantha Haggerty

Samantha Haggerty
Deputy Chief Compliance Officer, Regulatory Affairs Counsel

From: cfiocca@illinoiscasinogaming.org
To: [IGB.RuleComments](#)
Subject: [External] Additional Comment for Section 3000.614
Date: Wednesday, September 17, 2025 3:42:32 PM

Good afternoon,

Another question has come up with regards to pending rule change 3000.614 specific to the thresholds that will be set by the Administrator. Has the IGB determined what the thresholds will be for specifically? Meaning will the threshold be established for the total amount of the Tournament, Enhanced Payout or Give-Away or will it be a threshold set per amount to be won/given away/gifted to each patron.

Example:

Let's say the casino is going to hold a 4-week pots and pans gift give-away. The weekly gift has a dollar value of \$100 making it a \$400 per-patron total for this give-away. The casino expects to have 1,000 patrons participate in this give-away bringing the total expected cost of the give-away to \$400,000.

Based on the example above, will the threshold be based on:

- The overall cost of the give-away –\$400,000
- The total cost per patron - \$400
- The total value of the individual gift -\$100

If the threshold will be based on the overall cost of the Tournament, Enhanced Payout or Give-Away, we ask that consideration be taken into account for the different revenues and volume of patrons for each casino. Using the example above, a casino like Rivers may expect to have 5,000 patrons participate bringing their total cost to \$2million whereas a smaller casino like Metropolis may only expect the 1000. Had the Administrator set a threshold of any give-away where the total amount of the give away is under \$1million does not need approval, Rivers would likely be required to still submit because their volumes are much higher.

Please reach out with any questions.

Kind regards,

Cindy

Cindy R. Fiocca-Bloom

Executive Director | Illinois Casino Gaming Association
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ILLINOIS GAMING BOARD

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MEMORIALIZATION OF *EX PARTE* COMMUNICATION

Reporter: Alex Sobor, Legislative Liaison

Date: September 3, 2025

Subject of the Communication:

Discussion of proposed Rules 3000.600, 3000.614, and 3000.640 regarding cashless wagering, the approval process for promotions and exchanges of chips and vouchers in casinos.

IGB Employees Present:

Dan Gerber, General Counsel; Barry Jacobs, Assistant General Counsel; Alex Sobor, Legislative Liaison.

Person(s) Communicating to the IGB:

Cindy Fiocca-Bloom, Executive Director, IL Casino Gaming Association
Travis Hankins, President, IL Casino Gaming Association

Date of Communication:

September 3, 2025

Mode of Communication:

WebEx meeting

State What Action, if Any, the Person Requested or Recommended:

Rule 3000.600(c) provides that a patron's electronic wagering account must meet certain minimum criteria specified in Rule 1900.1220 for transactions other than those involving exclusively promotional or complimentary electronic credits. Rule 3000.614(d) provides that the Board may require prior approval of proposed promotional activities that exceed published thresholds set by the Administrator. Rule 3000.640 provides for the exchange of chips, tokens, and vouchers at casinos. On behalf of ICGA members, Director Cindy Fiocca-Bloom and President Travis Hankins requested that the Board consider revisions to proposed Rules 3000.600, 3000.614, and 3000.640 that clarify the purpose and intent of the rules without creating unnecessary hardship or confusion for casino operators.

Nature and Substance of Oral Communications:

Dan Gerber explained that proposed changes to Rule 3000.600, 3000.614, and 3000.640 are part of an effort by the IGB to modernize and streamline casino rules and are not intended to complicate operational processes.

Fiocca-Bloom asked that Rule 3000.614 (b)(3) be revised to reflect proposed changes to Rule 300.614(d). Fiocca-Bloom and Gerber agreed that Rule 614(b)(3) should be revised to state, “Approved by the Administrator except as otherwise provided in Subsection (d).”

Fiocca-Bloom asked that the time period expressed in Rule 3000.614 (d) be shortened from 14 to 7 days as casinos now electronically request approval. Gerber will discuss this request with Field Operations and will contact the ICGA with any issues.

Fiocca-Bloom noted that currently casinos specify different time frames for the submission of promotions to the IGB and expressed that the rule change could help add consistency to casinos’ promotion submission practices.

Gerber responded that the IGB is renewing efforts to have discussions with the casino industry, as well as internally, to examine and reflect on existing systems and standards and that casino operational differences are ripe for such discussions.

Fiocca-Bloom also requested that the term “tokens” be removed from Rule 3000.640.

Gerber responded that while he agreed, “tokens” appears in the Illinois Gambling Act and therefore must remain in the rule. Mr. Gerber said that nevertheless, a casino may decide not to accept tokens.

Hankins asked for a point of clarification, asking what must be included in a submission. Hankins noted that the lag time for creation of artwork significantly affects submissions. Hankins suggested it would be helpful for IGB to clarify submissions for cashless wagering.

Hankins also asked if the intent of Rule 3000.614 was to speed up the Administrator approval process for promotions by setting thresholds that require Administrator approval.

Gerber confirmed that like rules for video gaming promotions, Rule 3000.614(d)(3) sets thresholds for casino promotions to expedite the Administrator approval process.

Fiocca-Bloom questioned the rationale behind changes to Rule 3000.600. Fiocca-Bloom noted that new subsection (c) of the rule requires patron accounts to comply with Rule 1900.1220. Fiocca-Bloom stated that casinos do not presently require that a patron provide a social security number or phone to open a patron account.

Gerber responded that the requirement that patron accounts comply with Rule 1900.1220 is an attempt to provide uniformity to digital wallets used in casinos, sports books and internet gaming. Gerber indicated that while the IGB agrees that the phone number requirement can be waived and the athlete section of Rule 1900.1220 is not germane to casino wagering, the social security requirement will stand.

Hankins asked whether subsection (c) of Rule 3000.600 is intended to apply cashless wagering rather than the player club card.

Gerber confirmed that subsection (c) applies when an individual is setting up the account to use a digital wallet for cashless wagering but would not apply to free play; when a patron funds a wager using

electronic credits that are exclusively promotional or compliments of the casino. Gerber clarified that this rule was not intended for collecting information at the cage or elsewhere.

Hankins noted that the phrase “patron account” used in Rule 3000.600(c) can be confused with a patron’s awards account and suggested changing the phrase to “digital wallet” or another term or phrase.

Gerber suggested adding a definition for digital wallet or patron wagering account. IGB staff will brainstorm language to define an account used by patrons to fund wagers and will circulate proposed language to the ICGA for comment.

Written Communications:

None.