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The Massachusetts Gaming Commission Announces Suitability Decision Regarding Slots-Parlor Applicant, Raynham Park LLC

Today the Massachusetts Gaming Commission (Commission) announces determinations of suitability regarding gaming applicant, **Raynham Park LLC** and its qualifiers, in pursuit of the state's single slots-parlor license.

The application for a gaming license has two parts. The first, called the Phase 1 application, essentially focuses on the qualifications and suitability of the applicants and its "qualifiers" (entities and individuals) to hold a gaming license. The Phase 2 application is 'site specific' and focuses on site, design, finance, operation, community mitigation and other attributes of the gaming facility itself. As one of the prerequisites to submitting a Phase 2 (and final) application to the Commission outlining the specifics of its proposal for a gaming establishment, all applicants must first be issued a positive determination of suitability by the Commission. The burden is on each applicant to establish its suitability to hold a gaming license by "clear and convincing evidence." To that end, all applicants that submitted a Phase 1 application have subjected themselves to a thorough background investigation of all its qualifiers, both individuals and entities. The investigations are being conducted and remain ongoing by the Investigations and Enforcement Bureau (Bureau) of the Commission.

On July 26, 2013 at the Boston Convention and Exhibition Center, the Commission conducted an adjudicatory hearing relative to the completion of the background investigation based on the Phase 1 application submitted by Raynham Park LCC. As a result of the comprehensive background investigation, a lengthy adjudicatory proceeding and an intensive deliberation conducted by the five- member gaming commission, the Commission finds by a unanimous vote that Applicant, Raynham Park LLC has met its burden of proof and accordingly is issued a **POSITIVE** determination of suitability. The positive finding of suitability also includes conditions set forth by the Commission. The Commission finds by a unanimous vote that qualifier **Wathe Manoukian** has met his burden of proof and accordingly is issued a **POSITIVE** determination of suitability. The Commission finds by a majority vote that qualifier **Robert W. Green** has met his burden of proof and accordingly is issued a **POSITIVE** determination of suitability.

In summary, the Commission issued a positive determination of suitability to Raynham Park LLC based on the following considerations, citing directly from the decision:

- The Commission finds Mr. Green's behavior described above and his testimony in this proceeding extremely troubling. Mr. Green does not show any understanding of why the relationship with Mr. Brennan and the transactions they entered into show



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a serious lack of judgment on his part.... While he did express “regret” it is difficult for the Commission to determine whether the regret is for his failure in judgment or merely for the inconvenience his relationship with Brennan created as part of the gaming licensing process.

- Nevertheless, Mr. Green provided clear and convincing evidence of seventeen (17) years of good conduct and a majority of the Commissioner’s accepts this as a compelling mitigating factor.
- The Commission finds Mr. Manoukian credible. It accepts Mr. Manoukian’s testimony that Applicant will have the capital structure outlined in Applicant Exhibit 3. The Commission finds that based upon the testimony provided by Mr. Manoukian, the information provided by Mr. Everett and Applicant’s Exhibit 3 that Mr. Manoukian has met the burden of proving by clear and convincing evidence that he meets the standards for suitability under M.G.L c 23K §12.

The written decision issued by the Commission regarding Raynham Park LLC is available in its entirety [here](#).



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