



NOTICE OF MEETING AND AGENDA

Pursuant to the Massachusetts Open Meeting Law (G.L. c. 30A, §§ 18-25), St. 2022, c. 107, and St. 2023, c. 2, notice is hereby given of a public meeting of the **Massachusetts Gaming Commission**. The meeting will take place:

Thursday | July 11, 2024 | 10:00 a.m.
VIA REMOTE ACCESS: 1-646-741-5292
MEETING ID/ PARTICIPANT CODE: 111 464 9610
All meetings are streamed live at www.massgaming.com.

Please note that the Commission will conduct this public meeting remotely utilizing collaboration technology. Use of this technology is intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public. If there is any technical problem with the Commission's remote connection, an alternative conference line will be noticed immediately on www.massgaming.com.

All documents and presentations related to this agenda will be available for your review on the morning of the meeting date by visiting our website and clicking on the News header, under the Meeting Archives drop-down.

PUBLIC MEETING - #524

1. Call to Order – Jordan Maynard, Interim Chair
2. Meeting Minutes
 - a. December 14, 2022 **VOTE**
3. Administrative Update – Dean Serpa, Executive Director
 - a. Discussion of Commissioner Involvement in Hiring Process for Staff Vacancies
 - I. Chief Enforcement Counsel/Assistant Director of the IEB **VOTE**
 - II. Division Chief, Sports Wagering **VOTE**
4. Legislative Update – Commissioner Brad Hill
5. Succession of Officers and Positions – All Commissioners **VOTE**



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6. Community Affairs Division – Joe Delaney, Chief of Community Affairs
 - a. Community Mitigation Fund, Everett FY 2025 Public Safety Application **VOTE**

7. Sports Wagering Division – Bruce Band, Director of Sports Wagering
 - a. Request for Amendment to House Rules – Andrew Steffen, Sports Wagering Operations Manager
 - I. Fanatics **VOTE**
 - II. Penn Sports Interactive **VOTE**
 - b. Extension of Waiver issued to DraftKings and BetMGM from 205 CMR 257.03(4) - Crystal Beauchemin, Sports Wagering Business Manager **VOTE**

8. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. Debrief and Discussion of Next Steps from MGC Sponsored Conference

9. Legal – Todd Grossman, General Counsel
 - a. Discussion of Amendments to Ohio Administrative Code Rule 3775- 16-09: Promotions and Bonuses prohibiting promotions and bonuses unrelated to gaming transactions and Discussion of Possible Amendments to 205 CMR 256 Related to Promotions and Bonuses – Carrie Torrisi, Deputy General Counsel

10. Investigations and Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
 - a. Encore Boston Harbor Request for Amendment to Beverage License – Kara O’Brien, Licensing Division Chief **VOTE**
 - b. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty Pursuant to 205 CMR 232.02(2) regarding noncompliance with permissible sports wagering offerings by Fanatics Betting and Gaming. – Zachary Mercer, Enforcement Counsel; Kathleen Kramer, Interim Chief Enforcement Counsel; Caitlin Monahan, IEB Director **VOTE**
 - c. Update on IEB review of potential noncompliance of 205 CMR 248.04(4) by American Wagering Inc., d/b/a Caesars Sportsbook, a temporary Category 3 sports wagering licensee, as requested by the Commission – Zachary Mercer, Enforcement Counsel
 - d. Security at the Casino Facilities Executive Session **VOTE**
The Commission anticipates that it will meet in executive session in accordance with G.L. c.30A, §21(a)(4), c.30A, §21(a)(7), and G.L. c. 4,



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§7(26)(f) to discuss the use and deployment of security personnel or devices, or strategies with respect thereto at Encore Boston Harbor, MGM Springfield and Plainridge Park Casino, specifically with regard to firearms and parking garage security, and to discuss investigatory materials related to MGM parking garage security, necessarily compiled out of the public view by the IEB the disclosure of which materials would probably so prejudice the possibility of effective law enforcement that such disclosure would not be in the public interest. The public session of the Commission meeting will not reconvene at the conclusion of the executive session.

11. Commissioner Updates

12. Other Business - Reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: July 9, 2024 | 10:00 a.m. EST

July 9, 2024



Jordan M. Maynard, Interim Chair

If there are any questions pertaining to accessibility and/or further assistance is needed, please email Grace.Robinson@massgaming.gov.



Massachusetts Gaming Commission



Massachusetts Gaming Commission Meeting Minutes

Date/Time: December 14, 2022, 10:00 a.m.
Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 112 381 2019

The Commission conducted this public meeting remotely utilizing collaboration technology. The use of this technology was intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public.

Commissioners Present:

Chair Cathy Judd-Stein
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Jordan Maynard

1. [Call to Order](#) (00:00)

Chair Judd-Stein called to order the 411th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

Chair Judd-Stein began the meeting by stating that the Commission's principal responsibility in reviewing the sports wagering applications was to ensure the integrity of the gaming industry in Massachusetts. She stated that the Commission would maintain strict oversight of gaming establishments and sports wagering operators. She highlighted that awarding a sports wagering license was a privilege; and that operators would be held to the highest standards of compliance on a continuing basis. She stated that the Commission's mission permits the creation of a fair, transparent process that engendered the confidence of the public and maximized the benefits to the Commonwealth. She then briefly explained the agenda for this public meeting.

2. [Legal Framework relative to the award of a Category 3 sports wagering operator license](#) (06:08)

General Counsel Todd Grossman stated that this meeting was the Commission's opportunity to evaluate the application for a category three tethered sports wagering license submitted by American Wagering Inc. d/b/a Caesars Sportsbook ("Caesars").

General Counsel Grossman stated that G.L. Chapter 23N, § 6(3) allowed the Commission to issue a category three sports wagering license to any entity that offered sports wagering through a mobile application or platform. He stated that there was a cap of seven category three licenses that could be awarded that were not connected to a category one or two sports wagering license. He stated that the applicant today was connected to Wynn MA, LLC d/b/a Encore Boston Harbor ("EBH") which was awarded a license last week. He noted that only two tethered category three operators could be connected to a category one operator.

General Counsel Grossman stated that 205 CMR 218 set out the application requirements, standards, and procedures. He stated that the regulation sets out factors and considerations for the Commission to analyze in the evaluation process, but that the regulations did not set out a particular order to review factors nor did the regulation assign particular weight to the factors. He stated that the Commission may require that the applicant provide additional information or documents the Commission deemed appropriate.

General Counsel Grossman noted that the evaluation of this application was being conducted in public and that all deliberations made by the Commission must take place in public. He stated that G.L. Chapter 30A, § 21(a)(7) allowed the Commission to move into executive session to comply with or act under the authority of any general law, such as G.L. Chapter 23N, § 6(i) regarding competitively sensitive information submitted in the course of the application process. He stated that if the Commission requested answers pertaining to competitively sensitive information, the applicant could request to move the meeting to executive session.

General Counsel Grossman stated that any finding the Commission makes must be backed by substantial evidence, and that the heightened standard of clear and convincing evidence applied to suitability pursuant to 205 CMR 215.

General Counsel Grossman stated that the factors the Commission would evaluate would be: the applicant's experience and expertise related to sports wagering; the economic impact and benefits to the Commonwealth; the applicant's proposed measures related to responsible gaming; the description of the applicant's willingness to foster racial, ethnic, and gender diversity, equity, and inclusion ("DEI"); the technology the applicant intends to use in operation; the suitability of the applicant and qualifiers; and any other appropriate factor in the Commission's discretion.

General Counsel Grossman stated that the Commission could determine temporary or durable findings of suitability, but that no preliminary finding needed to be entered. He noted that the Commission could use any information received pursuant to G.L. Chapter 23K, G.L. Chapter 128A, G.L. Chapter 128C, or information from other jurisdictions where the operator was

authorized to operate. He stated that conditions could be placed on a license pursuant to 205 CMR 220.

General Counsel Grossman added that the tethered category three sports wagering license did not permit untethered operation. He noted that after a decision was made on the license, a written decision would be prepared and issued to commemorate the Commission's decision. He explained that the operator would require an operations certificate before they could begin sports wagering operations.

[3. Presentation Of Application For Category 3 Sports Wagering Operator License Submitted By WSI US, LLC \(WynnBET\) And/or American Wagering, Inc. \(Caesars Entertainment, Inc\) Including Demonstration Of Technology And User Experience In Accordance With 205 CMR 218.06 \(3\)\(23:03\)](#)

Jeff Hendricks, Caesars' Assistant General Counsel, introduced Eric Hession, Caesars' President of Digital Operations, Ken Fuchs, Caesars' Head of Entertainment, Heather Rapp, Caesars' VP of Social Responsibility, Floyd Baroga, Caesars' VP of Product Compliance, and Nick Arcuri, Caesars' Technology Product Leader.

Mr. Hession stated that Caesars offered sports wagering operations in twenty-seven jurisdictions; with 180 sportsbooks across twenty-two jurisdictions and mobile sports wagering in nineteen jurisdictions. He explained that from 2012 until April 2021, American Wagering Inc. operated under the "William Hill" brand name, and was rebranded as Caesars Sportsbook after the acquisition in April 2021.

Mr. Hession stated that offerings would be limited to what was approved by the Commission, and that Caesars had the technology to restrict any markets that were not approved. He stated that Caesars was a subsidiary of Caesars Entertainment Inc. ("CEI"), and that CEI had \$1 billion in cash, and \$2 billion in availability for revolving credit; for a total of \$3 billion of available liquidity. He stated that Caesars had reduced nationwide spending by focusing more on high-value customers.

Mr. Hession stated that Caesars did not have a finalized marketing plan, but that Caesars typically marketed through television, radio, billboards, social media, affiliate programs, grassroots partnerships with local venues, and league partnerships. He stated that all marketing materials were reviewed to ensure a responsible wagering experience.

Mr. Hession stated that Caesars employees were primarily located in Las Vegas, and that Caesars employed seven full-time remote employees who were Massachusetts residents. He noted that there may be more Massachusetts employees during local activation.

Mr. Hendricks stated that Caesars was committed to responsible wagering. He stated that Caesars sponsored public awareness education and other campaigns relate to problem gambling

and underage gambling. He stated that guests could self-select responsible gaming features on the platform. He stated that Caesars' corporate responsible gaming program applied to all advertising and marketing in the Commonwealth of Massachusetts. He noted that Caesars had responsible gaming ambassadors who received additional training on providing information related to responsible gaming. He stated that Caesars' platform had responsible gaming tools.

Mr. Hendricks stated that the product demonstrations would show how the platform prevents individuals under the age of twenty-one from creating accounts through the KYC process. He stated that Caesars only markets to those over the age of twenty-one. He reported that the company could choose to exclude an individual based upon company discretion if the individual was not using the products appropriately.

Mr. Fuchs stated that Caesars' advertising was customer-centric and treated sports wagering as an additive experience to sports. He stated that Caesars leveraged its knowledge of the local market and customers to ensure that marketing was data driven. He noted that Caesars' rewards program had more than sixty-five million members worldwide. He explained that Caesars had field marketing teams that worked with local vendors to provide a variety of opportunities for customers to learn about the sportsbook. He noted that Caesars had partnerships with the NFL, CBS Sports, and ESPN. He stated that Caesars offered a myriad of sign-up and retention promotions and that promotions were tailored to the players.

Ms. Rapp stated that Caesars focused on the wellbeing of employees, guests, and local communities. She stated that community engagement efforts included civic engagement, strategic philanthropy, and staff volunteering. She stated that Caesars tried to embed diversity, equity, and inclusion ("DEI") in all of its work. She stated that Caesars supported minority-owned business enterprises ("MBE"), women-owned business enterprises ("WBE"), and veteran-owned business enterprises ("VBE") in obtaining relevant certifications.

Ms. Rapp stated that Caesars' goals for diversity were to achieve 50% women leadership and 50% POC leadership by 2025. She stated that as of 2021, Caesars had 46% women in mid-level leadership and 32% women in senior leadership. She stated that as of 2021, Caesars had 43% POC in leadership roles.

Mr. Barroga stated that Caesars platform was live in New Jersey since 2019 and was currently live in eighteen jurisdictions. Mr. Arcuri provided a platform demonstration. Commissioner Skinner asked whether reducing the time limit would take effect immediately. Mr. Arcuri explained that changes to limits take effect immediately if they become stricter.

Chair Judd-Stein asked if the fund withdrawal process was instantaneous. Mr. Arcuri stated that debit cards would be an instant withdrawal of funds, but other methods such as ACH may take more time. Commissioner O'Brien noted that Massachusetts prohibited credit card funding for sports wagering accounts, and that the Commission was discussing banning payment services that are one step removed from credit cards. She asked if there was a mechanism to stop

payments from certain payment services. Mr. Fuchs replied that Caesars had controls in place that could disable payments from credit cards or secondary credit sources.

Commissioner O'Brien noted that she had follow-up questions regarding an incident in Iowa, but that the line of questioning could be saved for the review of the suitability and compliance portion of the application. Chair Judd-Stein asked if any forms of secondary credit were permitted in other jurisdictions that would be excluded in Massachusetts. Mr. Fuchs stated that the player plus card would be changed for Massachusetts to only allow debit card funding. Commissioner Hill asked if there was technology that could identify whether a card was a credit card and not a debit card. Mr. Fuchs stated that the card number would identify it as a credit card, and that the card would be rejected.

Commissioner Hill noted that phone support was listed as only being available for twenty hours per day and stated that he wanted to ensure that citizens who encounter problems would have access to assistance. Mr. Hession stated that the phone lines were shut down between 1 AM and 5 AM pacific time due to low call volume, but that live agents were available via chat 24/7. Commissioner O'Brien asked if the shutdown times coincided with a drop in usage on the east coast. Mr. Hession stated that there was little wagering activity between 4 a.m. and 8 a.m. EST, and that Caesars could review its shutdown time.

Commissioner O'Brien asked if there was a mechanism to suspend activity if a player could not get in touch with live customer support. Mr. Arcuri clarified that Caesars' live chat had agents available 24/7, it was only the voice chat that was twenty hours a day.

Mr. Barroga stated that Caesars platform had been vetted in multiple markets and was compliant with GLI-33. He stated that Caesars contracted Bulletproof to conduct assessments, operational audits, and vulnerability testing.

Mr. Fuchs stated that Caesars worked with LexisNexis for KYC in most jurisdictions and GeoComply in one jurisdiction. He explained that if LexisNexis flagged a new account, the patron could submit a selfie with their identification, which provided a secondary opportunity for customers to be validated. He stated that all withdrawals were processed within an hour or two, and then it was dependent upon the type of transfer being requested.

Mr. Fuchs stated that the trading team was organized by sport, so that Caesars had subject matter expertise across all sports offered. He stated that Caesars handled 200,000 events per year and hundreds of millions of bets. He stated that the team handles odds-making and risk management. He reported that integrity monitoring is done in conjunction with U.S. Integrity. Mr. Hendricks stated that the in-house team applied all anti-money-laundering industry best practices and federal requirements. He concluded his presentation by stating that Caesars was requesting temporary suitability and temporary licensure from the Commission.

4. [Presentations and Analysis Relevant to review and evaluation of Application for Category 3 sports wagering operator license for WSI US, LLC \(WynnBet\) and/or American Wagering, Inc. \(Caesars Entertainment, Inc\)](#) (2:49:47)

a. Technical Components

Chair Judd-Stein provided an initial overview of GLI. Chair Judd-Stein stated that Gaming Laboratories International (“GLI”) was the first company to develop and set gaming technical standards which were now considered an industry benchmark. She stated that GLI continued to innovate standards; and that regulators relied upon these standards to preserve the integrity of the industry. She then introduced GLI’s Vice President of Government Relations and General Counsel Kevin Mullally.

Mr. Mullally stated that GLI was familiar with the platform Caesars had proposed, and that it had been approved in other jurisdictions with similar regulatory requirements. He stated that Caesars’ platform would be subject to additional testing for deployment in Massachusetts. He stated that there would be testing of the platform to global standards and then to local integration.

GLI’s Director of Client Solutions, Joe Bunevith, before the test lab could make submittals, the Commission would need to approve 205 CMR 138, 205 CMR 238, 205 CMR 247, and 205 CMR 248. He stated that after those regulations were approved, the operators would submit the code for their sports wagering system and hardware to GLI for testing.

Mr. Bunevith stated that Caesars would submit their last submission for one or more U.S jurisdictions and then test any changes to the platform to comply with Massachusetts specific rules and regulations. He stated that if a potential operator’s platform was new to GLI it would undergo an architectural review that identifies, and documents critical files related to compliance. He stated that after the initial review was complete the source code could be submitted for testing in a locked-down environment.

Mr. Bunevith stated that the lab would verify changes for Massachusetts specific deployments; and once those changes were validated, a certificate would be issued to the operator. He stated that once the certificate was issued, the Commission could approve the operator to commence operations. He stated that field verification would be finalized in the upcoming weeks and that verification of the production server and verification of critical file signatures would then commence. He added that GLI would also review internal controls and procedures submissions.

Commissioner O’Brien asked if anything from Caesars’ application raised concerns regarding technical capacity of their platform. Mr. Mullally stated that Caesars completed testing on time prior to the stated launch date in each jurisdiction they’ve launched in.

b. [Report on Suitability of the Applicant](#) (2:59:24)

Director of the Investigation and Enforcement Bureau (“IEB”) Loretta Lillios stated that the IEB submitted a report regarding the preliminary suitability of this applicant in connection with their tethered category three license, which was tethered to EBH’s category one sports wagering license. She stated that the IEB performed a review for preliminary suitability according to the standards set forth in 205 CMR 215.01(2). She noted that a full suitability investigation had not been conducted at this time.

Director Lillios stated that the licensing division did a scoping review of the applicant pursuant to G.L. Chapter 23N § 5(b). She stated that the IEB identified one entity and five individuals to designate as qualifiers in connection with the application. She stated that the IEB omitted the parent company of Caesars, CEI, in the list of qualifiers as that entity's application was forthcoming. She stated that CEI was working on an expedited basis to complete the business entity disclosure, and that the IEB relied upon public Securities and Exchange Commission (“SEC”) for its initial financial review.

Director Lillios stated that individual qualifiers associated with the parent company were identified as part of the preliminary review. She stated that the IEB reviewed the submission and found no substantial deficiencies. She stated that the applicant was very responsive with requests related to the application.

Director Lillios stated that the team conducting the review was comprised of contract investigators. She stated that the review for preliminary suitability included a summary of Caesars’ licensing status in other jurisdictions, compliance history in other jurisdictions, and pending litigation valued over \$100,000. She stated that there was an open-source review of the applicant and individual qualifiers, but not of the entity’s qualifiers.

Director Lillios noted that the applicant self-reported a withdrawal of application for a gaming license in Massachusetts in 2013. She stated that the predecessor parent company and some of Caesars executives were qualifiers for that application. She stated that the IEB had performed a full suitability investigation and identified four areas of investigative concern. She explained in 2013, the IEB recommended that the Commission hold an adjudicatory hearing to determine suitability, and Caesars subsequently withdrew its application before the hearing occurred.

Director Lillios stated that for the purposes of this preliminary review, the IEB recognized that 2013 was almost a decade prior, and that Caesars had evolved as a company since then. She stated that Caesars reorganized following bankruptcy proceedings, and that Caesars had also evolved in terms of its leadership.

Director Lillios stated that the applicant self-reported their compliance history including the application withdrawal in Massachusetts, a matter in Virginia, and three recent fines which were included in the IEB’s report. She expressed her expectation that Caesars would continue to be responsive to the IEB’s supplemental request for a more itemized and comprehensive accounting.

Commissioner O'Brien stated that she wanted the Commission to be briefed on the IEB's interactions. She expressed her desire to discuss and inquire the issues flagged by the IEB; and noted her dissatisfaction regarding the lack of detail within the application. Commissioner Skinner agreed with Commissioner O'Brien.

Chair Judd-Stein stated that the Commission might want to consider its options for entering an executive session. She sought clarification as to whether the entity that appeared before the Commission in 2013 was CEI. Director Lillios stated that the entity that applied in 2013 was Caesars Entertainment Corp. ("CEC"), she stated that the company was renamed as a result of reorganization. Mr. Hendricks stated that CEC was now a holding company of the publicly traded parent company and had been renamed Caesars Holding Inc. He noted that Caesars was not involved in the 2013 discussions, and not associated with the company that initially applied in 2013. He stated that CEI acquired CEC in 2020.

Mr. Hendricks stated that there were some technical elements to the Virginia matter that Caesars would prefer to discuss in executive session. He noted that the matter could be discussed at a high level in public, however. Commissioner O'Brien asked if the same could be done for the New York, and Washington D.C. matters. Mr. Hendricks stated that Caesars would prefer to discuss the D.C. and Cherokee matters in an executive session.

Commissioner O'Brien asked if Executive Director Wells could provide any insight into the 2013 matter as she was the former Director of the IEB. Executive Director Wells suggested that the matter occurred nine years prior, and that if the Commission needed specific details, they could refer to the IEB's report. Chair Judd-Stein clarified to the meeting's participants that the IEB's 2013 report was not provided in conjunction with the review of Caesars application.

Mr. Hendricks stated that the application identified two matters related to withdrawal of prior applications. He stated that CEI was not involved with the withdrawal from Massachusetts in 2013, and that CEI did not acquire the 2013 applicant until 2020. Commissioner O'Brien asked if there were overlapping qualifiers. Mr. Hendricks stated that Caesars' President of Digital Business, Mr. Hession, was with CEC at the time, but not in the role he held at the time of today's meeting. He reported that none of the senior management team of CEI were involved in the 2013 application. Commissioner O'Brien noted that she wanted to discuss the issue further in the executive session.

General Counsel Todd Grossman asked if the matters to be discussed in executive session were limited to the 2013 Massachusetts matter, the New York matter from September 2022, the Washington D.C. matter from 2022 and the Cherokee matter from 2022. Commissioner O'Brien noted that the New York and Virginia matters could be discussed to some extent in public. General Counsel Grossman stated that to the extent information was competitively sensitive and would place the applicant at a competitive disadvantage if discussed publicly, an executive session could be held, pursuant to G.L. c. 23N, § 6(i).

Commissioner O'Brien asked if any information in connection with the 2013 application withdrawal would go into the privacy interests of individuals who were not present. General Counsel Grossman stated that such information would also qualify for an executive session. He added that if any information could be discussed in public, the executive session could be stopped, and the Commission could return to the public session of the meeting. He stated that any information the Commission discussed publicly in 2013, would also have to be discussed in public.

Commissioner O'Brien asked if the IEB's 2013 report was released publicly, or if only the IEB's recommendation was released publicly. Executive Director Wells stated that the Commission never deliberated on the report, and that it was never hashed out in public. She stated that she was unsure whether the report was included in the meeting packet.

Commissioner O'Brien noted that there was a Boston Globe article from October 30, 2013, that discussed some of the information included in the IEB report related to the red flags related to Caesars partnership with the Gansevoort Hotel Group. She stated that this indicated some of the information was released publicly in 2013. General Counsel Grossman stated that the broad issues were known to the public, but some of the details may not have been public. Chair Judd-Stein expressed a preference for using an executive session if the Commission could not confirm what information was public.

Mr. Hendricks stated that a redacted version of the 2013 report was publicly available, and suggested that the redacted report be used as the basis of the public discussion. Chair Judd-Stein stated that the Commission needed to decide what amount of weight to assign to the 2013 matter. Commissioner O'Brien stated that the Commission could begin the public discussion of the New York and Virginia matters until a redacted version of the IEB's report was made available to the Commission. Director Lillios stated that she had the IEB report available. Chair Judd-Stein requested that Director Lillios distribute the report to the Commission and Mr. Hendricks.

Mr. Hendricks explained that the withdrawal of an application in Virginia was based upon CEI's pending acquisition of William Hill. He stated that Caesars was completing an application for a brick-and-mortar license while William Hill was simultaneously seeking a mobile license. He stated that CEI spoke with Virginia's regulators and chose to withdraw one of the applications as the companies were being combined. He stated that the license was withdrawn without any finding of unsuitability or concerns regarding Caesars's qualifications. He stated that it was a technical withdrawal based upon the number of licenses available by statute and the pending acquisition.

Mr. Hendricks stated that Caesars had recently settled a disciplinary action in Nevada related to a fact pattern that predominantly predated CEI's acquisition of the subsidiaries involved in the disciplinary action. He stated that Caesars' team worked with Nevada regulators to resolve these matters. He noted that the platform launching in Massachusetts was a different system than the

older system used in Nevada. He noted that Caesars was currently within the regulatory process to deploy its new platform in Nevada.

Mr. Hendricks reported that four counts were settled with the Nevada Gaming Control Board. He stated that one count pertained to duplicate wagers on Caesars' older platform. He stated that Caesars self-reported the matter and put a patch in place to fix the issue. He stated that staff reviewed the impacted transactions and reimbursed guests for any losing wagers. He reported that guests who received the benefit of winning the duplicate wager were able to keep their winnings.

Mr. Hendricks stated that another issue was due to a system flaw in which the duplicate wagers issue was not timely identified. He stated that staff were retrained as to what matters required regulatory reporting. He stated that another count in Nevada was related to adequate customer service not being provided in 2021. He stated that this matter was settled, and that robust customer service measures have been implemented since then. He noted that CEI acquired William Hill in 2021, and immediately began investing resources to improve customer service functions, including chatbots, more staffing, and third-party resources.

Mr. Hendricks stated that the last issue in Nevada was for failing to timely notify the Nevada Gaming Control Board of a suspected theft at a retail location. He stated that the matter occurred at a smaller location in rural Nevada. He stated that the staff was retrained in controls and procedures and that the matter was settled with Nevada regulators.

Commissioner Skinner sought clarification regarding the counts related to failure to timely notify the regulator. Mr. Hendricks stated that there was a failure to timely notify both of the suspected theft and for the duplicate wager issue. He noted that Caesars was unable to identify the root cause of the duplicate wager issue, but that the issue was resolved from the system perspective.

Commissioner Skinner sought clarification regarding the duplicate wager issue. Mr. Hendricks explained that when the system was under high volume certain wagers would be recorded twice. He stated that a patch was put in place to limit bets to ensure that bets could not be placed more quickly than a human could make them. Commissioner Skinner asked if the patrons accounts were deducted twice for a single bet. Mr. Hendricks confirmed that the accounts were deducted twice in some instances.

Commissioner O'Brien asked if more details related to the suspected theft could be discussed in public. Mr. Hendricks stated that he could provide more detail related to that matter in an executive session as it related to Caesars controls and security. Commissioner O'Brien stated that she would like to hear more on this incident in the proper setting.

Chair Judd-Stein stated that the Commission should have a chance to review the 2013 IEB report. She noted that the entity within the 2013 report was not the same entity before the Commission this meeting, and that she wanted to ensure the report was relevant to the discussion

of Caesars application. Executive Director Wells stated that the investigation was conducted by consultants from Spectrum Gaming, and that Spectrum submitted a draft report and recommendation to the IEB. She stated that the report was finalized by the IEB, and that the IEB agreed with Spectrum's recommendation of not issuing a finding of suitability.

Commissioner Skinner stated that she wanted the opportunity to read the IEB's report and confer with the IEB to understand what portions were relevant to the applicant. She requested the opportunity to understand and assess the associated risks. Director Lillios explained that the relevant section of the report was between pages 219 through 250. Commissioner O'Brien agreed with Commissioner Skinner; and requested an opportunity to read the 2013 IEB report.

Transcriber's Note: The Commission took a brief break to read the 2013 IEB report and reconvened at [4:29:25](#).

Commissioner O'Brien stated that one aspect of the report that jumped out to her was the lack of compliance. She asked that Caesars' representatives provide more detail regarding their compliance structure. Mr. Hendricks stated that almost all of the individuals listed in the 2013 IEB report were no longer with - or were never with CEI. He stated that CEI now had a completely different compliance committee.

Mr. Hendricks noted that the second issue listed in the report was related to a qualifier who was no longer with the company. He stated that the third issue was related to allegations of improper accommodations for high value players. He noted that Caesars did not currently offer these types of incentives for high value players and did not anticipate offering these incentives in the future. He stated that the senior management team responsible for the 2013 decisions was not affiliated with CEI.

Mr. Hendricks stated that the Compliance Committee included several individuals, and that the Chairman, Bud Hicks, was an independent member with a long history as a Nevada gaming regulatory attorney. He noted that two board members served on the compliance committee. Mr. Hendricks stated that he served as the Compliance Officer as designated by the Gaming Compliance Plan, and that he reported directly to the Compliance Committee. He stated that the Gaming Compliance Plan used currently was distinct from the 2013 plan. He stated that the matters were now reviewed by different senior management with a new Gaming Compliance Plan.

Commissioner O'Brien requested further detail regarding the terms of those appointed to the Compliance Committee. Mr. Hendricks stated that the two members of the Boards of Directors were on the Compliance Committee commensurate with their term on the Board of Directors. He stated that each year the Board of Directors reviewed appointments to each committee and made appointments to the committees. He stated that the Chairman was elected on an ongoing basis. He explained that executive officers could be appointed or removed pursuant to the terms of the Gaming Compliance Plan.

Commissioner O'Brien asked if there was a separate nominating committee or if the Board of Directors nominated for the committees. Mr. Hendricks stated that the Gaming Compliance Plan had terms regarding who could be appointed. He stated that in terms of corporate governance Caesars had a separate Nominating Governance Committee that makes recommendations to the Board.

Commissioner Skinner asked how Mr. Hession was involved in the 2013 incident. Mr. Hendricks stated that Mr. Hession was listed as a qualifier during the 2013 process, but that he was not involved in the issues raised by the IEB. Commissioner Skinner asked what the terms of the Nevada settlement were. Mr. Hendricks reported that the settlement had a fine of \$100,000 and that there were no ongoing conditions other than the continued remediation methods.

Chair Judd-Stein noted that the current applicant and parent company were not involved with the individuals cited in the Boston Globe article. Mr. Hendricks stated that Caesars has no association with the individuals who negotiated that transaction. Chair Judd-Stein asked when the Commission would anticipate receiving the application from Caesars' parent company. Director Lillios stated that CEI's licensing team had been responsive, and that the IEB expected to receive the application by Friday or Monday.

c. [Financial and Economic Impact Analysis](#) (4:42:37)

Theresa Merlino, Partner from RSM US LLP's ("RSM") National Gaming and Hospitality Practice, stated that RSM reviewed sections of the application related to finance. She stated that all information was received on or before November 21, 2022. She stated that the information presented would be based on preliminary research and subject to change if new information became available. She noted that much of the financial information submitted by the applicant was marked confidential, and that RSM was willing to discuss those topics further in executive session.

Ms. Merlino stated that the preliminary market study showed that neighboring states would see decreased play when Massachusetts' market went live. She reported that New Jersey's market shrank 7.3% when New York legalized sports wagering. She stated that given sports wagering's online nature and various platforms, it was difficult to predict the marketplace in emerging markets.

Ms. Merlino stated that RSM provided a report on the applicant's self-disclosed financial information based upon projections and data from other jurisdictions. She noted that RSM was only provided information on the publicly traded parent company, and pre-transaction entity, William Hill. She stated that the one year of financial transactions provided made it difficult to understand financial patterns over time. She stated that the market share estimate was based upon the five years of projected handle provided by Caesars.

Ms. Merlino stated that the revenue projections might warrant an executive session. She stated that estimates place Massachusetts' sports wagering market as between 300 and 350 million. She stated that Caesars' presentation indicated methodology and thought behind their acquisition model, but that Caesars did not share how that translated to revenue projections in its application.

Ms. Merlino stated that Caesars had provided their market share percentages in other jurisdictions. She noted that the application listed this information as confidential, but that the calculations were based on public data. She stated that the estimates could be reviewed in executive session. She stated that Caesars' market share estimates were in the middle of their range of market shares in other jurisdictions.

Ms. Merlino reported that revenue projections were only provided for one year. She noted that there was an unknown ramp-up period to terminal market size, and that RSM was unable to evaluate Caesars' build out assumptions based upon the data provided. She stated that the Commission might want to confirm Caesars' assumptions related to market share.

Ms. Merlino noted that Caesars' planned relationship with EBH was not detailed in its application. She stated that this relationship might affect market share or marketing efforts. She noted that Caesars' revenue projections were based on its performance in other jurisdictions, and that the projections might be conservative when compared to newer markets.

RSM's strategic Finance Practice Leader Jeff Katz explained that CEI was well capitalized based upon its recent SEC filings. He stated that CEI had \$3 billion in available liquidity, with \$944 million in cash on hand and \$2.1 billion in availability under its revolving credit facility. He noted that CEI had no major debt maturities coming up in the next twelve months. He stated that CEI had generated \$704 million in cash flow from its operations in the nine months ending September 30, 2022. He stated that CEI had reduced its total debt by \$2.6 billion in that nine-month period. He stated that CEI had the financial resources to fund operations in Massachusetts.

Chair Judd-Stein asked if RSM would be available for an executive session. Ms. Merlino stated that she and other RSM employees would be available.

5. Review and evaluation of Application for Category 3 sports wagering operator license submitted by WSI US, LLC (WynnBet) and/or American Wagering, Inc. (Caesars Entertainment, Inc) in accordance with 205 CMR 218.00 including, but not limited to consideration of the following criteria (4:59:48)

a. Experience and Expertise related to Sports Wagering (205 CMR 218.06(5)(a))

Commissioner Skinner asked what the partnership with EBH would entail. Mr. Hession stated that EBH was providing access to use their tethered licensure in Massachusetts, and that Caesars would provide annual payments in addition to payments based upon performance in Massachusetts. He stated that CEI and Wynn had similar agreements in other jurisdictions. He

noted that under the agreement, Caesars would have obligations to report to the Commission and comply with all reporting requirements.

Chair Judd-Stein asked if Caesars would assume control of any marketing materials created by third-party marketing affiliates. Mr. Hession stated that Caesars would monitor affiliates, and anticipated using affiliates to the extent they were allowed in Massachusetts. Chair Judd-Stein asked if Caesars would have control over the content. Mr. Hendricks stated that all third-party marketing affiliates abide by Caesars' marketing code and guidelines. Chair Judd-Stein stated that she would like to discuss the projected revenues in application section B3 in an executive session.

Commissioner Maynard inquired what the term "selfie sign-up" meant. Mr. Fuchs explained that it was a secondary KYC method where patrons could upload a picture of themselves with the front and back of their driver's license. Commissioner Maynard asked if this KYC function was performed in-house. Mr. Fuchs stated that Caesars used a third-party vendor for selfie sign-ups.

The Commission reached a consensus that Caesars had met the Commission's expectations in regard to this section of the application. Commissioner Skinner noted that her expectations were met, with the caveat that the Commission would hear additional information from RSM in the executive session.

[b. Economic impact and other benefits to the Commonwealth if applicant is awarded a license \(205 CMR 218.06\(5\)\(b\)\) \(5:08:43\)](#)

Commissioner O'Brien asked if there were no anticipated jobs being created in the Commonwealth. Mr. Hession stated that Caesars was exploring the option of local activations that would add in-market employees to facilitate signups. He noted that Caesars allowed its tech team to work remotely, and that some of those employees were located in Massachusetts.

Commissioner Maynard stated that the Commission anticipated that all licensees would collaborate with the state lottery to mitigate any affects sports wagering operations would have on the lottery. He noted that the applicant's answer, however, left a bit to be desired. Mr. Hendricks confirmed that Caesars was happy to collaborate with any state agencies and would be willing to supplement the information in the application. Chair Judd-Stein noted that there were cross-marketing opportunities.

Commissioner O'Brien expressed concerns about the responsible gaming implications of using an eighteen-wheeler for marketing. Chair Judd-Stein agreed and requested information about the truck's itinerary. Mr. Hession stated that the truck was used to highlight the brand and assist with enrollment. He stated that the truck had staff that checked identification before engaging with individuals. He stated that the truck showcase was most recently used in Maryland, and was anticipated to be used in Cleveland for the launch of sports wagering in Ohio.

Mr. Hession stated that the results had not been great, and that Caesars was unsure of whether they would use the truck in Massachusetts. Commissioner O'Brien stated that while checking identification was appreciated, it would be difficult to prevent those under twenty-one from viewing the truck. Chair Judd-Stein agreed.

Chair Judd-Stein stated that Caesars had the opportunity to make intentional partnerships in terms of DEI with its branding ambassadors in Massachusetts. Mr. Hendricks stated that Caesars would take this into consideration.

Commissioner O'Brien noted that Caesars had claimed to be developing a relationship with the Massachusetts Military Support Foundation, and asked what step Caesars was at in developing that relationship. Mr. Hendricks stated that Caesars was contemplating financial support and identifying leaders to determine how to support the initiative. He reported that it was early in the relationship, but that it would continue to develop.

Commissioner Hill commented that he was impressed with Caesars' community involvement in other jurisdictions. Ms. Rapp stated that Caesars had a variety of community involvement at the local and national levels. She stated that Caesars was partnered with a variety of organizations within Caesars' strategic impact areas.

The Commission reached a consensus that Caesars had met the Commission's expectations in regard to this section of the application.

c. Applicant's Willingness To Foster Racial, Ethnic, And Gender Diversity, Equity, And Inclusion (205 CMR 218.06(5)(d)) (5:23:41)

Commissioner Skinner stated that Caesars' diversity spending with MBE and WBE was commendable. She noted that data from VBE spending was missing, however. She asked if Caesars had the breakdown of spending by category for MBE and WBE. Ms. Rapp stated that Caesars did not report the information broken down publicly. She noted that total diverse spending was 9.5%. Commissioner Skinner stated that she was interested as to why this information wasn't reported publicly.

Ms. Rapp stated that Caesars' goals for vendor diversity were to source quality goods and services, benefit communities where Caesars operated, and engage small and diverse local businesses. She stated that Caesars did not tie a metric to these goals, but that Caesars worked to get these businesses certified. Commissioner Skinner asked how success was measured then. Ms. Rapp stated that it was measured by year-over-year increases. She noted that Caesars also tracked spending at business enterprises owned by the disabled population, and LGBTQ owned businesses as well. She stated that Caesars partnered with chambers of commerce to support those businesses.

Commissioner Maynard commended the applicant on the data provided. Commissioner Skinner expressed appreciation for Caesars' commitments to increasing senior leadership roles for women and POC. She asked what targeted efforts Caesars used to increase those numbers. Ms. Rapp stated that Caesars employs diverse recruitment strategies, inclusive language in all job postings, candidate outreach and partnerships, inclusion of historically black colleges in outreach, conscious inclusion training for hiring managers, and partners with DEI organizations to ensure a more diverse candidate slate. Commissioner Skinner stated that this was a comprehensive plan and that she hoped it yielded the results Caesars anticipated.

The Commission reached a consensus that Caesars had met the Commission's expectations in regard to this section of the application.

d. [Proposed Measures Related To Responsible Gaming \(205 CMR 218.06\(5\)\(C\)\)](#)
(5:35:04)

Commissioner O'Brien noted that the application did not mention implementation of GameSense. She stated that the responses in this section seemed insufficient. She noted that Caesars had its own responsible marketing code that differed from the American Gaming Association's ("AGA") responsible marketing code. She stated that there was a marked difference in regard to marketing sports wagering at colleges and universities.

Mr. Hendricks stated that Caesars would adhere to all regulatory requirements applicable to responsible gaming and apologized for the omission of the implementation of GameSense. He stated that supplemental materials would be provided to reflect this. He stated that Caesars marketing code differed from the AGA's, but that Caesars aspired to adhere to the spirit of the AGA's responsible marketing code.

Mr. Hession stated that Caesars had sponsorship agreements with Michigan State and LSU. He stated that these schools had large alumni networks that were sports fans. He stated that this trial was to determine if relationships with university alumni associations would drive sign ups. He stated that the agreements with the schools included clauses that advertising would only be distributed to alumni over the age of twenty-one, and that the audience of the stadiums had a high percentage of patrons over the age of twenty-one. Mr. Hendricks stated that Caesars applied additional controls to these advertisements, requiring that the marketing be confined to the arenas and not elsewhere on campus.

Commissioner O'Brien noted that there was a picture in the article where the eighteen-wheeler was located in a tailgating area. She noted that a prior applicant rebuffed all requests from universities. She expressed concern that this engagement would affect vulnerable persons up to the age of twenty-five, who were susceptible to addiction and the negative consequences of gambling. She stated that the AGA standards pointedly did not allow advertising on college campuses. She sought clarification regarding the rationale as to how this marketing would comport with responsible gaming.

Mr. Hendricks stated that the distinction was that advertising was tailored to areas where the average age was in excess of the legal age to wager. He stated that controls were designed to restrict marketing to those under twenty-one. He stated that the partnerships with universities were done on a limited basis and that there were no plans to engage in these relationships in the Commonwealth or elsewhere. Commissioner O'Brien asked if Caesars was going to continue the affiliations with Michigan State and LSU. Mr. Hendricks stated that Caesars would not pursue additional agreements, but that he would prefer to discuss the existing agreements in the executive session.

Commissioner O'Brien asked if the eighteen-wheeler was in an age-gated area in the photo from Michigan State. Mr. Hession confirmed that identification was checked in order to enter the truck area. Commissioner O'Brien asked if the truck was visible outside of the area where identification was checked. Mr. Hession confirmed that was correct. Commissioner O'Brien stated that Caesars standard was that a crowd in marketing areas was 70% over the legal age for sports wagering, while the AGA required 73.6%. She expressed an interest in knowing the age demographic of the crowd at these events. Mr. Hendricks confirmed that Caesars would provide that information in an executive session.

Chair Judd-Stein asked if Caesars would comply with all responsible gaming regulations and cooperate with the Commission's Director of Responsible Gaming, Mark Vander Linden. Mr. Hendricks stated that Caesars would comply with all regulations and work with all Massachusetts stakeholders in designing its responsible gaming program.

Commissioner Hill noted that he had attended many college events, and typically half of the audience was a student section. He asked how the audience would be more than 70% above the age of twenty-one. Mr. Hendricks stated that when drafting the agreement, Caesars had received assurances of the stadium demographic and then validated it. He stated that additional context could be provided in the executive session.

Commissioner O'Brien asked if responsible gaming messaging was provided at these universities. Mr. Hendricks stated that Caesars put responsible gaming messaging on all of its marketing. Commissioner O'Brien asked if mental health and additional support services were provided. Mr. Hendricks stated that Caesars directed individuals to statewide resources.

Commissioner Maynard noted that in states without professional sports, there were different demographics. He expressed that he viewed college sports audiences as being predominantly over the age of twenty-one. He noted that he still had concerns, however, about where Caesars was being promoted, but he believed the crowd could meet the "70% must be twenty-one or over requirement."

Chair Judd-Stein noted that Caesars required audiences to be over 70% above the legal sports wagering age. She noted that she had seen 85% used elsewhere and the AGA used 73.6%. She

noted that Massachusetts had yet to adopt this rule related to marketing, and that this was something to consider. She asked if Caesars had language related to a commitment not to promote excessive gambling. Mr. Hendricks stated that part of Caesars' marketing code was that the advertisements don't encourage, depict, or condone excessive or irresponsible activities.

Commissioner O'Brien stated that the application referenced in multiple questions that additional information was available upon request. She stated that the application was the request where that information should have been provided. She stated that she wanted a more substantive response related to disciplinary action in other jurisdictions. She stated that this was needed for both the suitability and responsible gaming sections of the application.

Mr. Hendricks stated that Caesars had applied a fine threshold of fines over \$50,000, and that the information related to fines under \$50,000 would be provided to the Commission. Commissioner O'Brien stated that there was not a threshold limit in the application. Director Lillios stated that there was a threshold in the litigation question that was \$50,000.

Mr. Bunevith stated that if an issue arose post-launch, that GLI could provide technical and forensic investigations. Chair Judd-Stein asked if some of the issues that may arise may be outside of the technical scope. Mr. Hendricks stated that issues could arise either based upon technical errors or procedures not being followed. Chair Judd-Stein asked if Caesars had any violations related to responsible gaming. Mr. Hendricks stated that he would want to confirm that information before speaking on it in the public meeting.

The Commission reached a consensus that more information was required and that until the information was presented to the Commission the applicant had not met the requirements of this section of the application.

e. [Technology that the Applicant Intends to Use \(205 CMR 218.06\(5\)\(e\)\)](#) (6:15:13)

Commissioner O'Brien asked where Caesars helpline was located, and if it had the capacity for other languages. Mr. Hession stated that the call center was located in Nevada, and that thirty employees resided in New Jersey. He stated that the help line was only offered in English, and that Caesars was considering having the helpline also offered in Spanish.

Chair Judd-Stein stated that the Director of Responsible Gaming might be able to provide additional insight regarding the limit setting feature. She reiterated her request that Caesars work with the Responsible Gaming Division.

The Commission reached a consensus that Caesars had met the Commission's expectations in regard to this section of the application.

f. [Suitability of the Applicant and its Qualifiers \(205 CMR 218.06\(5\)\(f\)\)](#) (6:19:16)

Commissioner O'Brien noted that the Commission had required supplemental information from Caesars and information regarding the entity qualifier from the IEB. Chair Judd-Stein stated that there were also questions related to financial suitability that she hoped to address in the executive session. Commissioner O'Brien stated that the Commission could not say whether or not its expectations were met until supplemental information was provided. Commissioner Skinner and Commissioner Maynard agreed with Commissioner O'Brien's assessment.

6. [Executive Session](#) (6:22:06)

Chair Judd-Stein asked which topics the Commission wanted to discuss in executive session. Commissioner Skinner stated that the Commission had requested further detail regarding the Washington D.C. and North Carolina, Cherokee matters. Mr. Hendricks stated that the manner in which those matters were remediated was a trade secret that would put Caesars at a competitive disadvantage.

General Counsel Grossman stated that there were questions related to player acquisition that included competitively sensitive information. Ms. Merlino stated that this information was relevant to market share analysis. General Counsel Grossman stated that any publicly accessible information could not be discussed in the executive session. Ms. Merlino stated that the data Caesars used was public information, but the calculations may not be public.

General Counsel Grossman stated that information was requested related to the calculations of college stadium demographics. He stated that information was also requested about the marketing relationships with the colleges. He stated that these topics were competitively sensitive information suitable for an executive session.

Commissioner Skinner requested Caesars diversity spending breakdown that was not publicly disclosed. Chair Judd-Stein stated that. Chair Judd-Stein stated that projected revenues had to be discussed due to the limited information available. Ms. Merlino stated that in order to share observations as they compared to what was in the application, RSM would have to discuss information Caesars marked as confidential. General Counsel Grossman noted that each of these topics was competitively sensitive information that could be discussed in the executive session.

Chair Judd-Stein stated that the Commission anticipated that it would meet in executive session in conjunction with its review of the American Wagering, Inc. (d/b/a Caesars Entertainment, Inc.) application in accordance with G.L. c. 30A, § 21(a)(7) and G.L. c. 23N, § 6(i) to consider information submitted by the applicant in the course of its application for an operator license that is a trade secret, competitively-sensitive or proprietary and which if disclosed publicly would place the applicant at a competitive disadvantage and/or G. L. c. 4, § 7(26)(c) (the privacy exemption) to consider information submitted in the application materials related to named individuals, the disclosure of which may constitute an unwarranted invasion of personal privacy, and/or G. L. c. 4, § 7(26)(n) (certain records for which the public disclosure is likely to jeopardize public safety or cyber security) to consider information submitted in the application

materials related to the security or safety of persons or buildings, structures, facilities, utilities, transportation, cyber security or other infrastructure located within the commonwealth, the disclosure of which is likely to jeopardize public safety or cyber security. Chair Judd-Stein stated that the public session of the Commission meeting will reconvene at the conclusion of the executive session.

Commissioner O'Brien moved that the Commission enter into executive session for the reasons just stated by the Chair. The motion was seconded by Commissioner Maynard.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

Transcriber's Note: The public meeting of the Commission reconvened at [8:11:56](#).

7. [American Wagering, Inc. \(Caesars Entertainment, Inc\) license application determination by the Commission in accordance with 205 CMR 218.07](#) (8:13:08)

Chair Judd-Stein stated that this agenda item provided the opportunity for the Commission to consider a license determination. She stated that while supplemental information had been requested, that it could be included as a condition on licensure rather than waiting to hold a vote until the information is received. The Commission reached a consensus to hold the vote until supplemental information was received from Caesars and the IEB.

Director Lillios sought clarification as to whether additional information was needed other than the application from Caesars' parent company and the fulsome list of disciplinary action against Caesars. Commissioner O'Brien confirmed this was all the information the Commission requested. Director Lillios stated that licensing would do a deficiency review for the entity qualifier's application.

Chair Judd-Stein asked what particular information regarding disciplinary actions Caesars should provide. Director Lillios stated that a supplemental communication was sent to Caesars indicating what was required. Commissioner O'Brien stated that the Commission needed the missing piece related to entity qualifiers and the list of disciplinary actions in order to determine whether Caesars had met the Commission's expectations. Commissioner Skinner stated that the Commission still needed to finish the discussion about diversity spend.

Chair Judd-Stein stated that the Commission did not anticipate meeting on Caesars application again until January 4, 2022. Mr. Hendricks stated that Caesars would provide supplemental

responses as quickly as possible. The Commission thanked Caesars' representatives for their time.

8. [Other Business](#) (8:36:57)

Hearing no other business, Chair Judd-Stein requested a motion to adjourn.

Commissioner Skinner oved to adjourn. The motion was seconded by Commissioner O'Brien.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated December 9, 2022



TO: Interim Chair Jordan Maynard
Commissioner Brad Hill
Commissioner Eileen O'Brien
Commissioner Nakisha Skinner

FROM: Dean Serpa, Executive Director

DATE: July 11, 2024

RE: Vacancy, Chief Enforcement Counsel/Assistant Director of the IEB
Pending Vacancy, Division Director, Sports Wagering Division

BACKGROUND

The Agency is currently working to fill two senior positions, the Chief Enforcement Counsel/Assistant Director of the Investigations and Enforcement Bureau (IEB) and the Division Director, Sports Wagering Division.

The current Chief Enforcement Counsel/Assistant Director of the Investigations and Enforcement Bureau (IEB) has been filled in an interim capacity since 12-22-2023.

The current Division Director, Sports Wagering Division has informed the Executive Director of their intent to depart the position on or before October 1, 2024.

Both the Chief Enforcement Counsel/Assistant Director of the Investigations and Enforcement Bureau (IEB) and the Division Director, Sports Wagering Division positions are identified by the Agency as being a “*major policymaking position*” and therefore subject to Agency Human Resources Policy 1.03.01 – Hiring Authority.

HUMAN RESOURCES POLICY 1.03.01 Background:

Agency HR policy 1.03.01 – Hiring Authority was adopted by the Commission on January 22, 2022.

The policy states “if there is a vacancy in a position that has been designated as a major policymaking position, or other reason why a need arises to fill such a position, the Commission shall determine its level of involvement in the hiring process.



Massachusetts Gaming Commission

HUMAN RESOURCES POLICY 1.03.01 Background, Continued:

Such involvement may include, but not be limited to, a) the Chair's designation of one or two commissioners to participate in the hiring process, b) notification and/or review of the job posting, c) implementation of notification requirements at key points of the hiring process, d) and/or delegation of the hiring process to the executive director under any conditions set by the Commission."

Today's discussion is to determine to what extent the Commission chooses to "determine its level of involvement" as allowed by policy for both the Chief Enforcement Counsel/Assistant Director of the Investigations and Enforcement Bureau (IEB) and the Division Director, Sports Wagering Division positions.

Attached please find the full HR Policy 1.03.01- Hiring Authority, a full list of current Agency positions subject to HR 1.03.01, and the current job description for each position/vacancy under consideration.

END



1.03.01 Hiring Authority

Introduction

This policy relative to hiring authority is intended to be read in conjunction with section 1.03: *Hiring* of the Commission's Human Resources Policy Manual and intended to clarify the authority of the Executive Director to make certain hiring decisions. This policy shall also be read in harmony with the statutory hiring provisions contained in G.L. c. 23K, and not interpreted so as to create a conflict therewith. To the extent any conflict does arise, the relevant statutory provision shall govern.

Statutory authority

The hiring authority granted the Commission, and the executive director is described in G.L. c. 23K, § 3 and § 4. The following provisions relate to hiring authority:

- “The commission shall have all powers necessary or convenient to carry out and effectuate its purposes, including but not limited to, the power to appoint officers and hire employees.” G.L. c. 23K, § 4(1)
- “The commission shall appoint an executive director. The executive director shall serve at the pleasure of the commission” G.L. c. 23K, § 3(i).
- “The executive director shall appoint and employ a chief financial and accounting officer and may, *subject to the approval of the commission*, employ other employees, consultants, agents and advisors, including legal counsel,” G.L. c. 23K, § 3(i) (emphasis added).
- “The executive director may, from time to time and *subject to the approval of the commission*, establish within the commission such administrative units as may be necessary for the efficient and economical administration of the commission and, when necessary for such purpose, may abolish any such administrative unit or may merge any 2 or more units.” G.L. c. 23K, § 3(j) (emphasis added).
- “The executive director may appoint such persons as the executive director shall consider necessary to perform the functions of the commission;” G.L. c. 23K, § 3(k).



Massachusetts Gaming Commission

Human Resources HR Policy 1.03.01 Continued:

Policy Statement

The Commission recognizes its authority to appoint officers and hire employees under Section 4 of Chapter 23K to carry out and effectuate its purposes. However, the Commission seeks to achieve efficiencies and grant the executive director proper authority to best advance the interests and operations of the Massachusetts Gaming Commission (the “MGC”).

Process

According to Section 3, the Commission has exclusive authority to appoint the executive director. Similarly, according to Section 3, the executive director has the exclusive authority to appoint the chief financial and accounting officer (“CFAO”). The employment of every other employee, consultant, agent, and advisor of the Commission is subject to the approval of the Commission. To create operational efficiencies, the Commission grants the executive director, subject to the conditions herein, the authority to appoint all MGC employees without such Commission approval, except those employees designated as holding a “*major policymaking position.*”

The term ‘major policymaking position’ is defined in G.L. c. 268B, § 1 as: the executive or administrative head of a governmental body, all members of the judiciary, any person whose salary equals or exceeds that of a state employee classified in step 1 of job group XXV of the general salary schedule contained in section 46 of chapter 30 and who reports directly to said executive or administrative head, the head of each division, bureau or other major administrative unit within such governmental body and persons exercising similar authority.

If there is a vacancy in a position that has been designated as a major policymaking position, or other reason why a need arises to fill such a position, the Commission shall determine its level of involvement in the hiring process. Such involvement may include, but not be limited to, the Chair’s designation of one or two commissioners to participate in the hiring process, notification and/or review of the job posting, implementation of notification requirements at key points of the hiring process, and/or delegation of the hiring process to the executive director under any conditions set by the Commission.

All employees, consultants, agents, and advisors of the Commission, other than the executive director and CFAO, who are not designated as holding a major policymaking position may be appointed at the sole discretion of the executive director that is consistent with MGC policies and regulations and all applicable law and the approved number of available positions determined by the Commission through the annual budget process or a supplemental public meeting.

Nothing in this policy waives the Commission’s authority to be involved in any particular hiring process, should it so choose.



Massachusetts Gaming Commission



Massachusetts Gaming Commission

Positions identified as holding a “major policymaking position” subject to HR Policy 01.03.01:
[As of 07-01-2024]

Chief Enforcement Counsel
Chief Information Officer
Chief Legal Counsel
Chief of the Gaming Agents Division
Chief People and Diversity Officer
Director of Racing
Director, Investigations and Enforcement Bureau
Director, Research and Responsible Gaming
Division Chief, Communications
Division Chief, Community Affairs
Division Chief, IEB Financial Investigations
Division Chief, Licensing Division
Division Chief, Sports Wagering Division
Executive Director

MGC Position that file Statement of Financial Interest (SFI) [holding a major policymaking position] not subject to HR 01.03.01 due to statutory exemption:

Chief Finance and Accounting Officer



Massachusetts Gaming Commission

Massachusetts Gaming Commission

Job Title: Chief Enforcement Counsel/Assistant Director of the IEB

MGC Position Grade 7

Posting Salary Range: \$119,656.00 to \$167,565.00

The Massachusetts Gaming Commission seeks to hire a **Chief Enforcement Counsel / Assistant Director of the Investigations and Enforcement Bureau (IEB)**. Under the direction of the Director of the IEB, this position manages the background investigations performed for suitability and licensure purposes, the administrative hearing and review process involving applicants who seek review of the IEB's decisions on licensing matters, and the adverse action process involving casino non-compliance matters. The Chief Enforcement Counsel also serves as Assistant Director of the IEB and assists the Director with the Bureau's day-to-day operations.

Duties and Responsibilities

- Prepare notices of violation and enforcement actions to address significant or repeated casino non-compliance with legal requirements or internal controls. The adverse actions may be formal and informal non-compliance notices and the issuance of civil administrative penalties. Work with casino management towards the informal disposition of adverse actions through agreed settlements in appropriate circumstances.
- Work collaboratively with the Commission's Legal Division to promulgate regulations and procedures.
- Assist with identifying risk areas to the IEB – and mitigation to address such areas - in the licensing, registration, and adverse action process.
- Ensure that investigative protocols comport with the Commission's statutory and regulatory suitability criteria and policy directives.
- Review, analyze, and update department policies and procedures continuously and make recommendations for improvement as needed.

Skills and Qualifications

- Experience leading a diverse team and superior mentorship skills
- Applied knowledge of standards of ethics
- Solid legal analysis and writing skills, including experience interpreting and applying regulations
- Experience or demonstrated ability in making oral presentations in a public forum
- Attention to detail and ability to multiple priorities with competing deadlines

Experience, Education, and Training

- J.D. Degree from an accredited law school, a license to practice law in Massachusetts, and a minimum of 10 years as a practicing attorney with a minimum of four years of experience in a leadership capacity.
- Experience in investigations, including the ability to understand the suitability investigatory process for individual and entity applicants for licensure or registration.
- Experience in handling reviews under a state administrative procedures act or in appellate practice.

Salary is commensurate with experience.

The successful candidate will be required to pass an extensive background check that includes a full credit check, CORI, drug screen, and fingerprinting.

END

Massachusetts Gaming Commission

Job Title: Division Chief, Sports Wagering

MGC Position Grade 7

Posting Salary Range: \$129,419.57 to \$155,328.77

The Massachusetts Gaming Commission (“Commission”) is seeking a highly qualified and experienced individual to lead its sports wagering operations as **Division Chief, Sports Wagering Division**.

Under the direction of the Executive Director, the Division Chief, Sports Wagering is responsible for oversight and management of all aspects of the regulation of sports wagering, including retail and digital operations, and all administrative functions associated with the management of a division within the Commission.

This position is responsible for leading the sports wagering division within the Commission which is charged with the regulatory oversight of sports wagering activities in the state, ensuring integrity, compliance with legal and regulatory requirements, and the protection of consumers.

In addition, the **Division Chief, Sports Wagering Division** will be expected to maintain a thorough and current knowledge of trends and issues related to sports betting and ensure that staff in the division and throughout the agency receive appropriate training.

Key Responsibilities:

1. Regulatory Oversight:

- Develop, update, and implement regulations and policies for sports wagering in compliance with state laws and the Commission policy directives and guidelines.
- Monitor compliance with regulatory standards by licensed operators.
- Participate in the licensing process for sports wagering operators and associated individuals and entities, as necessary, to ensure thorough vetting and compliance.
- Coordinate with the Investigations and Enforcement Bureau (“IEB”) regarding the enforcement of sports wagering regulations.
- Report regularly to the Commission and Executive Director on sports wagering operations.

2. Operational Management:

- Manage the Sports Wagering Division within the Commission.
- Supervise and lead a team of professionals in regulatory, compliance, and investigative roles.
- Collaborate with other Commission divisions and external agencies to ensure cohesive regulatory practices.
- Abide by Commission D.E.I. recruitment policies in the hiring and development of diverse staff members.

3. Policy Development:

- Collaborate with the Commission and stakeholders to shape and update sports wagering policies.
- Stay informed about national and international sports wagering trends and best practices.
- Provide expert advice on the potential impacts of proposed regulations and legislation.
- Collaborate with key stakeholders including Commissioners, the Legal and Licensing departments, and others, on drafting, interpreting and implementing regulations on sports wagering.

4. Consumer Protection:

- Develop and enforce measures to protect consumers from fraudulent activities and ensure fair play.
- Work with Research and Responsible Gaming Division to promote responsible gambling initiatives and support programs to mitigate problem gambling and promote responsible gaming.

5. Stakeholder Engagement:

- Serve as the primary liaison between the Commission and sports wagering operators, industry associations, like gaming jurisdictions, and other stakeholders.
- Represent the Commission at industry conferences, public hearings, and other relevant events.
- Facilitate communication and collaboration among stakeholders to address industry challenges and opportunities, as well as patron inquiries and complaints.
- Serve as primary point of contact for licensees on topics related to sports wagering and paid fantasy sports.

6. Financial Oversight:

- Collaborate with finance division, as necessary, to ensure the timely collection and reporting of sports wagering revenue and ensure accurate financial accounting.
- Monitor market performance and report on economic impacts of sports wagering in Massachusetts.
- Manage the division's budget and allocate resources efficiently.

Skills and Qualifications:

- Strong leadership and organizational skills.
- Excellent communications and customer service skills, including the ability to partner with stakeholders to identify and resolve problems.
- Proven track record demonstrating the ability to develop and implement policies and procedures based on a sound understanding of complex regulations.
- Comprehensive knowledge of sports wagering operations, regulations, and compliance requirements.
- Bachelor's degree and at least 5-10 years of experience in public administration, public policy, gaming, sports wagering, law, or a related field, or an equivalent combination of education and experience [advanced degree preferred].
- At least 5 years of leadership or supervisory experience preferred.
- One (1) to three years (3) of regulatory sports wagering compliance and/or regulatory operations experience preferred.
- Commitment to ethical standards and integrity in professional conduct.
- Commitment to public service, positive office culture, collaboration, and attention to detail are essential.

Salary is commensurate with experience.

The successful candidate will be required to pass an extensive background check that includes a full credit check, CORI, drug screen, and fingerprinting.

END



COMMUNITY MITIGATION FUND

TO: Interim Chair Jordan Maynard and Commissioners Eileen O'Brien, Bradford Hill and Nakisha Skinner

FROM: Joseph Delaney, Mary Thurlow and Lily Wallace

CC: Dean Serpa, Executive Director, Todd Grossman, General Counsel

DATE: June 21, 2024

RE: Everett – ShotSpotter Request

The City of Everett's FY 2025 Public Safety Application included a request by the Everett Police Department for expansion of the ShotSpotter system to include the Lower Broadway area. This area is one of the last remaining areas in Everett that is not covered by this system. According to the City, they have been using this system for approximately 10 years and it covers 80-85% of the community. The CMF Review Team was aware of the ShotSpotter system and the fact that it was used by many communities across the United States, including Everett. At the time of its review, the Review Team did not investigate the efficacy of the system since it had already been in use by the City.

At the June 6 2024 meeting, the Commission expressed concern over current controversies relative to using ShotSpotter. There have been allegations that the implementation of the system may violate the civil rights of individuals and targets communities of color. The Commission also expressed an interest in understanding the technology behind this system to ascertain the usefulness of this system.

An internet search revealed that several lawsuits had been filed regarding ShotSpotter including:

- In 2022 a class action lawsuit had been filed against the City of Chicago's use of ShotSpotter;
- In 2022 a lawsuit was filed against Detroit's expansion of the ShotSpotter system; and
- In 2021, ShotSpotter filed a \$300 million defamation suit against Vice Media.

Several large cities have discontinued their use of ShotSpotter including Chicago, IL, Atlanta, GA, San Antonio, TX, and San Diego, CA. According to various articles on-line, these cancellations may have to do with civil rights issues, questions about the effectiveness of the system and/or operational costs. Locally, both Somerville and Boston are re-evaluating their use of the system. It does not appear that either community has made a decision regarding the continued use of the system. Senators Markey and Warren have requested that the Department of Homeland Security investigate the use of the ShotSpotter system.

According to the manufacturer, the ShotSpotter system is a way to track gun shots in real time. Information is sent directly to the police department which enables a quicker response time to the shots being fired. Enclosed with this memo is the proposal for the expansion of the ShotSpotter system in Everett, which provides more detail on how the ShotSpotter system works. Also attached is a video supplied by the manufacturer.



COMMUNITY MITIGATION FUND

On Tuesday, June 11, 2024 members of the Review Team met with Chief Strong and Captain Landry from the Everett Police Department to discuss the use of ShotSpotter. The impression of the officers about ShotSpotter was that it works well as a public safety device. Their reasoning is that once the ShotSpotter sends a message, it is relayed by dispatch to the police who then send assistance to the area. The police are finding that officers are often dispatched before people in the area can react and call the police. Victims can get medical assistance quicker and the police can send cars to the area sooner. Everett has not been subject to any complaints or lawsuits about the ShotSpotter that they are aware of.

Chief Strong and Captain Landry have been invited to the Commission meeting on July 11, 2024 to answer any questions the Commission may have regarding Everett's experience with the system.



SafetySmart™
PLATFORM



ShotSpotter®

**Price Proposal to Expand Subscription-Based
Gunshot Detection, Location, and Forensic Analysis Service
for the City of Everett, Massachusetts
February 5, 2024
Proposal ID: EVERETTMA020524**

Submitted by:

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SOUNDTHINKING™, INC.

for greater public safety™

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Executive Summary

Introduction

SoundThinking™ (formerly known as ShotSpotter) is pleased to provide this proposal for expanded gunshot detection, location, and forensic analysis services per the City's request. SoundThinking is honored to have served the City of Everett in its gun violence reduction efforts since July 2014, and we are pleased to present the following proposal for an expansion of 0.32 square miles, bringing the City's total coverage to 1.6 square miles. While the original coverage area was deemed the most critical at the time of the original deployment, there are additional areas of the City that will benefit from ShotSpotter® coverage. SoundThinking has collaborated with the Everett Police Department to identify those areas that will benefit most from expanded coverage.

The ShotSpotter gunshot detection, alert, and analysis services provide what would be otherwise unobtainable, critical real-time gunfire intelligence. The core capabilities of the ShotSpotter solution are:

DETECT – ShotSpotter detects and locates gunfire incidents to enable a fast, precise response to over 90% of shooting incidents within the targeted areas. This has a powerful deterrent effect and disrupts the gun violence cycle.

PROTECT – ShotSpotter alerts allow first responders to respond swiftly to find victims and save lives. Cities with ShotSpotter report a 3.5 minute reduction in transport time for gunshot victims. In addition, ShotSpotter helps protect officers by providing them with comprehensive data on the actual amount of gunfire activity that occurs in the neighborhoods they patrol and provides critical situational awareness when responding to specific incidents.

CONNECT – By applying community policing-oriented best practices, ShotSpotter provides a unique opportunity for law enforcement agencies to connect with vulnerable communities. Rapid response to gunfire incidents in communities that have been most impacted by gun violence builds positive attitudes towards law enforcement and leads to more constructive engagements and cooperation.

ShotSpotter has become an indispensable crime-fighting tool for these agencies. In light of the community dynamics that fuel gun violence and the well-documented challenges of relying solely on 9-1-1 calls for assistance, SoundThinking's ShotSpotter technology is critical in providing support to the community and addressing the following issues:

- **Under-reporting of persistent gunfire:** Nationwide, on average, less than 20% of gunfire incidents are reported to 9-1-1. Why don't residents call? The answer is complex, but typically involves the following concerns:
 - Recognition: "Was that gunfire, fireworks, or something else?"
 - Retaliation: "If they find out I called, will they come after me?"
 - Resignation: "No one came the last time I called..."

Without ShotSpotter, most law enforcement agencies are working with an 80% to 90% deficiency in their gun violence-related intelligence.

- **Late and inaccurate information:** When a citizen reports a gunfire incident, the 9-1-1 call typically comes several minutes after the event occurred, and based on analysis, the

location provided is usually mislocated by 750 feet (on average). As a result, valuable time and resources are wasted trying to locate the incident, diminishing the opportunity to identify suspects and witnesses, recover evidence, and most importantly, render life-saving aid to victims.

The ability to receive near real-time gunfire intelligence data provides law enforcement agencies with a critical advantage in their efforts to reduce and prevent gun violence and improve officer safety. Specific results include:

- Officers can more quickly and accurately go directly to the scene of the shooting
- Situational awareness is vastly improved over what is available when relying solely on the 9-1-1 system
- Law enforcement has a better chance of arriving before the shooter has left the scene
- Officers are more likely to find evidence in the form of shell casings (which, in conjunction with NIBIN/IBIS, provide valuable investigative leads) and/or other ground truth that can aid in the investigation
- Officers are more likely to find witnesses who may have information that can aid in the investigation
- Community engagement is heightened, which often translates into more information from the community (e.g., tip lines, field interviews, etc.)
- Enhanced targeted enforcement (precision policing)
- More court-admissible and scientifically sound forensic evidence is available to strengthen prosecutions of the worst offenders

We look forward to working with the City of Everett to extend the benefits of ShotSpotter to this new coverage area as you expand your efforts to reduce gun violence in your community.

SoundThinking's SafetySmart Platform



The SafetySmart platform brings together specialized software and objective data to help law enforcement and civic leadership better protect their communities by ensuring the right resources are provided when and where they are needed most. As a trusted partner to many law enforcement agencies, SoundThinking has been both a firsthand witness and participant in the evolution of policing as it faces increasing challenges, such as staffing shortages, aging technologies, and exponential growth in data (as well as the need to access, analyze, and share data). In response to these challenges, SoundThinking has developed our SafetySmart platform that provides a range of tools beyond gunshot detection to help law enforcement agencies operate and collaborate more efficiently.

SafetySmart Platform

Better Information • Better Decisions • Better Outcomes

 ShotSpotter Gunshot Detection <ul style="list-style-type: none"> • Real-time alerts for rapid, precise response to save lives • Increase evidence recovery and NIBIN leads • Enhance gun violence prevention/intervention with Data for Good 	 CaseBuilder Digital Case Management <ul style="list-style-type: none"> • One-stop digital case folder houses all data and workflows • Analytical and collaboration tools accelerate and improve solvability • More efficient and effective case handling 	 CaseBuilder Crime Gun Gun Crime Management <ul style="list-style-type: none"> • Centralized collaboration on gun crime activities including Respond alerts and NIBIN leads • Prioritize and track leads and tasks • Operational insights on case outcomes for stakeholder feedback
 CrimeTracer Investigative Lead Generation <ul style="list-style-type: none"> • Accelerate investigations with largest database of local and regional crime data in single portal • Advanced link analysis detects relationships between people, places, and things 	 ResourceRouter Community-First Patrol Management <ul style="list-style-type: none"> • Data-driven deployment of patrol resources for more effective crime deterrence • Drive accountability into officer activity • Reduce over-policing and bias in patrols 	 SafePointe Weapons Detection <ul style="list-style-type: none"> • AI-driven weapons detection allows high throughput without disruption • Unmanned screening at a lower overall cost of ownership • Passive concealed sensors for better screening experiences

The SafetySmart platform brings the power of digital transformation to law enforcement. Together or separately, these data-driven solutions act as a force multiplier and help drive deeper community engagement by delivering better information, enabling better decisions, and driving better outcomes, for more efficient, effective, and equitable policing.

How ShotSpotter Works

Based on an analysis of known gunfire-related crimes, the SoundThinking team designs and deploys networked sensors within the targeted coverage area. These acoustic arrays detect and locate gunshot activity within the coverage area and report that information to SoundThinking's Incident Review Center (IRC) which is staffed 24/7/365. ShotSpotter uses a two-factor incident review process to minimize false alerts. The first tier is performed by sophisticated AI software, to filter out any incidents that do not meet the minimum threshold for human review as potential gunfire incidents (e.g., helicopter noise, fireworks, etc.). The incidents that meet the minimum threshold for human review are then received at our IRC. The IRC review process is performed by a team of highly trained acoustic experts. In addition to examining the incident audio, SoundThinking's acoustic experts also examine the visual characteristics of the detected pulses and the incident, such as the number of participating sensors, the wave form, pulse alignment, and the direction of sound. The IRC review results in either publishing (Gunshot or Probable Gunshot) or dismissal (Non-Gunshot) of the incident with a high level of precision.

If the reviewer classifies the incident as a gunshot, the reviewer sends an alert, including location information and an audio snippet, to law enforcement agencies via a password-protected application on a mobile phone, in-car laptop, or computer. In addition to the dot-on-the-map and audio, ShotSpotter provides details such as number of shots fired, whether multiple shooters were involved, and whether high-capacity and/or fully automatic weapons were used. SoundThinking designed this entire process (i.e., recording the impulsive sound, two-factor review, and publishing alerts to authorized users) to be completed in less than 60 seconds (but is often completed within 25 to 30 seconds).

ShotSpotter customers receive a contextually rich, detailed gunfire alert that enables a fast, precise, and safer response to gunfire incidents. In addition, ShotSpotter alerts can also trigger other technology platforms such as cameras that can pan and zoom in the direction of an event. SoundThinking has successfully interfaced ShotSpotter with a wide range of third-party applications such as CAD, RMS, License Plate Readers, drones, and other applications.

ShotSpotter helps law enforcement agencies by directing resources to the precise location of more than 90% of gunfire incidents. ShotSpotter rapidly notifies first responders of shootings via dispatch centers, in-vehicle computers, and smart phones. Instant alerts enable first responders to aid victims, collect evidence, and identify witnesses. ShotSpotter's actionable intelligence can then be used to prevent future crimes by positioning law enforcement when and where crime is likely to occur. ShotSpotter gunshot detection and location services are delivered as an easily implemented Software as a Service (SaaS) solution, with no requirement for customer investment in or maintenance of expensive hardware or software. SoundThinking hosts, secures, monitors, and maintains the ShotSpotter infrastructure. Contracts are based on an affordable one-year or multi-year subscription agreement, and the subscription includes unlimited licenses for the proposed SoundThinking applications.

Proposed Coverage Area Expansion

ShotSpotter is deployed to provide coverage for a specified area, bounded by a specific coverage area perimeter. SoundThinking will design the coverage area based upon the Department's requirements and based upon analysis of historical crime data. The area delineated by a blue boundary in the image below is the City's current ShotSpotter coverage area. The area delineated by a red boundary in the image below is a rough estimate of the proposed expanded coverage area based on the Department's specifications; please note, the final coverage area may vary. SoundThinking will collaborate with Department stakeholders to determine the final coverage boundaries and any resulting adjustments to the proposal to address the Department's needs and priorities.

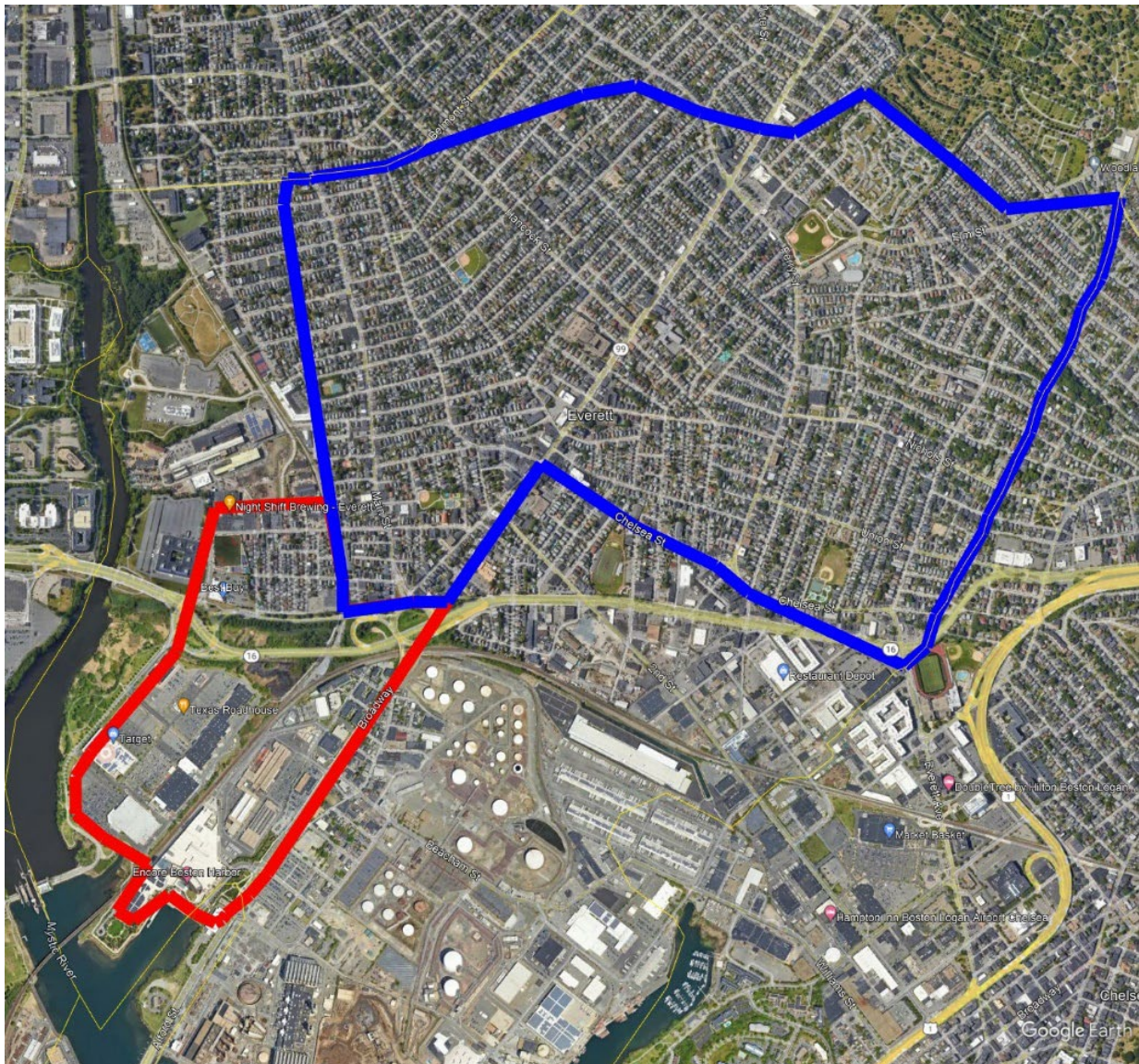


Figure 1. Proposed Expanded ShotSpotter Coverage Area = 0.32 square miles

Pricing

0.32 mi² Coverage Area: One-Year Term

Description	Annual Fees
ShotSpotter Annual Subscription Fee	\$24,000
Annual Fee Subtotal	\$24,000
Description	One-Time Fees
One-Time Service Initiation Fee	\$3,200
One-Time Fee Subtotal	\$3,200
Total	\$27,200

*The current annual ShotSpotter subscription fee is \$75,000 per square mile.

Forensic Consultation Services

Forensic Consultation Service Fee (Expert Witness Services) \$350/hour

Expert Witness Testimony Services are available upon request and billed separately at the above rate.

Payment Terms

Payment for the service initiation and subscription shall be as follows:

One-Year Payment Terms

- 50% of fees due upon execution of agreement \$13,600
- 50% of fees due upon ShotSpotter service activation (live) status \$13,600

Expert Witness Testimony Services are available upon request and billed separately at the above rate.

General Pricing Assumptions

This pricing is submitted based on the following assumptions:

- The services will be delivered under the terms of the existing Contract with the Metro Boston Homeland Security Region #000000000000000000057738 dated February 2, 2023, as subsequently amended, or a new contract, at MBHSR's discretion.
- This pricing does not include any state or local taxes; if taxes are applicable, we will be happy to provide an amended quote upon request.
- This proposal and all pricing contained herein remains valid for ninety (90) days from the date of this proposal.

ShotSpotter Pricing Assumptions

This pricing is submitted based on the following assumptions:

- This pricing includes standard ShotSpotter Service Initiation fee for the expansion, but no onboarding services are proposed. SoundThinking assumes that the customer will perform any required onboarding services.
- The Department will provision network access to meet SoundThinking minimum specifications and requirements for all computers (PCs and MDCs) that will access the ShotSpotter service.



Sports Wagering Division

7. **Golf:** Revision for settlement clarification.
8. **Soccer:** Correction of wording.
9. **Olympics:** Addition of rules to address upcoming Summer Olympic Games.
10. **Table Tennis:** Revision for settlement clarification.
11. **Volleyball:** Revision for settlement clarification.
12. **Beach Volleyball:** Addition of rules to address upcoming Summer Olympic Games.
13. **Water Polo:** Addition of rules to address upcoming Summer Olympic Games.
14. **Winter Olympics:** Revision for settlement clarification.

CONCLUDING STATEMENT:

The Sports Wagering Division confirms all requirements have been met under 205 CMR 247.02 and has no reservations approving these changes.



Revised Submission Date: June 25, 2024

FBG Enterprises Opco, LLC (“Fanatics Sportsbook”) is seeking approval for updates to its Sportsbook House Rules to reflect clarification and additional product offerings. Fanatics Sportsbook has noted all material changes made to these rules by section below to include a short description for each change.

Types of Wagers Accepted

1. Additional clarification on Round Robin wagers.

Abandoned, Canceled, Postponed, or Forfeited Events

1. Revision to clarify an event must start within 48 hours of a cancellation rather than conclude.

Dead Heat Settlement

1. Addition of the Dead Heat calculation.
2. Clarification on Dead Heat settlement in parlay wagers.

Football

Result of Xth/Current/Next Drive

1. Deletion of section that is separately addressed in the Football Lightning Bet Markets.

Result of Current Drive / Anytime Touchdown Scorer & Player To Score X+ Touchdowns / Passing Props (Yards, Completions, Attempts, Interceptions Thrown, Passing Touchdowns) / Rushing & Receiving Props (Yards, Completions, Rush Attempts, Receptions, Rushing Touchdowns, Receiving Touchdowns, Scrimmage/Rushing & Receiving Yards) / Xth Player Drafted (Overall, Position, College, NCAA Conference)

1. Revisions for settlement clarification.

Defensive Player Props (Tackles/Assists, Sacks, Interceptions, Forced Fumbles) / Most Passing, Rushing or Receiving Yards in a game (by an individual player)

1. Addition to clarify the types of markets offered.

Basketball

First Field Goal/Rebound/Assist/Three Made (Rules are inclusive of any other Player statistic category not here listed) / Most Points/Rebounds/Assists/Threes Made (Rules are inclusive of any other Player statistic category not here listed) / Top Points Scorer / Player Markets

1. Revisions for settlement clarification.

Daily Player Props - Player Most Points/Rebounds/Assists/3 Point Shots Made/Any Player to Score X Points / Daily Team Props - Largest Scoring Run by Either Team/Team Total Threes Made

1. Addition of new market types.

Baseball

General Baseball Rules / General Player Prop Rules / Total Bases/Hits/Stolen Bases/RBIs/Runs/Singles/Doubles/Triples/Home Runs / Player to Record a Save / Plate Appearance Exact Result/Plate Appearance Inning X Exact Result / Plate Appearance (Reach Base)/Plate Appearance - Inning X - Reach Base / Plate Appearance (Pitch Count)/Pitcher X - Pitches Thrown against Player X - Inning X / Daily Cross Match Player Props/Team Specials

1. Revisions for settlement clarification.

Daily Strikeout Leader / First Pitcher to Record a Strikeout / Each Pitcher to Record 1+ Strikeouts in the 1st Inning / Perfect Start / Pitcher to Strike Out the Side in the 1st Inning

1. Addition of rules to address market type

Ice Hockey

Total Goals & Total Team Goals (Including 1st/2nd/3rd Period Total Goals) / Total Goals Odd/Even (Including 1st/2nd/3rd Period Specific Markets)

1. Revisions for settlement clarification.

60 minute markets (Double Result)

1. Addition of rules to address market type

General Player Prop Rules

1. Addition of rules to detail how we plan to settle NHL player prop markets in the event of an in-game injury.

Tennis

General Tennis Rules

1. Revisions for settlement clarification.

Golf

2-Ball/3-Ball Matchups

1. Revisions for settlement clarification.

Soccer

Odd or Even Corners

1. Correction to wording.

Olympics

General Olympic Rules / Olympics Settlement Rules / Country Golds/Country Medals / Most Gold Medals / Most Medals / Specific Olympic Sport Rules / Olympic Basketball / Olympic Field Hockey

1. Addition of rules to address upcoming Summer Olympic Games.

Table Tennis

General Table Tennis Rules

1. Revisions for settlement clarification.

Volleyball

General Volleyball Rules / Volleyball Market Rules

1. Revisions for settlement clarification.

Beach Volleyball

General Beach Volleyball Rules / Beach Volleyball Market Rules

1. Addition of rules to address upcoming Summer Olympic Games.



Water Polo

General Water Polo Rules / Beach Volleyball Market Rules

1. Addition of rules to address upcoming Summer Olympic Games.

Winter Olympics

General Winter Sport Rules

1. Revisions for settlement clarification.

Rules for Fanatics Sportsbook

General Betting Rules

Types of Wagers Accepted

- Round-Robin Parlay Betting
 - A Round-Robin parlay allows the customer to place a series of wagers on two or more selections, from a greater amount of overall selections. For example, a customer could place three parlays covering two selections from an overall group of three selections. If two or more of these selections win then the customer would have at least one winning bet.
Round Robin wagers cannot include selections from the same event. If selections from the same event are incorrectly wagered upon in a round robin, Fanatics Sportsbook may settle the wager as if only one of the selections from the event are included.

Abandoned, Canceled, Postponed or Forfeited Events

These rules should be referred to in the absence of a Sport-specific ruling. Where such ruling exists it shall take precedence over the rules laid out in this section of the rulebook.

- In the event that a single fixture within a tournament, a one off event, race or similar meeting is abandoned, canceled, postponed or forfeited, bets will be made void unless the event is scheduled to reach a conclusion start within 48 hours of the cancellation. In the instance of events which are abandoned, canceled or forfeited after play has commenced, markets that have been determined in full will be settled as per usual rules. For example, If a baseball match is abandoned with the score at 5-4 after 5 innings, bets placed on Over/Under 8.5 runs would be settled in full given the market had already reached a definitive result. Bets placed on Over/Under 9.5 runs would be settled as void given the lack of a definitive result.

Dead Heat Settlement

- Where a market has concluded and there are more winners than were expected given the market name and terms, where no tie break exists to determine a sole winner, bets will be settled as 'dead heat' with stakes divided by the number of winners.
- Dead Heat Calculation is as follows: (Original Stake * (Number of Expected Winners / Number of Actual Winners)) * Original Odds.

- For example, if a customer places a \$10 stake at odds of +1500 (16.0) on the futures market 'Passing Touchdowns Leader' and their chosen selection finishes in a three way tie, the stake would be divided by the number of winners (three in this instance) and settled accordingly. The customer would receive a return of \$53.33 on the bet (\$3.33 at odds of +1500).
- If one or more legs of a parlay is affected by a "Dead-Heat" then the original parlay stake is reduced accordingly. For example, if one leg of a three-leg parlay is affected by a dead heat with four players tied for one place, the original parlay stake would be divided by four and the returns calculated using the original parlay odds.

Sport-Specific Rules

Football

Football Market Rules

Result of Xth/Current/Next Drive

A multi-way market offering the options of how the drive will end for the offensive team at the start of the drive.

All current drive markets are resulted on the listed drive. Kickoff returned touchdowns and fumbled kickoffs are considered to be drives. If the first half ends with a kickoff only, this will not be considered a drive. Results are graded as follows:

- **Field Goal Attempt** occurs when the offensive team attempts a field goal on the listed drive.
- **Offensive Touchdown** occurs when the offensive team scores a touchdown on the listed drive.
- **Punt** occurs when the offensive team punts the ball to end the listed drive. This includes an attempted punt that is blocked.
- **Other** occurs when any other result (interception, fumble recovered by defense, turnover on downs, defense or special teams touchdown, safety). If a team remains in possession as the clock expires at the end of the 2nd or 4th quarter, or the end of an overtime period, then the market will be made void.

Result of Current Drive

All current drive markets are resulted on the listed drive. Wagers on drive which are not completed at the end of either half will be void. Any drive which does not result in a Touchdown, Field Goal Attempt, Turnover (interception, fumble, or downs), punt or safety is deemed incomplete. Kickoff return ~~TDs~~touchdowns and fumbled kickoffs recovered by the kicking team (muffed kicks), are considered to be drives. ~~if~~If the ~~1st~~first half ends with a kickoff only, this will not be considered a drive. Results are graded as follows:

- Field Goal Attempt occurs when the offensive team attempts a field goal on the listed drive.
- Offensive Touchdown occurs when the offensive team scores a touchdown on the listed drive.
- Punt occurs when the offensive team punts the ball to end the listed drive. This includes an attempted punt that is blocked.
- Other occurs with-when any other result (interception, fumble recovered by defense, turnover on downs, defense or special teams ~~TD~~touchdown, or safety).
Drives which are not completed at the end of either half will be voided.

Anytime Touchdown Scorer & Player To Score X+ Touchdowns

Markets that offer the chance to bet on the chosen player to score a touchdown or multiple touchdowns subject to the criteria specified in the market name.

- In touchdown scorer markets, the player who is considered to possess the ball when the ball is initially on, above, or behind the plane of the opponents' goal line as determined by the on-field officiating crew (and subsequent replay reviews) will be considered the winning selection. For example, if a passing touchdown is scored, the receiver of the ball will be considered the winner, the player completing the pass will not be settled as a winner.
- This market can be offered specifically for specified quarters/halves i.e. '1st Quarter Anytime Touchdown Scorer.' This will be outlined in the market name.

Defensive Player Props (Tackles/Assists, Sacks, Interceptions, Forced Fumbles)

A ~~2-way~~ market offering the customer the chance to bet on both the chosen player to record under or over the specified total of defensive actions and which player will successfully record an action.

- Markets will be settled according to the official game book, or the official competition stats offered by the organizing body.
- For 2-way markets where a whole point number is used as the specified total the outcome will be considered a push and the market voided when the final stat line finishes exactly as the offered total. For example if a customer were to bet on 'Player X Over 4.0 Tackles/Assists' and the player was deemed to have recorded 4 tackles then the market would be considered a push.
- Individual Sacks can be awarded in increments of 0.5 if shared between multiple players. Therefore it is possible for a push to occur even if a half point line was offered. For example if a customer were to bet on 'Player X Over 1.5 Sacks' and the player was deemed to have recorded 1.5 Sacks then the market would be considered a push.
- Only tackles made on defense will count towards tackles/assists markets. Special teams tackles will not be counted.
- For markets such as 'Which player will make a sack' – a player must record 1 or more sacks for the selection to be a winner. Any player finishing the match with 0.5 sacks would be settled as a losing selection in this market.

Passing Props (Yards, Completions, Attempts, Interceptions Thrown, Passing Touchdowns)

A 2-way market offering the chance to bet on the chosen player to record under or over the specified total of passing actions in the specified timeframe.

- Markets will be settled according to the official game book, or the official competition stats offered by the organizing body.

Rushing & Receiving Props (Yards, Completions, Rush Attempts, Receptions, Rushing Touchdowns, Receiving Touchdowns, Scrimmage/Rushing & Receiving Yards)

A 2-way market offering the chance to bet on the chosen player to record under or over the specified total of rushing, receiving or combined actions in the specified timeframe.

- Markets will be settled according to the official game book, or the official competition stats offered by the organizing body.
- Scrimmage/Rushing & Receiving Yards will be settled by combining the sum of the rushing and receiving yardage of the nominated player. Negative yardage will also be applied here, for example if a player has 76 receiving yards and -2

rushing yards their total Scrimmage/Rushing & Receiving Yards will be settled as 74.

- In NCAA Football sacks are credited to the quarterback as negative rushing yards. These negative yards will count towards player rushing props.

Most Passing, Rushing or Receiving Yards in a game (by an individual player)

Multi-player markets offering the opportunity to bet on a selected player to achieve the most passing, rushing, or receiving yards in an individual game or as a head-to-head market against another player. These are all-in markets where a listed player must lead in these statistical categories.

- This can be offered as a head-to-head market i.e. Most Passing Yards market offering Team A QB vs. Team B QB as selections.
- In the absence of an "Any Other/Any Other Player" selection, all selections will be graded as a loss.

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NFL Draft Market Rules

Xth Player Drafted (Overall, Position, College, NCAA Conference)

A market that allows betting on the draft position of a player when pitted against a list of others, based on the criteria specified in the market name.

- Positions are determined by listings on the NFL draft website.
- If the player selected was not offered for wagering, then all players will be settled as void.
- College is determined by the last college team that the player was a member of before the draft.

Basketball

Basketball Player Market Rules

First Field Goal/Rebound/Assist/Three Made (Rules are inclusive of any other Player statistic category not here listed)

A market offering the chance to select from a list of players which one will be the first to achieve the stated statistic.

- ~~All wagers are action, if a non-listed player scores the first field goal in the specified game, then all listed selections will be settled as a Loss.~~
- ~~Listed players who do not enter the court before a winner is established will be made void.~~
- ~~If a player who is not named in the list is deemed the winner of the market then bets will be made void.~~
- Free throws do not count as Field Goals

Most Points/Rebounds/Assists/Threes Made (Rules are inclusive of any other Player statistic category not here listed)

A market offering the chance to select from a list of players which one will achieve the highest total of the stated statistic.

- Any listed player who plays at least 1 second of game time will be considered to have action.
- ~~All wagers are action, if a non-listed player scores the first field goal in the specified game, then all listed selections will be settled as a Loss.~~
- ~~If a player who is not named in the list is deemed the winner of the market then bets will be made void.~~
- Dead Heat rules apply where two or more players are tied for the lead in a statistical category.

Top Points Scorer

A market offering the chance to bet on the highest points scorer in a specific match.

- In the event of a tie in this market (2 or more players), all selections tied with the most points will be settled ~~as winners~~ per the dead heat rule.
- A player must play at least 1 second of game time to be considered to have action. If the player does not play, bets will be void.

Daily Player Props - Player Most Points/Rebounds/Assists/3 Point Shots Made/Any Player to Score X Points

A variety of special player prop markets offered on events to occur across the daily slate, or specified group within the day, of games within a specified competition.

- In the case of a tie, dead heat rules will apply for settlement.

- 90% or more of all games scheduled for that date must be completed for bets to stand.
- Should a player listed not take part in the game, all bets on the player selected will be void, otherwise all bets are action.
- If a non-listed player scores the first field goal in the specified game then all listed selections within that market will be settled as a loss.

Daily Team Props- Largest Scoring Run by Either Team/ Team Total Threes Made

- 90% or more of all games scheduled for the specified date must be completed for bets to stand
- In the case of a tie, dead heat rules will apply for settlement.

Baseball

General Baseball Rules

- In competitions where a 'Mercy Rule' is used, the result at the time of the rule enforcement will be referenced as the final score of the game and used for settlement in accordance with the below listed rules. For example, the
 - 4.○ The team that wins via Mercy Rule, will be settled as a winner in the Moneyline market.
 - Any markets where a winning selection cannot be determined (such as innings winners for any innings that aren't completed) will be made void.
 - All other markets (included but not limited to) Run Line and Total Runs will be made void if not already determined.

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Baseball Player Market Rules

General Player Prop Rules

- A batter starts the game and records at least one plate appearance, then leaves the game with an injury for any reason before the start of their second plate appearance.

Total Bases/Hits/Stolen Bases/RBIs/Runs/Singles/Doubles/Triples/Home Runs

- Walks, hit-by-pitches, reached on errors, and fielder's choices do not count as a total bases.

Batter Plate Appearance Betting

Plate Appearance Exact Result/Plate Appearance Inning X Exact ResultPlayer To Hit A Single/Double/Triple/Home Run

The in-play batter markets offer the customer the opportunity to bet on which type of hit the batter will record in their next/current ~~at bat~~plate appearance. Markets may be offered in a 2-way format (e.g To Hit Single with 'Yes' and 'No' options) or a multiway format with all listed options.

Plate Appearance (Reach Base)/Plate Appearance – Inning X – Reach BasePlayer to Reach Base

A 2-way market offering the customer the opportunity bet if the listed player will reach base at a given ~~at bat~~plate appearance. Results are graded as follows:

Plate Appearance (Pitch Count)/Pitcher X – Pitches Thrown against Player X – Inning XNumber of Pitches Thrown in Next At Bat

A 2-way market offering the customer the opportunity to bet on the number of pitches thrown in ~~next at bat~~the next plate appearance. Markets are resulted on the listed ~~at bat~~plate appearance and graded as follows:

Daily Cross Match Player Props/Team Specials

A variety of special markets offered on events to occur across the daily slate of games within a specified competition. These may include (but are not limited to) player prop parlays across multiple games, or combined totals of runs, wins etc by various combinations of named teams, games, and/or players.

- The market name or market notes will specify the number of, or a list of, all games applicable to the Daily Special markets. If the specified number of games are not completed (at least 8.5 innings played) then any special market depending on action from all games (e.g., 'Each game to have 6+ runs' or '50+ combined runs across all games') will be voided, unless the market outcome has already been determined.
- The number of games (or a list of the relevant games) applicable to the Daily specials will be mentioned in the market name or market notes. If this number of games does not take place then any special market which depends on action

~~from all games (e.g. 'Each game to have 6+ runs' or '50+ combined runs across all games') will be made void.~~

- Where markets are offered such as 'Highest scoring game' or 'Lowest scoring game' dead heat rules will apply.
- For player specific markets, if any player named in the bet does not start the entire selection will be made void.
- Where markets such as 'Team to score most runs' and 'Highest scoring game' are offered, which are dependent on action from each of the day's games, all scheduled games must be played and go at least 8.5 innings for bets to have action, unless the winning team in the offered special took part in an official shortened game and all other games went at least 8.5 innings. Teams involved in double headers will generally be excluded from these specials, but where offered they will be added to market ~~notes with any specific ruling also noted~~name or notes.
- Where markets are ~~offered asking~~offering betting on whether a certain event such as a perfect game, no hitter, player to hit for the cycle etc will occur – 90% or more of all scheduled games must be played ~~and go~~(defined as at least 8.5 innings played) for bets to have action.
- For markets on specific events such as, but not limited to, perfect game, no-hitter, or player hitting for the cycle, 90% or more of all scheduled games must be played (defined as at least 8.5 innings played).

Daily Strikeout Leader

A market offering customers the opportunity to wager on which listed pitcher has the most strikeouts in any given day's slate of games Any listed pitcher who does not start will be voided. In the case of ties, wagers will be graded per the Dead Heat Rule.

First Pitcher to Record a Strikeout

A 2-way market offering customers the opportunity to wager on which starting pitcher will record the first strikeouts of the game.

- If one of the listed starting pitchers does not start the game, all selection will be voided.
- If neither of the listed starting pitchers records a strikeout, and the first strikeout is recorded by a relief pitcher, all selections will be voided.

Each Pitcher to Record 1+ Strikeouts in the 1st Inning

A 2-way yes/no market offering customers the opportunity to bet on each specified

pitcher to throw 1, or more, strikeouts per inning across specified matches. Any listed pitcher who does not start will be voided.

Perfect Start

A game-by-game market where you can bet on a pitcher to only face 3 batters in their first inning.

Pitcher to Strike Out the Side in the 1st Inning

A game-by-game market where you can bet on a pitcher to record 3+ strikeouts in the first inning.

Ice Hockey

Ice Hockey Market Rules

Total Goals & Total Team Goals (Including 1st/2nd/3rd Period Total Goals)

A total goals bet provides an opportunity to bet on whether the number of goals scored in the game or by a team (within a stated time period) will be less than or greater than the number ~~offered~~specified. Bets on ~~the outcome of the whole~~full game selections within this market are inclusive of overtime and will include the goal added to the team winning a shoot-out, where it is to happen.; ~~bets~~Bets placed on the 3rd period ~~are exclusive of~~do not include overtime.

Total Goals Odd/Even (Including 1st/2nd/3rd Period Specific Markets)

A 2-way market offering customers the chance to bet on whether the final number of goals scored in the game will be odd or even. Goals scored in overtime will be included in this market and the resulted total will include the goal added to the team winning a shoot-out, where it is to happen.

~~A 2-way market offering customers the chance to bet on whether the final number of goals scored in the game will be odd or even. Goals scored in overtime, or the goal added to the winning team in the shootout will be excluded in this market unless stated in the market name.~~

60 minute markets (Double Result)

- Where indicated 60 minute markets exclude overtime and shootout goals. If the game goes to overtime, the "tie" selection will be the winner.

Ice Hockey Player Market Rules

General Player Prop Rules

The exception to the above rule is in NHL Regular Season, Play-Offs and Stanley Cup Final events exclusively, where Fanatics Sportsbook will consider any selections made on Match Player Props void if the selected player is active for the game but leaves the game with injury during the 1st Period, without returning to the game. Any selections that have already been unequivocally determined will be settled as such – for example, a player to score a goal and they have already achieved this. Wagers placed on the under option will be settled as winners in the case of a player having less than a specified total of any Match Player Prop before leaving the field in the 1st Period. In this same example, selections on the over option will be settled as void.

Tennis

General Tennis Rules

- ~~● In any of the following circumstances, all bets on an individual match will have action:
 - ~~○ A change of venue to another venue with the same playing surface. Playing surfaces will be defined as Clay, Grass and Hard Court. No further distinction will be made.
 - ~~■ Bets will be made void where the match is moved to a venue with a different playing surface.~~~~
 - ~~○ A change from indoor court to outdoor court or vice versa.~~
 - ~~○ A change of schedule or weather delay which affects the time or date of the match.~~
 - ~~○ Suspensions carrying play over to the following day as long as the play is resumed, and the match is completed.~~~~

Golf

Golf Stroke Play Market Rules

2-Ball/3-Ball Matchups

A 2-way or 3-way market allows betting on which of the named golfers will shoot the best score in the next full upcoming round of golf.

- Bets will be void if one of the players does not tee off on the first of the specified holes. If a player withdraws during the specified group of holes, bets on that player will be settled as losers.

Soccer

Soccer Market Rules

Odd or Even Corners

A 2-way market offering the customer the chance to bet on whether the total number of goals will be an 'Odd' number or an 'Even' number.

- A total of zero will be classed as an even number of goalscorners.

Olympics

General Olympics Rules

- The final medal table declared by the governing body (The International Olympic Committee) will be used to settle all selections. Any subsequent changes will not be taken into consideration.
- For the Olympic Games all events will be settled on the official IOC results at the time of the medal/podium ceremony only. Subsequent disqualifications or amendments will not be counted for settlement purposes.
- Unless otherwise explicitly stated in the market or the sports specific rules below; all bets will be settled according to the rules for the relevant sport and/or the relevant general rule.
- Dead Heat Rules apply.
- If an event is postponed, bets will stand as long as the event takes place within 48 hours of the initial scheduled time. If the event is cancelled or takes place after this period, bets will be voided.

Olympics Settlement Rules

Country Golds/Country Medals

A market offering the customer the opportunity to bet on how many medals and or gold medals the named country wins at the stated Olympics.

- Team events count as one gold medal only
- Settled on the official IOC (International Olympic Committee) results.

Most Gold Medals

A market offering the customer the opportunity to bet on which country will receive the most gold medals at the stated Olympics.

- In the event of a tie, the following criteria in the following order will be used as tie-breakers:
 - 1) most silver medals
 - 2) most bronze medals
 - If there is still a tie after the above tie-breakers are applied, then bets will be settled as a dead-heat.
- Team events count as one gold medal only
- Settled on the official IOC (International Olympic Committee) results.

Most Medals

A market offering the customer the opportunity to bet on which country will receive the most total medals at the stated Olympic Games

- Gold, silver & bronze medals all count
- Team events count as one gold medal only
- Settled on the official IOC (International Olympic Committee) results.

Specific Olympic Sport Rules

Olympic Basketball

Matches are played under FIBA rules.

Olympic Field Hockey

Match betting will be settled on the result at the end of 60 minutes. Two-way match betting/to qualify markets will be settled on whichever team progresses to the next round/wins the event as determined by the IOC (International Olympic Committee).

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Table Tennis

General Table Tennis Rules

- In-Play Point Betting - Bets are offered for a player to win the nominated point. In the event of the point not being played for any reason, all bets on that point will be void. Specifically for the World Championships of Ping Pong (WCPP) where, all points gained from a 'Double Point' ball, count towards settlement.

Volleyball

General Volleyball Rules

- All bets on games-matches which start, but not completed, will be void unless rearranged and played on the same date (local time) or unless it is otherwise stated in the rules.
- All games-matches must start on the scheduled date for bets to have action.

Volleyball Market Rules

Winner

Offering the customer the opportunity to predict the outcome of the match

To Qualify

Will be settled on the team progressing to the next round of the specified competition, and includes the outcome of a Golden Set if played.

If a match does not adhere to the generally accepted format (e.g., unusual period length, counting procedure, format of a match etc.), Fanatics Sportsbook reserves the right to void bets.

Set Score

Predict the set scores at the end of the match. Bets are void if the statutory number of sets is not completed or changed.

- ~~Winner – Predict the winner of the game. A best-of-five-sets format is used. Golden Set is not counted for settling purposes.~~

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- ~~To Qualify will be settled on the team progressing to the next round of the specified competition, and includes the outcome of a Golden Set if played.~~
- ~~If a match does not adhere to the generally accepted format (e.g., unusual period length, counting procedure, format of a match etc.), Fanatics Sportsbook reserves the right to void bets.~~
- ~~Set Score – Predict the set scores at the end of the match. Bets are void if the statutory number of sets is not completed or changed.~~

Beach Volleyball

General Beach Volleyball Rules

- All Beach Volleyball bets, inclusive of any specials or statistics-based bets, will be settled in accordance with the official website of each tournament's respective governing body. For the Olympics, this would be the IOC (International Olympic Committee).
- All bets on matches which start, but are not completed, will be void except where the outcome is already known - unless they are rearranged and played on the same day (local time) and unless otherwise stated in the rules.
- All matches must start on the scheduled date for bets to have action.
- Bets are declared void in the event of a stated player being replaced.

Beach Volleyball Market Rules

Winner

A market offering the customer the opportunity to predict the winner of the game. This can be offered as a 2-way market, or a 3-way market where the tie is offered.

- In a 2-way market, the winner will be settled in accordance with the named winner of the event by the tournament's respective governing body.

Set Score

A market offering the customer the chance to predict the set scores at the end of the match. Bets are void if the statutory number of sets is not completed or are changed.

To Qualify

A market offering the customer the chance to predict who will qualify to the next round.

Water Polo

General Water Polo Rules

For all Outright and Tournament specific markets including, but not limited to, markets such as To Win Group/To Reach The Final/Name The Finalists, bets will be deemed no action if the scheduled number of games are not completed, unless the outcome is already determined. Where applicable, the podium presentation will determine the settlement of bets and any subsequent disqualification and/or appeal will not affect bets.

- All Water Polo bets, including any specials or statistics-based bets) will be settled in accordance with the official website of each tournament/sports respective governing body. For the Olympics, this would be the IOC (International Olympic Committee).
- If a specific series of matches, stages or round (e.g. Group Phase), or a competition in its entirety is not completed for any reason, then where bets have been placed on a market after the final completed relevant match, bets will be made void
- All game markets will be settled on regulation time, unless stated otherwise. Regulation time must be completed for bets to stand except where otherwise stated. In the event of a game starting but not being completed then bets will be deemed no action, unless the specific market outcome is already determined.
- All games must start on the scheduled date (local stadium time) for bets to have action.
- The following market includes overtime/shootout for settlement purposes:
Money Line

Odd/Even Markets

- Any score of zero in these markets are settled as 'even'.

The below listed markets will be offered for each quarter.

- Quarter Handicap/Quarter Winner/Quarter Goals/Team Quarter Goals/Quarter Race to Markets/Quarter Goals Odd or Even/Team Quarter Goals Odd or Even.

In the event of a specific quarter not being completed bets will be deemed no action, unless the specific market outcome is already determined.

The below listed markets will be offered for each half.

- Half Handicaps/Half Winner/Half Goals/Half Team Goals/Half Race to Markets/Half Goals Odd-Even/Team Half Goals Odd or Even.

In the event of a specific half not being completed bets will be deemed no action, unless the specific market outcome is already determined.

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Winter Sports

General Winter Sport Rules

- All Winter Sport bets _(including any specials or statistics-based bets,) will be settled in accordance with the official website of each tournament/sSports respective governing body. For the Olympics, this would be the IOC (International Olympic Committee).
- Bets on any participant who takes part in qualifying for a specified event, but then fails to qualify for the main round(s), will be settled as losers.
- Bets are declared void in the event of a stated player being replaced.
- If a match does not adhere to the generally accepted format (e.g., unusual period length, counting procedure, format of a match etc.), Fanatics Sportsbook reserves the right to void bets.

Effective Date: July 22, 2024

Section A: General Rules

1. General

1.1	This set of House Rules govern the use of ESPN BET, an interactive sports wagering platform operated by Penn Sports Interactive, LLC ("PSI") and its affiliates (collectively, the "Operator"). When placing a bet with the Operator, the Account Holder is therefore agreeing that the Account Holder has read, understood and will be adhering to these House Rules including the general House Rules at any time applicable to the Operator.
1.2	Your use of ESPN BETS's service is subject to the rules and regulations imposed by the Massachusetts Gaming Commission ("MGC").
1.3	ESPN BET may update, amend, edit and supplement these House Rules at any time in its sole discretion, subject to any required regulatory approvals, and any such changes shall be immediately in effect and binding on you.
1.4	ESPN BET's final determination as to the interpretation and application of the House Rules and the Markets, Events, odds, pricing, selections, and payouts is binding on you.
1.5	The use of ESPN BET is subject to the regulations imposed by the MGC. To the extent that any decision issued by the MGC conflicts, or is inconsistent, with these House Rules, the decision issued by the MGC will supersede any relevant clause(s) of these House Rules.
1.6	<p>Throughout these House Rules we define:</p> <p>Event: a competitive activity, typically a sporting game or match, which produces a set of results and for which odds can be offered for wagering.</p> <p>Participant: a player, team or other group of individuals who are taking part in an event.</p> <p>Market: a defined wagering opportunity, for which the results are clearly produced by the nature of the event in question.</p> <p>Selection: a possible outcome for a market, on which a patron can place a wager.</p>
1.7	Where a sport is not covered under the Sport Specific Rules, all wagers will be graded in accordance with official event rules and classifications.

2. Wager acceptance

2.1	We accept wagers as per the House Rules.
2.2	<p>We reserve the right to not accept any wager, in part or in full. We may refuse to accept a wager at any time and for any reason including in order to:</p> <ol style="list-style-type: none"> a) Preserve the viability of the offered market (for example, without limitation, in relation to events where there is an extraordinary or unbalanced number of bets on the same market). b) Protect the Account Holder (e.g., without limitation, in relation to the event in which the Account Holder displays pathological behavior and refuses to self-exclude). c) Protect other users (e.g., without limitation, in connection with the event in which the Account Holder has a betting pattern that could adversely affect the regular betting activity of other users). d) To protect the Operator (for example, without limitation, in the event that the Account Holder exhibits money laundering, collusive or fraudulent behavior, we suspect that Account Holder is using a third party's account, is allowing a third party to use the account, or is using automated means, bots, software or similar means, or engaging in arbitrage).

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2.3	We do not accept wagers at terms other than those posted.
2.4	We reserve the right to determine when wagering will be permitted on markets for a match, event, game or race (each an "Event") or any series of Events which comprise a tournament (each a "Tournament").
2.5	<p>For certain markets, as described in these House Rules and within the Sports Specific Rules, in the scenario where the result of the market means that neither selection can be graded as a winning selection, then all wagers on that market will be graded as a Push, and the patron will receive their stake back, or in the case of a parlay, the parlay will stand on all remaining selections and the odds of the wager are recalculated using odds of the remaining selections.</p> <p>An example of a market graded as a push is: a Total points market where the two selections are Over 200 and Under 200. If the final score of the match has exactly 200 points, then all wagers on both selections will be graded as a push.</p>
2.6	As highlighted in these House Rules and within the Sports Specific Rules, there are certain scenarios where a wager cannot be graded as a win or lose, due to the event not progressing far enough to allow for the market to be resolved. Here, wagers will be graded as No Action, and the patron will receive their stake back, or in the case of a parlay, the parlay will stand on all remaining selections and the odds of the wager are recalculated using odds of the remaining selections.
2.7	A Push, a No Action, and a Void selection are treated in the same way for single wagers and parlay wagers, but referred to under their respective names within these House Rules.
2.8	Wagers, or selections within parlay wagers, may be voided regardless of whether the event has been graded or not, subject to the rules and regulations set by the applicable Gaming Authorities. Refer to section '17. Void Wagers' for details on voiding.
2.9	References to an Event in these House Rules shall also apply to a Tournament, unless otherwise indicated. We will have the final decision whether a market relates to an Event or a Tournament.
2.10	All odds offered are subject to variation, at our sole discretion. Any odds previously published on the website, or on any other media channels will not be binding.
2.11	Wagers are valid only if there is action on an event. If an event has no action within a timeframe stated within Sports Specific Rules, then wagers will be treated as no action and stakes refunded. Should there be no action on an individual selection within a parlay wager, then that selection will be voided with the parlay wager standing on remaining selections and the odds of the wager are recalculated using odds of the remaining selections.
2.12	The overall minimum bet amount for online wagers is \$0.10. The overall maximum bet amount for online wagers is \$1,500,000. Within these limits, we will determine minimum and maximum wager limits on a wager by wager and patron by patron basis, at our sole discretion. Pursuant to 205 CMR 247.08 (3), the Operator may, in its discretion, permit a player to wager below the established minimum wager or above the established maximum wager.
2.13	Wagers will be accepted until the start of an event. Wagers will be accepting during event when In-Play wagering is permitted.
2.14	Start times are for guidance only and are subject to change. Therefore, markets can suspend any time as we deem necessary.
2.15	All wagers may be subject to a time delay prior to acceptance, the length of which may vary, at our sole discretion.
2.16	If an event or a tournament does not meet the minimum length to be considered official, we reserve the right to declare no action and void wagers.
2.17	Patrons may not have a negative account balance. A wager will not be accepted if the account does not have sufficient funds to pay for the wager at the time of wager placement.
2.18	We may restrict, suspend, limit or revise the availability of a promotion at any time, either on a wager by wager or patron by patron basis, at our sole discretion.

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2.19	While we aim to grade all wagers as soon as possible, we reserve the right to delay grading of wagers until there are official results available. We may use other sources of information for grading where there is a clear outcome.
2.20	If there is a change to the format of an event such that the nature of the event is significantly affected, we reserve the right to declare no action and void wagers, or those selections within a parlay wager, subject to rules on voiding wagers as may be set out by the applicable Gaming Authorities.
2.21	Patrons are responsible for ensuring wagers placed are to their satisfaction. A bet is not accepted and confirmed until it shows in the Account Holder's bet history. Once a wager is accepted, it will be graded according to the House Rules. Requests from patrons to cancel wagers will be considered at our sole discretion, subject to the rules and regulations set by the applicable Gaming Authorities.
2.22	We will only consider official definitions from the relevant governing body for the grading of wagers.
2.23	All payout calculations when grading wagers will be based on Decimal Odds, irrespective of any other format displayed/chosen at the time of placement.
2.24	For display purposes, when necessary, the second digit after the decimal point of the odds is shown as rounded up in the Account Holder's wager history to the nearest decimal number. The payout will however be made based on the actual odds multiplied by the stake, disregarding the aforementioned rounding.
2.25	Should a dispute arise about the acceptance (or lack thereof) of any wager, or the time at which any wager was placed, the Operator's transaction log database will be the ultimate authority in determining such matter.

3. Funding accounts

3.1	Patrons must fund wagers by depositing into their accounts through offered funding methods.
3.2	A customer may fund their account on the Operator's sportsbook platform through the following methods: <ul style="list-style-type: none"> • Debit card; • Prepaid account; • Wire transfer; • Digital Payment Vehicles; • ACH/Online Banking; and • Such other options that may become available in the future at our sole discretion. <p>In no event may a Massachusetts account be funded through a form of credit.</p>
3.3	We may issue rewards to patrons, including as part of a promotion or rewards program, which may be used to wager on markets on the service. These rewards include, but are not limited to, bonuses and other credits.
3.4	Patrons may request that their Eligible Balance be made available for wagering in Permitted Jurisdictions in which they have an account, subject to any applicable regulations. Some regulations may prohibit the transfer of Eligible Balances from one Permitted Jurisdiction to another. Furthermore, each Permitted Jurisdiction may have its own criteria in determining what qualifies as an Eligible Balance, and each Permitted Jurisdiction may restrict the availability of certain portions of the funds in your Account for wagering. Funds, as used in this section, shall mean cash and cash equivalent, bonuses, and other credits available to be used for wagering purposes within the Service.
3.5	Permitted Jurisdictions within the United States of America will use United States Dollars (USD) as the currency.

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3.6	Payouts on wagers will be made according to the House Rules. We reserve the right to make the final decision on payouts.
3.7	We will not accept wagers where the payout amount is more than \$2,500,000 (“Maximum Payout”).
3.8	Should we determine that one or more patrons have acted together in a coordinated manner to circumvent the House Rules, including, but not limited to, the Maximum Payout limit, we may subject those patrons' wagers to the Maximum Payout limit collectively, or void the wagers, subject to restrictions on voiding wagers as may be set out by the applicable Gaming Authorities.
3.9	The payout for wagers will be rounded to the nearest cent (\$0.01).
4. Parlays	
4.1	Parlays are wagers which include more than one selection (i.e., a wager which includes two or more selections or “legs” is a parlay wager). The odds of a parlay are calculated directly using the individual odds of each selection, with potential returns displayed within the betslip.
4.2	If a parlay wager has selections that are pushes, no action, or voided, then the wager reduces to the remaining valid selections and the odds of the wager is recalculated using odds of the remaining selections.
4.3	The specific nature of some markets, typically Proposition and Futures markets, determines whether selections from those markets can be included in parlays. This is determined at our sole discretion.
4.4	Where we deem that two or more selections are related, such that the result of one of those selections materially affects the probability of another of those selections to win, these selections are not permitted to be combined within a parlay wager with the exception of Same Game Parlays and Parlay+ wagers as described in the next section.
4.5	Teasers are a type of parlay with the possibility to allocate the same pre-set number of points to all outcomes present in a parlay containing Spreads, Totals or a combination of both. Should any part of a Teaser wager be graded as a push, no action, or voided, then that particular selection will be excluded from the parlay and the odds/payout will be re-adjusted removing the voided or push legs.
5. Same Game Parlays	
5.1	If a parlay wager includes selections from two or more markets on a single Event, it is known as a Same Game Parlay wager. As the selections within a Same Game Parlay wager may be related to each other, the odds are not directly calculated from odds of the individual selections, instead, we provide the odds for each request.
5.2	Pre-game Same Game Parlays will be graded as follows: <ul style="list-style-type: none"> a) If all the selections within a pre-game Same Game Parlay win, the wager will be graded as a win. b) If any selection(s) within a pre-game Same Game Parlay are a push or void, and all remaining selection(s) within that pre-game Same Game Parlay are a win (i.e., there are no losing selections), the wager will be graded as a win with re-calculated odds and payout reflecting the remaining legs that are not a push or void. c) If any selection within a pre-game Same Game Parlay loses, the wager will be graded as a loss, regardless of any other selections that are a push, void, or win.

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	d) If all selections within a pre-game Same Game Parlay are a push or void, the pre-game same game parlay selections will be graded no action and stakes refunded.
5.3	<p>Live Same Game Parlay will be graded as follows:</p> <p>a) If all the selections within a Live Same Game Parlay win, the wager will be graded as a win.</p> <p>b) If any selection(s) within a Live Same Game Parlay are a push or void, the wager will be graded no action and stakes refunded.</p> <p>c) If any selection within a Live Same Game Parlay loses, and there are no selections that are a push or void, the wager will be graded as a loss.</p>
5.4	For rules regarding Pre-built Same Game Parlays see section 26.
6. Parlay+™	
6.1	<p>Parlay+™ wagers are those consisting of one or more Same Game Parlay wagers and may also include other individual selection(s) on unrelated Event(s). The following is an example of a 5-leg Parlay+™ wager:</p> <p>Selection A and Selection B on Event 1 + Selection C and Selection D on Event 2 + Selection E on Event 3.</p>
6.2	If a Parlay+™ wager has any selections that are pushes, no action, or voided, then each Same Game Parlay part of that Parlay+™ wager will be graded as per 5.2 for pre-match wagers or 5.3 for live wagers, with the Parlay+™ wager then standing on the Same Game Parlays and individual selections on the unaffected events.
7. Abandonments, Cancellations, Postponements	
7.1	Unless otherwise stated in the Sports Specific Rules section of the House Rules, if an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours of its start time.
7.2	Unless otherwise stated in the Sports Specific Rules section of the House Rules, if a tournament is not completed within 48 hours of the scheduled completion date, then selections related to the tournament will be graded in line with the official ruling of the governing body for that tournament, provided any such ruling is made within 90 days after the originally scheduled completion date of the tournament. If no such ruling is made within this 90-day period then wagers on markets related to the tournament will be deemed no action and refunded, except for those which have already been determined.
7.3	If there is no further sporting action in any Event, all wagers placed after the conclusion of action will be voided and refunded.
8. Futures	

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8.1	Unless otherwise stated, Futures wagers are graded in accordance with the official result of the relevant governing body. If no such result is declared, wagers will be deemed no action and stakes will be refunded. Subsequent challenges, appeals or other changes to the determination of the governing body's results will not be recognized and wagers will not be regraded.
8.2	Unless otherwise stated in the Sports Specific Rules section, 'To Qualify' markets, for example a "To Make the Playoffs" market, will be graded on the basis of which team progresses, regardless of whether or not they play in the relevant round or event. Later disqualifications will not result in wagers being regraded.
8.3	In the event a player or team is not offered for wagering due to state regulations and the market only has one winner (e.g., NCAAF Championship Winner), all wagers on this market will be deemed no action and voided. This does not include wagers that have already been cashed out by the patron and have been graded at a specific cash out price. If a market has multiple winners (e.g., NCAAB regular season Conference Winner, To Make Playoffs) and a non-listed team or selection wins, all wagers are action.
9. Suspicious Wagering Activity	
9.1	If we have reasonable grounds to believe events may be subject to manipulation, illegal activity of other activity which violates the House Rules, we reserve the right to withhold payouts pending the outcome of any investigations. Based on the outcome of any investigations, we reserve the right to void wagers, subject to applicable gaming regulations.
10. In-Play Wagering	
10.1	Markets can be offered as events are taking place, which is referred to as In-Play wagering. We reserve the right to determine on which events In-Play wagering is offered, and at what times. In-Play wagers may be subject to a time delay at our discretion, for a period of time which is also at our discretion.
10.2	It is the patron's responsibility to ensure they have all the relevant information or data related to events on which they choose to wager. We cannot accept any responsibility for wagers that are placed where the patron has incorrect or incomplete information or data.
11. Grading	
11.1	We will use the official results from the relevant governing body when settling wagers. When official results are delayed, we reserve the right to delay the grading of wagers or to use alternative sources if the outcome is clear and unambiguous. With the exception of the correction of clear errors, any changes to results after events have concluded and results have been announced will not be recognized and wagers will not be regraded.
11.2	We reserve the right to grade markets prior to the completion of events where there is a clear result.
11.3	If wagers have been incorrectly graded due to, among other things, incorrect information or data or an error in the grading process, then we reserve the right to amend the grading of affected wagers.
11.4	Patrons expressly acknowledge and agree that our final determination with respect to any results and grading of a market is final, determinative and binding, and we may revise account balances to reflect changes based on the determined results and grading.
12. Forfeited Events	

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12.1	Unless stated otherwise in the Sports Specific Rules section, if an event does not take place due to the requirement from a governing body that one of the teams or participants must forfeit the event, then wagers on that event will be deemed no action and stakes will be refunded, except in cases where the outcome of wagers has already been determined.
12.2	The results of forfeited events will be considered when settling wagers that extend beyond the time period of those events, such as Futures or Proposition wagers. For example, a team's "Season Wins" will consider the outcome of forfeited games in which the team was involved.
13. Change of Venue	
13.1	Unless otherwise stated in the Sports Specific Rules section, if the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
14. Off-Field Decisions	
14.1	Should off-field officials overturn the decision of on-field referees or equivalents, for example Replay Officials in football, VAR checks in soccer or Hawkeye reviews in tennis, we reserve the right to re-grade, void and refund wagers during the period between the initial on-field decision and the subsequent correction.
15. Dead-Heat Rules	
15.1	<p>For outright markets, in cases where there are ties in the results between winning selections, then the dead heat rule will apply. The payout will be determined by dividing the amount wagered by the number of selections that tied in the case where there is only one expected winner of the wager.</p> <p>For example, you wager \$5 on a golfer to have the best score among a group of 3 at +150 odds (2.5 decimal odds). The event ends with two golfers tying for the best score in the group. As a result, the original odds (+150) are divided by the number of participants who tied (2) resulting in reduced odds (Decimal odds calculation: Original odds (2.5) divided by 2 equals 1.25). Therefore, your payout would be \$6.25 ($\\$5 \times 1.25 (-400) = \\6.25)</p>
15.2	<p>If the market is expected to have more than one winner, for example a Finish in the Top 10 wager, then the amount wagered is multiplied by the number of expected winners for that particular result and divided by the number of actual winners for that result.</p> <p>For example, a wager on a player to finish in the Top 5 places in a tournament that finished tied for 3rd alongside five other players would see the wager amount multiplied by 3 and divided by 6 as the 3rd, 4th and 5th places are shared by six players. So, in this example, the payout for the wager would be half (3/6) of the full payout.</p>
16. Data and Information	
16.1	We display all our markets and wagering opportunities within our service.
16.2	We use third parties to source information and data which is provided to patrons on an "as is" basis. We cannot guarantee the accuracy of such information and data and therefore cannot accept any responsibility or liability for any errors or omissions within this information and data. Your reliance and use of this information or data is entirely at your own risk.
16.3	Patrons are responsible for ensuring that wagers are placed to their satisfaction and details are correct. Patrons agree that our interpretation of the House Rules is binding.

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16.4	Patrons expressly acknowledge, understand, and agree that we reserve the right, at our sole discretion, to correct any inaccuracy or error we determine exists with respect to such information and data. We disclaim all representations and warranties that any information and data provided are accurate, error-free, or without delay, and further disclaim all liability for any and all inaccuracies, errors, and/or delays in any information and data.
17. Void wagers	
17.1	From time to time, for reasons highlighted within these House Rules, we may have to Void a wager, or a particular selection within a parlay wager. We reserve the right to void a wager, or a particular selection within a parlay wager, subject to rules on voiding wagers as may be set out by the applicable Gaming Authorities.
17.2	Patrons acknowledge that we determine if wagers should be voided or not at our sole discretion, subject to accordance with rules and regulations of all applicable Gaming Authorities.
17.3	We may be obliged to void wagers even after wagers have been accepted.
17.4	Bets can be voided regardless of whether the event has been settled or not.
17.5	We reserve the right, to declare a bet void, totally or partially, with prior authorization of the MGC, if any of the following, or similar, circumstances have occurred: <ul style="list-style-type: none">• Bets have been offered, placed and/or accepted due to an Obvious Error (see Section 18. Obvious Errors);• Bets placed while the website or app was encountering technical problems, that would otherwise not have been accepted;• As directed by the MGC.
17.6	Patrons agree not to place wagers where the outcome is already known and that we may void such wagers as our sole discretion, subject to rules and regulations imposed by the MGC.
18. Obvious Errors	
18.1	We reserve the right to void wagers due to an "obvious error", also called a Palpable Error, in the odds, subject to accordance with rules and regulations of all applicable Gaming Authorities.

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18.2	<p>Examples of "obvious errors" include, but are not limited to:</p> <ul style="list-style-type: none"> • Cyber attacks. • Bets accepted during technical problems that would otherwise not have been accepted. • On events/offers that have already been decided or concluded, or in relation to which the Operator had suspended betting. • When a bet slip does not correctly reflect the wager. • On markets/events containing participants that are not part of the event. • Otherwise than in accordance with the applicable laws. • At odds that are materially and objectively different from those available in the general betting industry at the time the bet was accepted, the Operator will use a majority of betting industry operators, to determine whether odds offered were "objectively different". • 'Pre-match' bets placed/accepted after the event has started. • Bets placed following the last instance that a participant/outcome had any chance to influence the match/event scoring applicable to the relevant market and an eventual withdrawal/disqualification/cancellation/format change or anything which precludes the ability of the applicable participant/outcome to influence said scoring will be declared void. • Related contingencies: Unless placed via the Operator's in-event combination functionality, or offered explicitly as a specific offering, the Operator prohibits accumulator bets that include two or more outcomes which might turn out to be related (e.g. Team X to become champions and Player Y to be Top Goal Scorer in the same league). • Bets placed on events that should not have been available for wagering.
18.3	<p>In order to correct an "obvious error" we may void wagers and make the appropriate adjustment to account balances, subject to compliance with applicable regulatory requirements. Patrons agree that we have the right to reclaim funds or winnings from their Accounts at our sole discretion.</p>
18.4	<p>We reserve the right to cancel, remove or otherwise change any of the service at any time.</p>
<h2>19. Cash Out</h2>	
19.1	<p>We offer a Cash Out feature, whereby wagers can be graded early, before events have concluded. This feature is offered at our sole discretion and may not always be available.</p>
19.2	<p>Cash Out requests may be subject to a time delay.</p>
19.3	<p>Successful Cash Out attempts will prompt a message, a record will be made available in the transaction history and funds will be credited to the patron's account. Any subsequent events that occur in relation to the original wager will not be considered.</p>
19.4	<p>A Cash Out attempt is considered a wager like any other and is subject to all the same rules and regulations as per the Governing Documents. Please note, patrons must be in the same Permitted Jurisdiction as they were when the original wager was placed in order to request a Cash Out for that wager.</p>
19.5	<p>Cash Out is not available on wagers placed using bonus wagers or other promotional credits.</p>
19.6	<p>We reserve the right to remove the Cash Out feature on a patron-by-patron basis.</p>
19.7	<p>If a Cash Out attempt has been made on a wager, it may not qualify for certain promotions.</p>
19.8	<p>If Cash Out is available on wagers used to unlock bonuses, any cashback unlocked on that cashed out wager would be converted back to bonus, available to be unlocked on subsequent eligible wager(s) provided the bonus has not expired.</p>
<h2>20. Prohibited Wagers</h2>	

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20.1	<p>Wagers on the following are prohibited:</p> <ul style="list-style-type: none">• Any Collegiate Sport or Athletic Event:<ul style="list-style-type: none">○ With an outcome dependent on the performance of an individual athlete, including, but not limited to, in-game or in-play wagers;○ Involving any collegiate teams from the Commonwealth, unless the teams are involved in a Collegiate Tournament.• Any eSports event that:<ul style="list-style-type: none">○ Is not sanctioned by an approved Sports Governing Body or equivalent as authorized by the Commission; and○ Has not been endorsed by the Commission pursuant to the procedures set forth in 205 CMR 247.03;• Any virtual sports event unless:<ul style="list-style-type: none">○ A Random Number Generator (RNG), certified by an independent testing laboratory, is used to determine the outcome(s);○ A visualization of the virtual sports event is offered to all patrons which displays an accurate representation of the result(s) of the virtual sports event; and○ The virtual sports event is approved pursuant to the procedures set forth in 205 CMR 247.03;• Any horse or greyhound races;• Any injuries, penalties, player discipline, or replay review;• Any high school or youth sports or athletic events;• Any fantasy contest unless offered pursuant to M.G.L. c. 12, § 11M½ and 940 CMR 34.00: Daily Fantasy Sports Contest Operators in Massachusetts;• Any Sporting Event or Wager Category in which the outcome has already been determined and is publicly known; or• Any other Sporting Event or Wager Category until the Sporting Event or Wager Category has been approved by the Commission in accordance with 205 CMR 247.03.
21. Prohibited participants	
21.1	<p>The following persons are prohibited from placing wagers through the Operator's sportsbook platform:</p> <ul style="list-style-type: none">• A person that is under 21 years old;• PSI employees, its directors, officers, owners and employees or any relative living in the same household;• An individual with proprietary or non-public information held by PSI;• A professional or athlete, coach, referee, team owner, employee of a Sports Governing Body or its member teams and patron and referee union personnel, seeking to place Sports Wagers on events in the sport in which the individual participates, or in which the athlete the individual represents participates;• Persons placing Sports Wagers as agents or proxies for others;• Any individual prohibited from Sports Wagering pursuant to 205 CMR 250.00;• Any individual who is self-excluded from Sports Wagering pursuant to 205 CMR 233.00;• Any individual who is prohibited from or subject to limitations regarding Sports Wagering pursuant to 205 CMR 254.00 and 255.00;• Any individual Wagering while not in the authorized geographic boundaries within the Commonwealth;• Any restricted patron Wagering in violation of their restrictions established in 205 CMR 238.32;• Any individual Wagering in violation of state, local or federal law;• Other prohibited persons as determined by the MGC.
22. Disputes	

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22.1	Any dispute relating in any way to the use of the Operator's sportsbook platform should be made via email to support@espnbet.com or by calling (844) 953-2121 to request a callback. Our player experience department will do everything in its power to solve all player disputes within seventy-two (72) hours of initial contact.
22.2	In the unlikely event the response is not considered satisfactory and the issue is not solved in an adequate fashion for the player, A patron can contact the MGC directly to file a complaint by accessing https://massgaming.com/regulations/fairdeal/ and completing the requisite information. Patrons can submit disputes by calling the Commission's Integrity Tip Line at 1 (844) 303-8477 or completing a form (found on https://massgaming.com/regulations/fairdeal/) and sending it via email to MGCcomments@massgaming.gov , or mailing it to: Massachusetts Gaming Commission, 101 Federal Street, 12th Floor, Boston, MA, ATTN: Sports Division.
23. Miscellaneous	
23.1	Any results or scores of which you may be advised by an ESPN BET employee or agent (for example during wagering in-play) are provided for guidance purposes only and shall not determine the actual grading of the Event.
24. Overtime	
24.1	<p>For some sports, overtime periods or equivalents are considered for wagers, while for other sports, they are not.</p> <p>For example, football markets are graded on the result after any Overtime is played, while for soccer, markets are graded on the result at the end of Regulation Time but before any Extra Time period is played, unless clearly labelled otherwise.</p> <p>Please refer to the Sports Specific Rules section for each sport for an explanation of how markets for that particular sport consider overtime periods.</p>
25. General Market Rules	
25.1	In the case of any discrepancies between these General Market Rules and those listed within Sports Specific Rules, the Sports Specific Rules will take priority and be used to grade wagers.
25.2	<p>Points Spread wagering, or Handicap wagering, is a market that is determined by the result of an event after the listed spread, or handicap, is applied to the points/score of the outcome that is wagered on.</p> <p>For example, an NBA match has a points spread of +3.5 points for Team A and -3.5 points for Team B. Wagers on Team A +3.5 will win if Team A loses the game by no more than 3 points, or wins or ties the event. Conversely, wagers on Team B -3.5 will win only if Team B wins by 4 or more points.</p> <p>Should the result of the event be a tie after the spread is applied, and the market does not explicitly quote a "tie" or "draw" selection, then the market will be graded as a push and stakes will be refunded.</p>
25.3	<p>3-way Handicap markets are handicap markets where a "tie" or "draw" selection is listed, and as such can be graded as the winning selection in the market with all other selections graded as losers.</p> <p>For example, as soccer match has a 3-way handicap with the home team having a -2 goal handicap. If the home team wins by more than 2 goals, the home team selection will be graded as the winner; if the home team wins by exactly 2 goals, the "tie" will be graded as the winner; and if the home team wins by exactly 1 goal or both teams score an equal number of goals or the away team wins by any number of goals, then the away team selection will be graded as the winner.</p>

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25.4	<p>Asian Handicaps or Asian Lines are a type of handicap market that have the following grading rules:</p> <p>(a) Half lines - this is where the line quoted within the market ends with x.5, and wagers will be graded in accordance with 24.1</p> <p>(b) Whole lines - this is where the line quoted within the market ends with x.0, and wagers will be graded in accordance with 24.1, where it is possible for markets to be graded as a push, with stakes refunded</p> <p>(c) Quarter lines - this is where the line quoted within the market ends with x.25 or x.75. Here, half of the stake is placed on closest Half line and half of the stake is placed on the closest Full line. Each part is then graded separately in accordance with 25.1</p> <p>This means that it is possible on Quarter line Asian Handicaps and Asian Lines to receive half of your stake back as a push, with the other half either a winner or loser.</p>
25.5	<p>The Moneyline is a market with two outcomes, one for each team, that is determined by the outcome of the event. A draw option is not listed. Should the event end in a tie this market will be graded as a push, with stakes refunded.</p>
25.6	<p>Match wagering, also called Win-Draw-Win, 1X2, Regular Time or 60 Minute Line, is a market with three outcomes, one for each team and a tie option. This market will be graded on the result of the event at the end of Regulation Time, and Overtime will not be considered unless stated otherwise.</p>
25.7	<p>Totals wagering, also called Over/Under, is a market that is determined by the number of occurrences (goals, points etc.) that take place during the event. If the total exactly equals the quoted line, then the market will be graded as a push and stakes will be refunded.</p>
25.8	<p>Correct Score, also called Exact Result, is a market that is determined by the exact or partial result of an event, as determined by the scoring system that is used to decide the winner.</p>
25.9	<p>Futures wagering, also called Outright wagering, is a market that is determined by the classification of an event or series of events or competition.</p>
25.10	<p>Place wagering is a type of Futures or Outright wagering which is determined by whether or not the selection that is wagered on finishes in the top places as listed in the final classifications.</p> <p>For example, Top 10 wagering for a PGA Tour event will be graded based on whether a player finishes in the top 10 places on the final leaderboard.</p>
25.11	<p>The "Betting without X" market is offered on races, tournaments, or other competitions where a clear finishing order can be determined.</p> <p>A Betting Without market specifically states a participant or multiple participants who are not included as selections within the market. The market is then graded based on which of the remaining participants finishes highest.</p> <p>For example, in a "Betting without Tiger Woods" market on a golf tournament, if Tiger Woods was not to win the tournament, the player that did win the tournament would be graded as the winning selection. If Tiger Woods was to win the tournament, the player that finishes second would be graded as the winning selection.</p>
25.12	<p>The "Straight Forecast" market requires you to predict the participants that will finish both first and second, in that order, within a race, tournament or similar. If either is incorrect then the wager will be graded as a loser.</p>
25.13	<p>The "Dual Forecast" market requires you to predict the two participants that finish first and second in a race, tournament or similar, irrespective of the order. If either of your selections do not finish first or second, then the wager will be graded as a loser.</p>

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25.14	<p>Period wagering markets are determined by the outcome of defined periods within an event. If the periods of the event are changed such that the timeframes listed cannot be determined, then wagers will be voided.</p> <p>An example of this type of market would include Quarter wagering in basketball, such as 1st Quarter Over/Under Points which is determined by the total number of points scored in the first quarter of the event.</p>
25.15	<p>"Tie no bet" or "Draw no bet" markets are determined by the outcome of the event, with the market being graded as a push if the result is a tie or a draw, with stakes refunded.</p>
25.16	<p>Virtual matches are determined by comparing the scores of the listed teams in the events they are due to compete in, despite the teams not directly confronting each other in the same event.</p> <p>The following conditions apply:</p> <ul style="list-style-type: none"> i) Unless specifically stated, the wagers refer to the next official match/event/round (as applicable) that the listed participants/teams are scheduled to take part in ii) The events in question must be completed within the scheduled time period for wagers to stand, except for offers which have been determined prior to abandonment and could not be changed regardless of future events, which will be graded in accordance with the decided outcome iii) Results determined by walk-overs or not derived from actual action will not be considered. iv) Should the aforementioned criteria be inconclusive in determining the outcome for these offers, the following criteria will be progressively referenced to in order to grade the offering: the applicable Sports Specific Rules; Result Grading rules v) Wagers will be graded as no action should it still be impossible to determine a winning outcome
25.17	<p>Over/Under Finishing Position is a market that is determined by the classification of events as follows: Under means that the outcome of the wager has achieved a position better than the listed position, while Over means that the outcome has achieved a worse position.</p>
25.18	<p>Odd/Even is a market that is determined by whether the total number of the occurrences listed is an odd or even number. This market will only be offered when the occurrences in question can only happen in whole integer numbers, e.g., 1,2,3</p>
25.19	<p>Half time/Full time markets are determined by the result of the event at half time and then at full time. This will only be offered for events in which the concept of half time is clearly defined.</p>
25.20	<p>Double Chance markets are determined by the result of the event, but the listed selections include two of the three possibilities, as such there will always be two winning selections for this market. For example, for a soccer game the options are: Home/Draw, Home/Away and Draw/Away. Double Chance wagers are graded at the end of Regular Time, unless otherwise stated.</p> <p>Example, if a soccer game ends in a Home win then both the Home/Draw and Home/Away selections will be graded as winners, while the Draw/Away outcome will be graded as a loser.</p>
25.21	<p>Race to X is a market that is determined by which outcome reaches the listed occurrence first. Only occurrences that happen during the time period stated will be considered. Should the listed occurrence not be reached, and "neither" (or similar) is not quoted, then wagers will be graded as no action and stakes will be refunded.</p>

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25.22	<p>Winner of Point/Next to Score is a market that is determined by which selection achieves the listed occurrence first. Previous occurrences will not be considered and if the none of the listed occurrences happen, then wagers will be graded as no action and stakes refunded, unless a selection of "none to happen" (or similar) is specifically listed.</p> <p>Should it not be possible to determine the exact order in which occurrences happened, for example, if players from each team are given a penalty at the same time for a single passage of play, then wagers will be graded as a push and stakes refunded.</p>
25.23	<p>MVP, Player of the Match etc. markets will be graded according to the competition organisers' official decision, unless otherwise stated.</p>
25.24	<p>Grand Salami is a market that is graded by the total number of occurrences across a number of events during a specified time period. All relevant events must be completed for wager to be consider to have action, except for outcomes for which the result has already been determined such that further play could not affect the outcome, which will then be graded according to that outcome.</p>
25.25	<p>Wagers on "Result at end of Quarter / Half / Period X" refer to the result of the match/event after termination of the stipulated timeframe and will consider all other points/goals/events tallied from previous parts of the event/match. Wagers on this market will be declared void should the match be played in a format where it is impossible to determine an outcome for the timeframes specified in the offer.</p>
25.26	<p>Wagers referring to "Rest of the match" or similar will consider only outcomes and occurrences obtained from the time of wager placement until the end of the listed timeframe, thus disregarding any occurrences registered before the time the wager was placed and accepted.</p> <p>For example, for a "Rest of the Match Winner" market on a soccer match where wagers are placed when the score is 1-0, should the match finish with a score of 1-0, the "draw" will be deemed the winning selection and all other selections deemed as losing ones.</p>
25.27	<p>In some markets a selection called "The Field" is included. This selection will be graded as a winning selection if none of the other explicitly named selections are determined to be the winner.</p>
25.28	<p>"Team/Player Progress Further" - if both teams/players are eliminated at the same stage, all wagers will be deemed no action regardless of any other statistics such as games played</p>
25.29	<p>Draft markets:</p> <p>All draft markets will be graded at the time of the draft. Any trades occurring after the draft will not be considered for grading purposes.</p> <p>Draft props: the official competition website will be used for grading purposes (e.g., a player's Nationality/Country, position, school, etc.).</p> <p>Draft position: for over/under markets, if a player is undrafted, the "over" selection will be deemed the winner.</p> <p>Number X overall pick: wagers will be settled according to the official draft position as the pick is made, irrespective of any trades made following the announcement of the pick.</p>
25.30	<p>Player Awards markets (e.g., MVP):</p> <p>All bets will be considered action regardless of players taking part.</p>

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26. Exclusives, Boosts and Specials	
26.1	<p>Pre-built Same Game Parlays are wagers where multiple selections from the same event are explicitly listed as a wagering opportunity without the patron needing to add the individual selections to the betslip themselves.</p> <p>Wagers of this nature will generally be listed under the Exclusives section of the wagering menu.</p> <p>Pre-built Same Game Parlays where one or more selections are deemed to be void will be graded as void in their entirety unless one or more selections is graded as a losing selection in which case wagers will be graded as losing.</p>
26.2	<p>We may offer Odds Boosts and Special Markets in a clearly marked section of the Services. Unless otherwise stated below, wagers will be governed by the above sport-specific betting rules. Specific rules for individual Markets will be displayed within the Service, as applicable. Additional wager limits may apply.</p>
26.3	<p>For Boosts, the “Was” odds correspond to the unboosted odds of the wager at the time that the selection was published. Any subsequent movement in odds may not be reflected in the “Was” price. If there’s no offer from an original Market on the Odds Boosts, the ‘Was’ price will be determined based on market average pricing for the Event.</p>
26.4	<p>All Events must be completed for wagers to stand. Wagers will be deemed “no action” and refunded if all Events listed are not completed, unless the result has already been determined.</p>
26.5	<p>All games must be played.</p>
26.6	<p>Players featuring in Baseball, Soccer, Rugby Union and Rugby League must start. Players featuring in other sports must be in play at some point during the game.</p>
26.7	<p>If any part of the Odds Boost or Special Market is deemed “no action”, then the entire Odds Boost or Special Market will be deemed “no action” and refunded, unless the result has already been determined.</p>
26.8	<p>Unless stated otherwise, the wager refers to the next official Event that the listed team or participant(s) are scheduled to participate in.</p>
26.9	<p>Where a collective group of participants is described but not named (for example: Any American to Finish Top 5), wagers will stand if a single participant from this group participates in the Event (for example: 1 American participating in the race). If this is not the case, wagers will be deemed “no action” and refunded.</p>
26.10	<p>All wagers will be graded as per the official statistics from the sport governing body at the end of the Event. Statistical corrections after the grading will not result in wagers being regraded.</p>
26.11	<p>We reserve the right to withdraw any Odds Boosts or Special Markets, and/or edit the respective odds on the enhanced price at its sole discretion.</p>

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Section B: Sport-Specific Rules	
Baseball	
Overtime (or equivalent)	
BS.1.1	All markets include Extra Innings unless stated. Markets that exclude overtime are denoted using "9 innings only."
Abandonment or postponement	
BS.2.1	If a regular season event is abandoned, cancelled, suspended, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be fully determined will be deemed no action if the event does not resume and complete within 48 hours of its start time.
BS.2.2	If a play-off event is abandoned, cancelled, or postponed, all wagers are considered action until the event concludes.
BS.2.3	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
BS.3.1	In the scenario that the number of innings is reduced from the scheduled number, money line wagers will only be considered as action after 5 completed innings, or 4.5 completed innings if the team batting second is leading at that point.
BS.3.2	In the scenario that the number of innings is reduced from the scheduled number, "Run line" and "Totals" wagers are considered as action after 9 completed innings, or 8.5 completed innings if the team batting second is leading at that point.
Futures	
BS.4.1	Regular MLB Season Wins/Matchups: A team must complete at least 160 regular season games for wagers involving that team to have action unless the result has already been determined.
BS.4.2	Regular MLB Season Specials: All markets refer to season statistics available from the MLB (or applicable governing body). Unless otherwise stated, all wagers are considered action regardless of season length.
BS.4.3	Regular MLB Season Player Specials: All markets refer to season statistics accrued in MLB and are transferable between American League and National League. Statistics from any other league e.g., Triple-A do not count. A player must participate in at least one game starting line-up to be considered action. All Pennant and League futures markets include the postseason. For all Regular Season and Post Season statistical leaders, dead heat rules apply if multiple players tie for the lead of a statistical category.
BS.4.4	Series wagers will be deemed void if the stated number of games required to win the series changes (according to the official governing body).
General market rules	
BS.5.1	Wagers include extra innings, unless otherwise stated.
BS.5.2	Wagers are considered action at the stated odds, regardless of starting pitchers. Displayed pitchers are for information purposes only.
BS.5.3	In competitions where the "Mercy Rule" is used, if this rule is invoked, then wagers on all markets are considered as action.
Specific market rules	

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BS.6.1	The inning or period money line winner will be considered as the team leading at the end of the specified period. In the event of a tie at the end of the specified period wagers will be graded as a push, unless the 'tie' selection is quoted.
BS.6.2	Period Run line or handicap markets will be graded based on the score at the end of the specified period, after the stated handicap is applied.
BS.6.3	Period Total runs markets will be graded based on the total score at the end of the specified period.
BS.6.4	If any period is not completed, then all wagers will be deemed no action and voided.
BS.6.5	Player Prop wagers are deemed no action and voided if the applicable player does not participate in the event.
BS.6.6	Player Prop wagers will be deemed to have participated in an event if: The starting pitcher must throw the first pitch for their team; The relief pitcher must enter the event and throw at least 1 pitch; If a player is a position player, they must be in the official starting line-up and make at least 1 plate appearance; If a player is a designated hitter, they must register at least 1 plate appearance.
BS.6.7	Daily player wagers: All players from different teams/events must play in the stated events for wagers to be considered as action. If any listed player does not play in the stated game, then all wagers will be deemed no action and voided. Wagers are deemed no action and voided if the player is not in the game before any outcome is determined.
In-play	
BS.7.1	Player props: Players are considered as participating when: for position players, they take 'at-bat', and for pitchers, they throw a pitch, after the wager is placed. Players do not need to be in starting lineup for action.
BS.7.2	Pitch result markets: "Hit by pitch" and "pitch out" are included in grading for "Ball". "In Play" includes any type of hit (single, double, etc.) in addition to any batted ball which results in an out(s) being recorded. Reaching on error and failed fielder's choice will be graded as "In Play", with the exception of catcher interference. If a batter swings and misses or fouls off the pitch and catcher interference is called, the pitch result market will result as "Strike/Foul". If a batter hits the ball into play, regardless of whether or not catcher interference is called, "In Play" will be the winning selection.
BS.7.3	Total pitches/strikeouts markets: Automatic balls/strikes and balks do not count towards grading. A dropped third strikeout where the batter reaches safety counts towards the total number of strikeouts. Unless in the 0.5 Over/Under strikeout market where the batter reaching safety will be graded as "Yes". Strikeouts do not need to be consecutive.
BS.7.4	Inside-the-park home runs will be graded as "Yes" for home run markets.
BS.7.5	In "Batters to the plate" markets an official plate appearance does not need to be recorded.
BS.7.6	If a player is removed from the game whilst their plate appearance is in progress, the player who replaces them will not count as an additional batter to the plate.
BS.7.7	A base hit where the batter is thrown out stretching is considered as a hit for grading.
BS.7.8	First/Last Home Run markets: Players must be in the starting lineup, or pinch hit before a home run has been hit, for wagers on those players to have action.

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	<p>If a non-listed player is the winner, wagers on all listed qualified players are deemed action.</p>
BS.7.9	<p>Pitch Velocity, Batted Ball Exit Velocity, Home Run Distance markets:</p> <p>All markets will be graded using MLB's Statcast from the MLB website.</p>
BS.7.10	<p>Next Plate Appearance markets:</p> <p>The official ruling made by MLB on what constitutes a plate appearance for a given player will be used for grading purposes when determining whether the plate appearance was recorded.</p> <p>Intentional walks will void the batter's Plate Appearance, Pitch Result, and Pitch Count markets.</p>
BS.7.11	<p>Plate Appearance Result Exact markets:</p> <p>"Reach on Error" includes: on error, failed fielder's choice, and catcher interference.</p> <p>"Inplay Out" includes fielder's choice</p>
BS.7.12	<p>Plate Appearance Result Grouped markets:</p> <p>A base hit where the batter is thrown out stretching grades this market as a "Hit".</p> <p>All wagers on the specific market will be void in the following scenarios: error, failed fielder's choice, catcher interference, and dropped third strike (where the batter safely reaches base).</p>
BS.7.13	<p>Plate Appearance Result Reach Base markets:</p> <p>"Yes" will be graded as the winner if the result of the player's plate appearance ends with that player being safely on any base or reaching home plate (including reaching base in scenarios such as an error or fielder's choice) and the half inning is not over.</p> <p>"Yes" will be graded as the winner when the batter walks and a runner is tagged out to end the inning.</p> <p>"No" will be graded as the winner if the specified player does not score or the result of the player's plate appearance ends with that player not being on base (including scenarios such as the batter recording a hit but being thrown out attempting to stretch a hit into extra bases or a runner being thrown out to end the inning).</p>
BS.7.14	<p>Next Pitch markets:</p> <p>Pitch clock and infield shift violations will not determine any pitch markets. Pitch markets will void for the current batter on an automatic walk. If a balk is called when a pitch is delivered, that pitch will not determine any pitch markets, since it is not an official pitch.</p>
BS.7.15	<p>Pitch Result markets:</p> <p>"Hit by pitch" and "pitch out" are included in the grading for "Ball". "In Play" includes any type of hit (single, double, etc.) in addition to any batted ball which results in an out(s) being recorded.</p> <p>"Reaching on error" and "failed fielder's choice" will be graded as "In Play", with the exception of "catcher interference". If a batter swings and misses or fouls off the pitch and catcher interference is called, the pitch result market will be graded as "Strike/Foul". If a batter hits the ball into play, regardless of whether or not catcher interference is called, "In Play" will be deemed the winning selection.</p>
BS.7.16	<p>Pitch Speed markets:</p> <p>If an official pitch speed is not available for a pitch at the conclusion of the game, all wagers on that market will be deemed void. Official pitch speeds come from the MLB website. Pitch speeds listed on a television broadcast are not considered official.</p>
BS.7.17	<p>Half Inning U/O 0.5 Strikeout markets:</p> <p>A strikeout with a dropped third strike where the batter reaches safely will grade the market as "Over".</p>
BS.7.18	<p>Half Inning U/O 2.5 Strikeout markets:</p>

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	A dropped third strike where the batter reaches safely counts toward the total number of strikeouts. The strikeouts do not need to be consecutive. For example, a dropped third strike where the batter reaches safely, followed by a fly out, followed by two strikeouts, would grade the market as "Over".
BS.7.19	Half Inning Pitches Thrown markets: Balks, automatic balls, and automatic strikes do not count towards pitch count totals for grading.
BS.7.20	Half Inning Batters to the Plate markets: An official plate appearance does not need to be recorded. For example: The first two batters of the inning record outs. The third batter reaches safely. On a 2-0 count to the fourth batter, the runner is caught stealing. The market results as "4" batters to the plate. In the case of a player being removed from the game while their plate appearance is in progress, the player that replaces them will not count as an additional batter to the plate.
BS.7.21	Half Inning Hits markets: A base hit where the batter is thrown out stretching counts as a hit.
BS.7.22	Half Inning Strikeout markets: A dropped third strike where the batter reaches safely counts toward the total number of strikeouts.
Basketball	
Overtime (or equivalent)	
BB.1.1	All markets include Overtime unless stated. Markets that exclude overtime are denoted using phrases such as "Excl. OT".
Abandonment or postponement	
BB.2.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours of its start time.
BB.2.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
BB.3.1	Wagers on full game markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime if applicable, is not completed, unless otherwise stated or the result has already been determined.
BB.6.2	Wagers on period markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
BB.4.1	NBA Regular Season Wins/Matchups: A team must complete at least 80 regular season games for wagers involving that team to have action unless the result has already been determined. Play-in games do not count.
BB.4.2	The Division and Conference winner is graded as announced by the competition governing body.
BB.4.3	The teams that progress to the NBA Championship (or similar) will be deemed the winners of their respective conference.
BB.4.4	To Make Playoffs: The teams that progress to the NBA play-offs will be deemed as winners for grading.
BB.4.5	Series wagers will be deemed void if the stated number of games required to win the series changes (according to the official governing body).
BB.4.6	NCAA Futures: In the event a player or team is not offered for wagering due to state regulations and the market only has one winner (e.g., NCAAF Championship Winner), all wagers on this market will be deemed no action and voided. This does not include wagers that have already been cashed out by the patron and have been graded at a specific cash out price.

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	If any market that has multiple winners (e.g., NCAA regular season Conference Winner, To Make Playoffs) if a non-listed team or selection wins, all wagers are action.
BB.4.7	In-season tournament events do count towards grading team win/total markets, however the In-Season Championship game does not count towards grading.
BB.4.8	Season player props markets will be graded on the official result from the competition governing body. The in-season final does not count towards grading these markets.
BB.4.9	Daily team props markets require all listed teams to play. If any team does not play then all wagers are considered no action and voided.
BB.4.10	Regular Season League Leaders are graded based on rules as per the NBA website.
General market rules	
BB.5.1	Full game and second half markets include overtime for grading purposes, unless stated otherwise.
BB.5.2	For all matches that are played as part of a two-legged tie, where the aggregate score is equal at the end of regulation time in the 2 nd leg, overtime will be included to determine the outcome of 2 nd leg match wagers.
Specific market rules	
BB.6.1	Player Prop wagers are deemed no action and voided if the applicable player does not participate in the event.
BB.6.2	A player is deemed to have participated if they enter the court during the game, or specified time period, as applicable.
BB.6.3	<p>First Field Goal Scorer:</p> <p>Wagers will be deemed no action and voided if the specified player does not start the specified period.</p> <p>While we endeavour to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request. As such, for First Field Goal Scorer markets, if the points are scored by players not listed, all wagers will stand and be graded as if the winning selections were listed.</p>
BB.6.4	Player Prop and statistical markets are graded when the event is final, and when the statistics are available on the official governing body website. Any later changes to these statistics will not result in changing or regrading of these wagers.
BB.6.5	Player Prop markets will be graded including overtime, unless otherwise stated.
BB.6.6	<p>First Basket markets:</p> <p>Wagers will be deemed no action and voided if the specified player does not start the specified period.</p> <p>While we endeavour to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request. As such, for First Basket markets, if the points are scored by players not listed, all wagers will stand and be graded as if the winning selections were listed.</p>
BB.6.7	The "Halftime/Fulltime" or "double result" market excludes overtime.
BB.6.8	"Buzzer Beater" is defined as a legal shot that scores when 0:00 seconds remains on the game clock which results in that team winning the game. Foul shots are excluded for this market.
In-play	
BB.7.1	If the match is not completed on the scheduled date, all wagers will be deemed no action and voided, except for any wagers where the outcome has already been determined at the time of suspension, abandonment, or postponement.
BB.7.2	<p>Possession markets:</p> <p>An offensive rebound during normal play continues a possession.</p> <p>An offensive rebound from a free throw constitutes a new possession.</p> <p>A jump ball where the defensive team gains possession will be graded as "Turnover".</p> <p>Blocked shots that get rebounded by the defensive team will be graded as "Defensive Rebound".</p>

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	<p>Non-shooting fouls that lead to free throws will be graded as "Attempted Free Throw" if they occur during normal play.</p> <p>Non-shooting fouls that lead to free throws during breaks in play will see possession continued.</p> <p>Offensive basket interference will be graded as "Turnover".</p>
BB.7.3	<p>Team/player attempt/type/exact Markets:</p> <p>Wagers on Next Field Goal markets will be graded as void should there be no further field goals scored.</p> <p>Any wagers not graded when a player fouls out, get ejected or is ruled out with injury will be graded as void.</p> <p>In the case of a specific score not occurring in the game, all markets with the incorrect score listed in the market's context will be deemed as void. For example, if a 2-point field goal is changed to a 3-point field goal, the markets with the score reflective of the 2-point field goal will be void.</p>
BB.7.4	<p>Free throw markets:</p> <p>If a free throw is re-attempted due to a violation all wagers are valid on the reattempt.</p>
Football	
Overtime (or equivalent)	
FO.1.1	All markets include Overtime unless stated. Markets that exclude overtime are denoted using phrases such as "Excl. OT"
Abandonment or postponement	
FO.2.1	<p>If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete by the end of the same game week.</p> <p>The NFL game week runs Thursday to Wednesday.</p> <p>The NCAAF game week runs Tuesday to Monday.</p>
FO.2.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
FO.3.1	Wagers on full game markets, including money line, spread line and totals, will be considered as action should there be less than 5 minutes of scheduled play remaining in the 4th quarter.
FO.3.2	Wagers on period markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
FO.4.1	Season markets include the postseason, unless specifically stated otherwise.
FO.4.2	Season Player Prop markets are for the regular season only, unless otherwise stated.
FO.4.3	Player Prop markets wagers will remain regardless of trades between teams.
FO.4.4	If a player takes no part in the season, Season Player Prop wagers on that player will be deemed no action and voided, unless otherwise stated.
FO.4.5	Super Bowl Winner, Conference Winner and Divisional Winner wagers stand regardless of the length of the season provided the official governing body declares a winner.
FO.4.6	AFC/NFC Conference winners are graded based on the teams progressing to the Super Bowl.
FO.4.7	NFL Division Winners are graded based on official competition rules.
FO.4.8	For Regular Season Wins markets, all scheduled matches must be played for wagers to stand, unless the outcome is already known, for example, a team that has 11 wins for the market is under/over 10.5 wins.
FO.4.9	NFL Draft wagers will be graded based upon the official statements on the NFL official website.

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FO.4.10	For NFL Draft position markets, undrafted players will be graded as "over", where applicable.
FO.4.11	Team to get Most/Least/Highest/Lowest such as season wins will be graded as a dead heat in the event of a tie.
FO.4.12	For Last Winless and Last Undeclared markets, dead heat rules apply if multiple teams tie. Wagers are graded based on the NFL Scheduling Week.
General market rules	
FO.5.1	Full game and second half markets consider overtime for grading, unless otherwise stated.
Specific market rules	
FO.6.1	For weekly markets involving multiple games/teams/players, any wagers on games/teams/players that do not participate will be deemed as no action. All other wagers on the market will be graded as normal.
FO.6.2	A player is considered to have participated in an event if they take to the field for at least one snap.
FO.6.3	Field goal yardage will not be considered in grading for total yards gained in a play.
FO.6.4	Player Prop and statistical markets are graded when the event is final, and when the statistics are available on the official governing body website. Any later changes to these statistics will not result in changing or grading of these wagers.
FO.6.5	Defensive Tackles and Tackles+Assists markets will only consider tackles made on defensive plays.
FO.6.6	A sack will be graded as a pass attempt for NFL and as a rush attempt in NCAAF.
FO.6.7	If the defense gains possession and then fumbles back to the offense, turnover will be deemed the result for grading.
FO.6.8	A touchdown scorer is defined as the player in possession of the ball in the end zone and not the player who throws the touchdown.
FO.6.9	An "Octopus" is defined as the same player scoring both a touchdown and a 2-point conversion on the same scoring drive.
FO.6.10	The "Halftime/Fulltime" or "double result" market excludes overtime.
FO.6.11	Game To Be A Scorigami: The market will be settled based on nflscorigami.com. Unless otherwise stated, the market will be settled as a winner if the final score of the game (including overtime), has never happened before in NFL history during the Regular Season and Playoffs including the Super Bowl.
FO.6.12	For markets with Game Clock, settlement is determined by the game clock and when the first touchdown or X point is scored. Games with delayed kickoffs count provided the game is played on the same day. Time recorded using official league's website
In-play	
FO.7.1	<p>Drive result markets:</p> <p>Drives are deemed to have started on the first offensive snap of the ball. Any drives which are completed due to the end of the half or game and do not explicitly result in one of the outcomes listed will be void.</p> <p>Field Goal Attempt is deemed the winning selection if the kicker kicks the ball. Blocked, scored, missed, or returned field goals will all be graded as "Field Goal Attempt". Botched/fake field goals are not considered a field goal attempt.</p> <p>Punt is deemed the winner if the punter kicks the ball. All punts returned for a touchdown will be graded as "Punt".</p> <p>Blocked and muffed returns will be graded as "Punt", and a new drive will begin with the next snap of the ball.</p> <p>If the punt is blocked and results in safety, the market will be graded as "Safety".</p> <p>When a blocked punt or field goal results in a touchdown, the markets will result based on the conclusion of the offensive team's drive (i.e., punt or field goal, in these examples).</p>

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FO.7.2	<p>Drive Crosses X Yard Line: In the scenario of time expiring, the final spot of the ball (which could either be the forward progress of the ball during a play while time expires or the line of scrimmage of a play that is not run due to time expiring) will be considered the final yard line, for grading purposes. If the ball is fumbled, the yard line where the fumble occurs will be considered the final yard line.</p> <p>Punts and Field Goal Attempts do not count for this market.</p>
FO.7.3	New Set of Downs This Drive: A new first down achieved by pass, rush, or penalty will grade the market as "Yes". An offensive touchdown will grade the market as "Yes".
FO.7.4	Sack This Drive: In college football, intentional grounding will grade the market as "Yes". In the NFL, intentional grounding will not grade the market.
FO.7.5	Fourth Down Conversion This Drive: First downs earned by a penalty do not count as a fourth down conversion.
FO.7.6	Player to Score a Touchdown This Drive: The market will grade as the player who is credited with the touchdown according to official statistics. For example, on a receiving touchdown, the winning selection will be the player who caught the pass, rather than the passing player.
FO.7.7	Player Catch a Pass This Drive: The player must have officially recorded a reception on the drive. All bets are action regardless of if player takes the field during the drive.
FO.7.8	20+ Yard Passing/10+ Yard Rushing/20+ Yard Play This Drive: The yardage statistic of plays is officially calculated after penalty assessment, but without the penalty yardage. For example, a 12-yard pass play with a 10-yard penalty tacked on only counts for 12 yards, not 22. Also, a 12-yard rush with penalty assessment 8 yards from the line of scrimmage, only counts for 8 yards, not 12.
FO.7.9	Where a post-snap penalty makes the specified play number incorrect, all wagers will be deemed no action and voided.
FO.7.10	<p>Situational markets:</p> <p>"Situational Extra Point Make" - If no attempt is made wagers will be deemed no action and voided. Missed and blocked extra points will be graded as "No".</p> <p>"Situational Two Point Conversion" - If no attempt is made wagers will be deemed no action and voided. If there is a pre-snap penalty the grading will be based on the outcome following the snap. If there is a post-snap penalty, then wagers will be deemed no action and voided.</p> <p>"Situational Kick-off Touchback" - If the kick-off is returned or kicked out of bounds wagers will be graded as "No".</p> <p>"Situational Field Goal Make" - If no attempt is made, if there is a fake field goal or botched snap then wagers will be deemed no action and voided.</p>
FO.7.11	<p>Player Prop Markets:</p> <p>"Player Next Catch" - If the player does not make another rushing attempt after the specified drive/play then wagers will be deemed no action and voided. A penalty that negates a rushing attempt will see the market continue.</p> <p>"Player Next Carry" - If the player does not make another reception after the specified drive/play then wagers will be deemed no action and voided. A penalty that negates a reception will see the market continue.</p> <p>"Player Next Pass Attempt Completion" - Interceptions will be considered as "Incomplete" for grading. If the player does not make another pass attempt, then wagers will be deemed no action and voided.</p> <p>"Player Catch Next Pass" - If a pass is caught by a player other than those in the named selections then wagers will be graded as "Other". If no player on the team has another reception after the specified drive/play then wagers will be deemed no action and voided.</p>
Ice Hockey	
Overtime (or equivalent)	
HO.1.1	All markets include Overtime unless stated. Markets that exclude overtime are denoted using phrases such as "Excl. OT"

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Abandonment or postponement	
HO.2.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours of its start time.
HO.2.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
HO.3.1	Wagers on full game markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
HO.3.2	Wagers on period markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
HO.4.1	NHL Regular Season Points/Matchups/Division Winner/Presidents Trophy: A team must complete at least 80 regular season games for wagers involving that team to have action, unless the result has already been determined.
HO.4.2	NHL To Win Conference: The teams that progresses to the Stanley Cup Final will be deemed the winners of their respective conferences.
HO.4.3	Wagers to Make Playoffs will be “no action” and refunded if the league does not begin a post-season for that respective season. If the number of teams that make the postseason change during the season, wagers on “To Make Playoffs” markets will be deemed no action and voided.
HO.4.4	All Awards markets are action unless the award is not awarded, in which case, wagers will be deemed no action and refunded. Players must play in at least one regular season game to have action.
HO.4.5	All NHL Regular Season Player Specials are graded based on official results, statistics and scores recorded by the league. Unless otherwise stated, all wagers stand regardless of season length. All wagers have action regardless of the number of games played by the named player as long as the named player is in the official starting line-up of at least a single game after the time the wager was placed.
HO.4.6	Series wagers will be deemed void if the stated number of games required to win the series changes (according to the official governing body).
HO.4.7	For monthly player Proposition specials involving players from different teams and/or events, all players listed in the specials market must play in the stated month for wagers to be declared action. If any listed player in the specials market does not play in the stated month, all wagers will be deemed no action and voided. Markets will be graded based on all regular season games that are played within the stated calendar month. If any games within such calendar month are postponed to another calendar month, all wagers will be deemed no action and voided, unless the result of the wager has already been determined.
General market rules	
HO.5.1	Period markets do not include overtime (or equivalent) and shootouts, unless otherwise stated in the market description.
HO.5.2	Player Prop markets do not include shootouts goals unless otherwise stated.
HO.5.3	In the event of a shootout, the winning team is awarded one goal, which is also considered in the final score for all full game markets. This does not apply to markets which state overtime is not included or regular season NCAA games.
Specific market rules	
HO.6.1	Proposition wagers for players will be deemed no action and voided if the applicable player does not participate in the applicable event. A player is deemed to have participated if they have spent time on the ice, as determined by the governing body.
HO.6.2	Any statistically dependent markets (such as player markets) are graded when the event is completed, and when the necessary statistics are available on the relevant governing bodies official website, or that of the official statistics provider of the league.

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	Any subsequent changes after these markets are graded will not result in a regrading of wagers.
HO.6.3	A player is deemed to have participated in an event if the player takes the ice during the game.
HO.6.4	For Goalie Proposition wagers the applicable player must start the game, or the wager will be deemed no action and voided.
HO.6.5	For “First Scorer” and “Last Scorer” markets, goals scored in regulation time and overtime are considered for grading. Wagers stand on any player that has participated in the event.
HO.6.6	For the following rules related to player markets only, we define an Attacking Goal to be a goal that is not deemed to be an Own Goal, i.e., a goal scored by a player of the scoring team.
HO.6.7	Own Goals, in competitions where they are awarded, do not count towards the grading of player markets. Player markets will be graded on the next Attacking Goal player to score in the match. For example, if the first goal of the match is an own goal, and the second goal of the match an Attacking Goal, then both the "First Goalscorer" and "Second Goalscorer" markets will be graded based on the scorer of the second goal.
HO.6.8	For the “Last Goalscorer” market, should the last goal be an own goal, the market will be graded on the scorer of the previous Attacking Goal player to score in the match. For example, if the last goal of the match where there are three goals is an own goal, the “Last Goalscorer” market will be graded based on the scorer of the second goal of the match (assuming that was an Attacking Goal).
HO.6.9	For all other wagers involving goals, own goals will count, unless otherwise stated.
HO.6.10	“Goalie Shutout” is credited to a goaltender who successfully stops the other team from scoring during the entire game. The goaltender must play the entire game.
In-play	
HO.7.1	If the match is not completed on the scheduled date, all wagers will be deemed no action and voided, except for any wagers where the outcome has already been determined at the time of suspension, abandonment, or postponement.
HO.7.2	Next Goal markets definitions: Even strength - when every team has the same number of players on the ice; Power-play - a goal is considered to be a power-play goal if the team with the numerical advantage scores; Short-handed - a goal is considered to be a short-handed goal if the team with the numerical disadvantage scores; Penalty shot - a penalty shot is considered to be a goal, if converted.
HO.7.3	Where no further goals are scored in a match, the “Next Scorer” market available will be graded as a winning selection for “Neither”.
HO.7.4	In time-based markets the periods run from :00 to :59, as applicable. For example, in the market “Goal scored in the first 10 minutes” the period starts at 00:00 and ends at 09:59.
HO.7.5	Next Goal markets: Penalty shot goals in regulation and overtime will result as "Even Strength" regardless of if the team was already on a power play or shorthanded at the time of the penalty shot being awarded. Penalty shootout goals (after regular season overtime) do not count toward these markets.
HO.7.6	Next Power Play markets: If multiple power play markets are created before a power play occurs, the outcome of the next applicable power play will be used to grade all previously ungraded markets. For example, if markets are created at 0-0, 1-0, 1-1, 2-1 then the first power play (home team) occurs and a home goal is scored, all of those Next Power Play Result and Team Next Power Play Result - Home markets will be graded as "Goal". If multiple power play markets are created before a power play occurs, the outcome of the next applicable power play will be used for grading all previously ungraded markets. For example, if markets are created at 0-0, 1-0, 1-1, 2-1 then the first power play (home team) occurs and a home goal is scored, all of those Next Power Play Result and Team Next Power Play Result - Home markets will be graded as "Goal". A power play does not have to last the full duration for applicable markets to be graded. For example, if the Home Team has 40 seconds remaining on a minor power play, then commits a penalty to bring the

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	<p>skaters to 4-on-4, the market will be graded as "No Goal". If a team is on a power play and the game ends, the market will be graded according to what occurred during the abbreviated power play.</p> <p>Double minor penalties count as two power plays. For example, if a goal is not scored during the first two-minute power play of a double minor then one is scored during the second two-minute power play, an applicable market would be graded using the first power play, which was "No Goal". However, if a goal is scored during the first power play of a double minor, new markets will create on the goal with the updated score and, if applicable to the team on power play, will be graded using the outcome of the second power play.</p> <p>Penalty shots occurring at even strength do not count as power plays.</p> <p>Penalties assessed at the end of the game (no time left) that would count as power plays if there was any time on the clock, do not count as power plays. Any markets that would have applied to this power play will be deemed no action and void.</p>
HO.7.7	<p>Next Shot On Goal Team markets:</p> <p>Penalty shots on goal (apart from shootouts) count as shots on goal.</p>
Soccer	
Overtime (or equivalent)	
SO.1.1	<p>Wagers are graded by the result at the end of Regulation Time, plus any Stoppage Time that is played. Extra Time/Overtime (or equivalent) and/or Penalty Shootouts are not considered, unless otherwise stated.</p>
Abandonment or postponement	
SO.2.1	<p>If an Event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be fully determined will be deemed no action if the event does not resume and complete within 48 hours of its scheduled start time.</p>
SO.2.2	<p>If the scheduled venue for an Event is changed, then wagers will still be valid and deemed action.</p>
Incomplete events	
SO.3.1	<p>Wagers on match markets that have not been determined will be declared no action if the full duration of the match, generally 90 minutes, is not completed.</p> <p>Wagers on 1st half markets that have not been determined will be declared no action if the full duration of the 1st half, generally 45 minutes, is not completed.</p> <p>Wagers on 2nd half markets that have not been determined will be declared no action if the full duration of the 2nd half, generally 45 minutes, is not completed.</p>
Futures	
SO.4.1	<p>Futures wagers are graded in accordance with the official result of the relevant governing body. If no such result is declared, wagers will be deemed no action and stakes will be refunded. Any subsequent challenges, appeals or other changes to the determination of the governing body's results will not be recognized and wagers will not be regraded.</p>
SO.4.2	<p>League Winner wagers are graded on which team will place highest in the league table at the end of the season, including any method used to determine the season winner such as tiebreaker matches or play-offs, as per official competition rules, and unless specifically stated otherwise.</p>
SO.4.3	<p>In the case that two or more teams are announced as joint winners, then Dead Heat rules will apply, unless stated otherwise.</p>
SO.4.4	<p>Top league goalscorer wagers are graded on the player who scores the most goals in that competition or league. Goals scored in additional matches, such as tie-break matches or play-offs, do not count unless specifically stated otherwise. Own goals do not count. Grading will be determined as per official competition rules and results, and as such, in the case of two or more players being determined as joint winners, then Dead Heat rules will apply.</p>

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SO.4.5	<p>Relegation betting wagers are graded on which teams are relegated at the end of the season, including any method used to determine relegation such as tie-break matches or play-offs, unless otherwise specifically stated in the Market description.</p> <p>If a team is removed from the indicated league before the season begins, then all wagers on that market are deemed no action and voided and a new Market will be created.</p> <p>If a team is expelled from the indicated league by the governing body during the season, before all games are completed, then wagers on that team will be deemed no action and refunded.</p> <p>Any points deduction imposed on a team is included for relegation purposes.</p>
General market rules	
SO.5.1	The home team is listed first on soccer events.
SO.5.2	If any team starts a match with fewer than the permitted number of players playing, usually 11, then wagers on that match will be deemed no action and refunded.
SO.5.3	For team and player statistics markets such as "shots" or "shots on goal", grading will be based on statistics published by Opta or WhoScored.
SO.5.4	Corner markets are graded based on the number of corners taken in the match, not the number that are awarded. For example, if a corner is awarded, but the match moves to full time before the corner is taken, this corner will not count for grading purposes.
Specific market rules	
SO.6.1	<p>While we endeavour to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request.</p> <p>As such, for player markets ("First Goalscorer", "Last Goalscorer", "Anytime Goalscorer" and similar), if goals are scored by players not listed, all wagers will stand and be graded as if the winning selections were listed.</p>
SO.6.2	For the following rules related to player markets only, we define an Attacking Goal to be a goal that is not deemed to be an Own Goal, i.e., a goal scored by a player of the scoring team.
SO.6.3	<p>Own Goals do not count towards the grading of player markets. Player markets will be graded on the next Attacking Goal player to score in the match.</p> <p>For example, if the first goal of the match is an own goal, and the second goal of the match an Attacking Goal, then both the "First Goalscorer" and "Second Goalscorer" markets will be graded based on the scorer of the second goal.</p>
SO.6.4	<p>For the "Last Goalscorer" market, should the last goal be an own goal, the market will be graded on the scorer of the previous Attacking Goal player to score in the match.</p> <p>For example, if the last goal of the match where there are three goals is an own goal, the "Last Goalscorer" market will be graded based on the scorer of the second goal of the match (assuming that was an Attacking Goal).</p>
SO.6.5	For the "First Goalscorer" market, wagers made on players who had not participated in the match prior to the first Attacking Goal being scored, will be deemed no action and voided, as those players had not had the opportunity to score the first goal.
SO.6.6	For "Last Goalscorer" and "Anytime Goalscorer" markets, any player who participates within the event will be considered as having action, as they had had the opportunity to score that goal. Wagers made on players who did not participate in the match will be deemed no action and voided.

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SO.6.7	<p>We define other statistical based player markets (e.g., player shots, tackles, passes, assists, star player) to be Player Props.</p> <p>Unless otherwise stated, for Player Prop markets, if the player does not start the event, then wagers are deemed no action and voided, regardless of what that player goes on to do if coming on as a substitute.</p>
SO.6.8	<p>Player Prop markets are limited to Regulation Time, plus any Stoppage Time that is played. Player prop markets do not include Extra Time/Overtime (or equivalent) and/or Penalty Shootouts, unless otherwise stated in the Market description.</p>
SO.6.9	<p>Player to score and team to win markets are deemed action if the player participates in the event, for any time period. Wagers made on selections where the player did not participate in the match, will be deemed no action and voided.</p>
SO.6.10	<p>"To qualify" and "Method of Victory" markets are offered in the case of a single event, or the second leg of a two-event tie. These markets will be graded based on the aggregate score of all events within the tie, based on official competition rules and results.</p>
SO.6.11	<p>"Woodwork" markets relate to whether the frame of the goal is hit during active play. Instances where the ball hits the woodwork which result directly in a goal, do not count as the woodwork being hit.</p> <p>Team woodwork markets related to whether the frame of the goal is hit by that team during active play. A team woodwork will still count if it is the defending team hitting its own woodwork with the ball. Instances where the ball hits the woodwork which result directly in a goal, do not count as the woodwork being hit.</p>
SO.6.12	<p>Quickest Goal markets are determined by the team to score the quickest goal relative to each team's actual kickoff time. Settlement is determined by the minute in which the first goal is scored. Matches with delayed kickoffs count providing the match is played the same day. Dead Heat Rules apply.</p>

Tennis

Abandonment or postponement

TE.2.1	<p>If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 7 days of its start time.</p>
TE.2.2	<p>If the scheduled venue, playing surface or indoor to outdoor conditions of an event is changed, then wagers will still be valid and deemed action.</p>

Incomplete events

TE.3.1	<p>Money Line or Match Winner markets will be considered as action after the completion of the first set, with the player progressing to the next round, lifting the trophy in the case of a final, or being awarded the win in the case of a round robin tournament being deemed the winner. For these markets only, wagers on the withdrawing player (ie, the player that does not progress to the next round or win the tournament) will be voided.</p>
TE.3.2	<p>In the case of a player withdrawal or disqualification, all other markets (except Money Line or Match Winner) will be deemed no action and voided unless the outcome of the market is already determined.</p> <p>In the case of a withdrawal or disqualification at a point in time where the current score of the event has not directly determined the outcome of a market, but where the only possible eventual scores would determine a specific selection would be graded as a winner, then that market will be deemed as action, and the market graded on that result. For example, if a withdrawal happened at 3-3 in the first set, the "O/U 8.5 first set games" market would be graded with Over 8.5 games as the winning selection, and Under 8.5 games as the losing selection, as the minimum number of games that could be played if the withdrawal had not have happened, is 9.</p>

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	A market will be deemed no action and refunded if a winning selection cannot be determined, even if some selections are no longer theoretically possible (e.g. Player retires at 1-1 in sets, all 'Correct Score - Best of 3 Sets' wagers are refunded, including 2-0 scorelines).
Futures	
TE.4.1	Future player wagers will be deemed no action and voided if the player does not start the event, or if a player withdraws from the event without further action from the time at which the wager is struck.
TE.4.2	All Futures wagers are considered action if the player starts a match, whether they finish the match or not.
General market rules	
TE.5.1	If the length of an event is altered prior to starting, all wagers will be deemed no action and voided.
TE.5.2	If penalty points are awarded by the umpire, all wagers will stand.
TE.5.3	In a doubles match where a player is replaced by another player, all wagers will be deemed no action and voided.
TE.5.4	If a penalty game is awarded by the umpire, all wagers on that game will be deemed as void, unless the outcome of the market is already determined.
Specific market rules	
TE.6.1	If a match is decided by a Champions Tiebreak, this is considered the final set of the match. Set winner wagers will be graded in favour of the winner of the Champions Tiebreak and Set score wagers will be graded with the Champions Tiebreak counting as the final set.
TE.6.2	The Champions Tiebreak will count as one game for the purpose of total games or game spread wagers.
TE.6.3	For head-to-head tournament wagers, all players listed must start the specified events for the wagers to be considered as action.
TE.6.4	Markets referring to Player Nationality are determined by the nationality as listed by the sport's governing body.
TE.6.5	Markets referring to player "seeding" and "ranking" are determined as listed by the sport's/tournament's governing body.
Boxing	
Abandonment or postponement	
BX.2.1	If an event is abandoned, cancelled, or postponed without a new date for the fight, then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete by the end of the next calendar day. Where a fight is rescheduled with a new date announced wagers will carry over the amended date.
BX.2.2	If either fighter is replaced, then all wagers will be deemed no action and voided.
BX.2.3	For unconfirmed fights, that we may offer from time to time, should these fights not be completed by the end of the next calendar year from when the markets are offered, then they will be deemed no action and voided.
Incomplete events	
BX.3.1	If no winner of the fight is declared, wagers will be deemed no action and voided with the exception of markets where the outcome is already determined.
BX.3.2	All wagers are considered as action, regardless of the scheduled length of the fight once the fight has officially started.
BX.3.3	If the scheduled number of rounds in a fight is changed then all wagers on Fight Winner and/or Fight Result markets will stand and all other markets will be deemed as no action and voided.
General market rules	
BX.5.1	Wagers are considered as action regardless of any changes in weight class, scheduled length of the fight, or championship sanction, unless otherwise specified.
BX.5.2	If a fight ends in an official result of "No Contest" or "Technical Draw", wagers will be deemed no action and voided, with the exception of markets where the outcome is already determined.
BX.5.3	A full round is defined as one in which there is an official conclusion to the specified round.

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BX.5.4	If a fighter is counted out or the fight is stopped prior to the conclusion of a round, the round is not considered as a full round for grading.
BX.5.5	A half-round is defined as the full round length divided by 2. If a fight ends at exactly the half-round time, then the "Over" selection in the relevant Total Rounds market is considered the winning selection.
BX.5.6	KO includes knockout, technical knockout, disqualifications, or any other stoppage initiated by the fighter, fighters' corner, or referee.
Specific market rules	
BX.6.1	A Points wager requires the fight going to the judge's scorecards to determine the winner, including technical decisions.
BX.6.2	A Draw wager requires a draw to be declared by the judges or a draw due to a technical stoppage.
BX.6.3	"To Be Champion On X Date" markets: Interim titles do not count for grading purposes. If a division has a vacant champion on the selected date, all wagers will be deemed no action and voided.
BX.6.4	If either fighter is unable to continue or the referee and/or doctor stops the fight in between rounds, the fight will revert to the last full round.
BX.6.5	Fight Winner/Fight Result markets: If the outcomes of the market do not include a Draw, but the fight is declared as a draw, then wagers on both fighters will be voided.
BX.6.6	How long will the fight last markets: Minutes: This market is offered in increments of 1 minute, starting from 0.5 (i.e. over/under 0.5, 1.5, 2.5 minutes, etc). Where a fight ends with the official clock showing exactly 30 seconds past a minute (e.g. 0:30, 1:30, 2:30), it will be deemed a completed half-minute for the purposes of this market, and the fight considered to have progressed to the next half-minute. For example, where a fight ends at exactly 3:30 in the first round, a selection on the fight lasting over 3.5 minutes will be graded as a winner, and a selection on under 3.5 minutes will be a loser. Rounds: This market is offered in increments of 1 round, starting from 0.5 (i.e. over/under 0.5, 1.5, 2.5 rounds, etc). Where a fight ends with the clock at the exact halfway point of a round (e.g. 2:30 for 5-minute rounds), it will be deemed a completed half-round for the purposes of this market, and the fight considered to have progressed to the next half-round. For example, where a fight with 5-minute rounds ends at exactly 2:30 on the clock in the second round, a selection on the fight lasting over 1.5 rounds will be graded as a winner, and a selection on under 1.5 rounds will be a loser.
BX.6.7	Fight to go the distance markets: A fighter is considered to have gone the distance for the purposes of grading when he/she has fought through all the scheduled rounds.
BX.6.8	Method of Victory markets: Knockout (KO) is when the boxer fails to stand up after a 10 count. Technical Knockout (TKO) is the 3 knockdown rule or if the referee steps in. TKO is declared when the referee decides, during a round, that a fighter cannot safely continue the match for any reason. By Decision is on the scorecard points between the judges. Draw is a scorecard draw.
MMA	
Abandonment or postponement	

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MM.2.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete by the end of the next calendar day.
MM.2.2	If either fighter is replaced, then all wagers will be deemed no action and voided.
MM.2.3	For unconfirmed fights, that we may offer from time to time, should these fights not be completed by the end of the next calendar year from when the markets are offered, then they will be deemed no action and voided.
Incomplete events	
MM.3.1	If no winner of the fight is declared, wagers will be deemed no action and voided with the exception of markets where the outcome is already determined.
MM.3.2	All wagers are considered as action, regardless of the scheduled length of the fight once the fight has officially started.
MM.3.3	If the scheduled number of rounds in a fight is changed then all wagers on Fight Winner and/or Fight Result markets will stand and all other markets will be deemed as no action and voided.
General market rules	
MM.5.1	Wagers are considered as action regardless of any changes in weight class, scheduled length of the fight, or championship sanction, unless otherwise specified.
MM.5.2	If a fight ends in an official result of "No Contest" or "Technical Draw", wagers will be deemed no action and voided, with the exception of markets where the outcome is already determined.
MM.5.3	A full round is defined as one in which there is an official conclusion to the specified round.
MM.5.4	If a fighter is counted out or the fight is stopped prior to the conclusion of a round, the round is not considered as a full round for grading.
MM.5.5	A half-round is defined as the full round length divided by 2. If a fight ends at exactly the half-round time, then the "Over" selection in the relevant Total Rounds market is considered the winning selection.
MM.5.6	KO includes knockout, technical knockout, disqualifications, or any other stoppage initiated by the fighter, fighters' corner, or referee.
MM.5.7	A win by submission is not considered as a KO/TKO in MMA.
MM.5.8	Submission includes a referee stoppage due to tap out, referee stoppage due to technical submission, and fighter verbal submission.
Specific market rules	
MM.6.1	A Points wager requires the fight going to the judge's scorecards to determine the winner, including technical decisions.
MM.6.2	A Draw wager requires a draw to be declared by the judges or a draw due to a technical stoppage.
MM.6.3	"To Be Champion On X Date" markets: Interim titles do not count for grading purposes. If a division has a vacant champion on the selected date, all wagers will be deemed no action and voided.
MM.6.4	If either fighter is unable to continue or the referee and/or doctor stops the fight in between rounds, the fight will revert to the last full round.
MM.6.5	Submission markets: A submission includes a referee stoppage due to tap out, referee stoppage due to technical submission, and fighter verbal submission (includes verbal submission due to strikes).
MM.6.6	Fight Winner/Fight Result markets: If the outcomes of the market do not include a Draw, but the fight is declared as a draw, then wagers on both fighters will be voided.
MM.6.7	How long will the fight last markets:

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	<p>Minutes: This market is offered in increments of 1 minute, starting from 0.5 (i.e. over/under 0.5, 1.5, 2.5 minutes, etc). Where a fight ends with the official clock showing exactly 30 seconds past a minute (e.g. 0:30, 1:30, 2:30), it will be deemed a completed half-minute for the purposes of this market, and the fight considered to have progressed to the next half-minute. For example, where a fight ends at exactly 3:30 in the first round, a selection on the fight lasting over 3.5 minutes will be graded as a winner, and a selection on under 3.5 minutes will be a loser.</p> <p>Rounds: This market is offered in increments of 1 round, starting from 0.5 (i.e. over/under 0.5, 1.5, 2.5 rounds, etc). Where a fight ends with the clock at the exact halfway point of a round (e.g. 2:30 for 5-minute rounds), it will be deemed a completed half-round for the purposes of this market, and the fight considered to have progressed to the next half-round. For example, where a fight with 5-minute rounds ends at exactly 2:30 on the clock in the second round, a selection on the fight lasting over 1.5 rounds will be graded as a winner, and a selection on under 1.5 rounds will be a loser.</p>
MM.6.8	<p>Fight to go the distance markets:</p> <p>A fighter is considered to have gone the distance for the purposes of grading when he/she has fought through all the scheduled rounds.</p>
MM.6.9	<p>Method of Victory markets:</p> <p>Knockout (KO) is when a fighter is deemed to have lost consciousness as a result of legal strikes.</p> <p>Technical Knockout (TKO) includes when the referee steps in to stop the fight because he judges that the fighter is no-longer able to actively defend themselves or the fighter cannot safely continue the fight for any reason.</p> <p>By Decision is on the scorecard points between the judges.</p> <p>By submission is when a fighter submits which leads to a defeat.</p> <p>Draw is a scorecard draw.</p>
Golf	
Abandonment or postponement	
GF.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 8 days of the official start.
Incomplete events	
GF.2.1	If a tournament is reduced from the scheduled number of holes, wagers on the outright market will be graded according to the official result. Any wagers accepted after the final shot is played will be deemed no action and voided.
GF.2.2	Where an event is scheduled to play across multiple venues, for example the Alfred Dunhill Links Championship, all venues must have play according to the scheduled format for wagers to be considered as action.
Futures	
GF.3.1	Futures wagers will be deemed no action and voided if the player does not start the event.
GF.3.2	All Futures wagers are considered action if the player tees off on one hole of the tournament or round, whether they finish the tournament or not.
GF.3.3	Markets graded on the official result of the governing body. Amendments can be made for any corrections to scores up to 24 hours after the initial grading of the market.
General market rules	
GF.4.1	The official result for the player who wins the trophy will stand for grading.
GF.4.2	Dead heat rules apply in situations where official results do not separate the finishing order of players, for example "Round Leader", "Top 5", "Top 10", "Top 20" markets.
GF.4.3	For tournaments that use the "Stableford" scoring method, the player(s) with the highest points score will be deemed the winner of that hole, round, or tournament, as per official tournament rules.

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GF.4.4	If a tournament is shortened and some holes are played which do not contribute to the final result, all wagers placed after the last official shot will be deemed no action and void, except for wagers on markets which have already been determined.
GF.4.5	If a period of scoring is reset by the tournament officials, all wagers placed after the last official action will be deemed no action and void except on markets which have already been determined.
Specific market rules	
GF.5.1	<p>Tournament head-to-head:</p> <p>Markets will be graded based on the official score published by the governing body applicable.</p> <p>Markets will be deemed no action and voided if a player involved does not start the event or specified round.</p> <p>Players are considered as action if they tee-off on the first hole of the event or specified round.</p> <p>If a player continues to play after their opponent is no longer in the tournament the player playing the most holes win the head-to-head wager.</p> <p>Players involved in 54-hole (or higher) wagers must complete 18 holes, or the wager will be deemed no action and voided.</p> <p>If the tournament is extended to a play-off, the winner of the play-off is graded as the winner in the head-to-head.</p> <p>If the play-off involves more than 2 players, the player who progresses furthest in the play-off is graded as the winner.</p>
GF.5.2	18-hole wagers (2-balls and 3-balls): all listed players must start the round for wagers to stand, else the markets will be considered no action and void.
GF.5.3	<p>In the “Betting without” market, should the player that wins the tournament be the named player, the player finishing second in the tournament will be graded as the winner.</p> <p>Should two or more players finish second in the tournament, dead heat rules will apply.</p> <p>Should the tournament be concluded in a playoff with three or more players, where the named player wins the tournament, then the player finishing in the highest position as per official classification will be graded as the winner of this market, with dead heat rules applying.</p>
GF.5.4	<p>Group betting markets:</p> <p>If a player does not start the round/hole all wagers on markets conditional to that player will be deemed no action and voided.</p>
GF.5.5	<p>Hole-by-hole markets:</p> <p>Any player or team withdrawing or being disqualified having played a stroke on that hole will be graded as a loser provided at least one other player completes the hole.</p> <p>If any player or team does not play a stroke on the hole, all wagers will be deemed no action and voided.</p> <p>Markets are graded on completion of the hole and any subsequent penalties or disqualification will not count for grading purposes.</p>
GF.5.6	<p>Hole-in-one markets:</p> <p>Should the tournament be reduced to 36 holes or fewer, then all wagers on this market will be deemed as no action and voided, unless already determined.</p> <p>In a specified player to make a hole-in-one market, that player must tee off for wagers to stand.</p>
GF.5.7	Hole markets:

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	<p>All wagers will stand, irrespective of whether the players play in the same group together or not.</p> <p>If a player does not start the hole, all wagers on that player will be deemed no action and void.</p> <p>If a player does not complete a hole, all wagers on the hole are deemed no action and void, except markets which have already been determined.</p> <p>Markets are graded on the completion of the round/hole, and any subsequent penalties imposed by the tour will not be used for regrading.</p>
GF.5.8	<p>Shot markets:</p> <p>All wagers will stand, irrespective of whether the players play in the same group together or not.</p> <p>If a player does not start the round all wagers on that player will be deemed no action and void.</p> <p>If a player does not complete a hole, all wagers on the hole are deemed no action and void, except markets which have already been determined.</p> <p>Markets are graded on the completion of the round/hole, and any subsequent penalties imposed by the tour will not be used for regrading.</p>
<h2>Athletics</h2>	
AT.1.1	<p>All wagers will be graded based upon the final standings published by the official governing body of the event.</p> <p>In the case of participants being tied, any tie-break rules used by the official governing body will be used for grading.</p>
AT.1.2	<p>If the two participants in a head-to-head market take part in different heats, all wagers will be deemed no action and voided. Unless there is a later stage of the event in which both participants do compete directly against one another.</p>
AT.1.3	<p>A disqualification for infringement of starting will see the participant deemed as active and wagers on that participant will be graded as losers.</p>
AT.1.4	<p>If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.</p>
AT.1.5	<p>If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.</p>
AT.1.6	<p>"World Record" betting will be graded as per official results and timings.</p>
<h2>Australian Rules Football</h2>	
AU.1.1	<p>Wagers are graded by the result at the end of Regulation Time, unless otherwise stated. Any Overtime (or equivalent) that is played does not count for grading unless specifically stated.</p>
AU.1.2	<p>If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.</p>
AU.1.3	<p>If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.</p>
AU.1.4	<p>Wagers on full game Markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play is not completed, unless otherwise stated or the result has already been determined.</p>
AU.1.5	<p>Wagers on period Markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.</p>
AU.1.6	<p>For all Outright and Tournament Markets, wagers will be deemed no action and voided if the officially scheduled number of games are not completed, unless the result has already been determined.</p> <p>Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers.</p> <p>Any subsequent disqualifications or changes in placings, will not affect wagers.</p>

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Badminton	
BD.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
BD.1.2	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
BD.1.3	All wagers will be graded in accordance with official event rules and classifications.
BD.1.4	In the case of a withdrawal before an event begins all wagers will be deemed no action and voided.
BD.1.5	In the event of any change in the format of an event, for example, the number of games required to win, all spread and totals markets will be deemed as no action and voided.
Beach Volleyball	
BV.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
BV.1.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
BV.1.3	Wagers on full game Markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
BV.1.4	Wagers on period Markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
BV.1.5	For all Outright and Tournament Markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined. Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
BV.1.6	Golden set is not considered for grading.
BV.1.7	Official points deductions will be considered for wagers where the market has not been determined. Markets which have been determined will not consider later points deductions.
Bowling	
BW.1.1	All wagers will be graded in accordance with official event rules and classifications.
BW.1.2	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
BW.1.3	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Cricket	
Abandonment or postponement	
CR.1.1	If a match is cancelled and not played within 48 hours of the original official starting time, then all wagers will be deemed no action and voided.
CR.1.2	If a series is postponed, for any reason, before the scheduled number of games is played, then the team ahead at the time of postponement will be considered as the winner for grading. Wagers on "Correct Score" will be deemed no action and voided should a postponement occur.
Incomplete events	
CR.2.1	At least one ball must be bowled for wagers to stand. Wagers will be graded based on official competition rules with any undetermined wagers being considered as no action and voided if the official competition rules state no result to the event.

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	<p>The exception to this is on any occasion where a “bowl-out” or coin toss is used to determine the official winner of an event, in which case any undetermined wagers at this point will be considered no action and voided.</p> <p>For any individual innings market for Limited Over matches, for example T20 and ODI, a minimum of 90% of the entire overs allocated for the innings at the time that the wager was accepted must be played for wagers to be deemed to have action, unless the innings reaches a natural conclusion in which case wagers will have action.</p>
General market rules	
CR.3.1	<p>Money line wagers will be graded on the official result of the match.</p> <p>If a match is officially declared as a "no result", all wagers will be deemed as no action and voided.</p> <p>If the match is affected by external factors (such as weather) wagers will be graded based on the official competition rule that is relevant (this includes matches where the Duckworth Lewis Method is used, or where the scheduled number of innings is officially reduced).</p>
CR.3.2	<p>If the result of a Test Match, First Class Match, or any other 3,4- or 5-day match is a tie (all innings are complete and scores are equal), the Money Line or Match Winner market will be declared no action and wagers voided.</p> <p>If the result of a Limited Overs match (e.g., T20 or ODI) match is a tie, and official competition rules do not determine a winner, then Dead Heat rules are applied to wagers.</p> <p>If a winner is determined by official competition rules, such as a Super Over or Eliminator Over, then this will be considered for grading purposes.</p>
Specific market rules	
CR.4.1	<p>Method of Next Dismissal:</p> <p>Grading is based on the method of the next dismissal of either team.</p> <p>If either batsman retires after the wager is placed, the wager continues to the next dismissal.</p> <p>If there is no further dismissal after the wager is placed and before the innings close, then the wager is deemed no action and voided.</p>
CR.4.2	<p>Fall of Next Wicket:</p> <p>Grading is based on the total innings runs a team has scored at the fall of the specified wicket. If either batsman retires after the wager is placed, the wager continues to the next fall of wicket.</p> <p>If there is no further dismissal before the innings close, then wagers will be graded based on the total number of innings runs at the close of innings.</p> <p>All open wagers will be voided if 50 full overs are not bowled, unless one team has won, is dismissed, or declares prior to that point.</p>
CR.4.3	<p>Top Batsman:</p> <p>Grading is determined by the batsman with the highest individual score in the specified innings.</p> <p>If a batsman retires and does not resume his innings, his score will stand.</p> <p>Wagers placed on any player who is not named in the starting eleven will be deemed no action and voided.</p> <p>Wagers placed on any player in the starting eleven stand, whether they bat or not.</p> <p>A minimum of 90% of the entire overs allocated for the innings at the time that the wager was accepted must be played for wagers to be deemed to have action unless the innings reaches a natural conclusion in which case wagers will be deemed to have action.</p>

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	<p>If two or more players tie as Top Batsman, Dead Heat rules apply.</p> <p>Runs scored in Super Overs, or similar, do not count for grading of Top Batsman markets.</p>
CR.4.4	<p>Top Bowler:</p> <p>Grading is determined by the bowler with the highest number of wickets taken in the specified innings. Note, the number of runs conceded by each bowler is not considered for grading purposes.</p> <p>If two or more players tie as Top Bowler, Dead Heat rules apply.</p> <p>Wagers placed on any player who is not named in the starting eleven will be deemed no action and voided.</p> <p>Wagers placed on any player in the starting eleven stand, whether they bowl or not.</p> <p>A minimum of 90% of the entire overs allocated for the innings at the time that the wager was accepted must be played for wagers to be deemed to have action unless the innings reaches a natural conclusion in which case wagers will be deemed to have action.</p> <p>Wickets taken in Super Overs, or similar, do not count for grading of Top Bowler markets.</p>
Cycling	
Abandonment or postponement	
CY.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 24 hours of the original official start time.
CY.1.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
CY.2.1	Wagers will be graded based on official competition rules.
Futures	
CY.3.1	<p>If any competitor or team in a head-to-head wager do not start, then all wagers will be deemed no action and voided.</p> <p>If either competitor or team in a head-to-head wager withdraws after starting, then the competitor or team finishing will be deemed as the winner.</p> <p>If neither competitor or team in a head-to-head wager finishes the event, then all wagers will be deemed no action and voided.</p>
General market rules	
CY.4.1	Wagers will be deemed no action and voided if a cyclist does not start the competition, race or stage, as specified.
CY.4.2	Wagers will stand should a cyclist withdraw after starting the competition, race, or stage, as specified.
CY.4.3	If two riders finish with the same time, the official classifications from the governing body will be used for grading.
Specific market rules	
CY.5.1	<p>In a head-to-head wager, if the competitors or teams are eliminated at the same time/stage, the official governing body classifications will be used for grading.</p> <p>If both cyclists fail to finish the competition, race, or stage, as specified, wagers will be deemed no action and voided.</p>
Darts	
DA.1.1	If a player does not start the match, then wagers will be deemed as no action and voided.
DA.1.2	Wagers will be deemed as action when one dart is thrown.

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	Where the match starts, but does not finish, wagers will be deemed as no action and voided unless the result is already determined.
DA.1.3	For all Outright and Tournament Markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined. Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
DA.1.4	Highest checkout will have dead heat rules applied in the case of a tie.
DA.1.5	Bullseye is considered as a red checkout colour for grading.
Field Hockey	
FH.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
FH.1.2	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
FH.1.3	Wagers are graded by the result at the end of Regulation Time, plus any Stoppage Time that is played. Extra Time/Overtime (or equivalent) and/or Penalty Shootouts are not considered, unless otherwise stated.
Handball	
Overtime (or equivalent)	
HA.1.1	Wagers are graded by the result at the end of Regulation Time, plus any Stoppage Time that is played. Extra Time/Overtime (or equivalent) and/or Penalty Shootouts are not considered, unless otherwise stated.
Abandonment or postponement	
HA.2.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
HA.2.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
HA.3.1	Wagers on full game markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
HA.3.2	Wagers on period markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
HA.4.1	For all Outright and Tournament markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined. Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
General market rules	
HA.5.1	Where the mercy rule is applied, wagers will be graded based on the score at the time the rule is applied.
Jai-Alai	
JA.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
JA.1.2	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
JA.1.3	All wagers will be graded in accordance with official event rules and classifications.

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JA.1.4	In the case of a withdrawal before an event begins all wagers will be deemed no action and voided.
JA.1.5	In the event of any change in the format of an event, for example, the number of games required to win, all spread and totals markets will be deemed as no action and voided.
Lacrosse	
Overtime (or equivalent)	
LA.1.1	Wagers are graded by the result at the end of Regulation Time, plus any Overtime (or equivalent) that is played, unless otherwise stated.
Abandonment or postponement	
LA.2.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
LA.2.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
LA.3.1	Wagers on full game markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
LA.3.2	Wagers on period markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
LA.4.1	For all Outright and Tournament markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined. Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
General market rules	
LA.5.1	A two-point goal counts as two goals for grading purposes.
LA.5.2	All player markets will be graded as per statistics from the box scores on the official website of the competition.
Motorsports	
Abandonment or postponement	
MS.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 7 days of the official start.
MS.1.2	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Incomplete events	
MS.2.1	If a race is shortened due to weather conditions, or other circumstances, but the governing body deems an official result, wagers will be graded according to this result.
Futures	
MS.3.1	Futures wagers are considered as action where the named driver participates in any part of the race (qualification, main race).
General market rules	
MS.4.1	Unless otherwise specified, wagers are on drivers only.
MS.4.2	Grading will be based on official competition results as determined at the end of the race, with dead heat rules applying where necessary. Any post-race penalties or disqualifications will not be considered for grading purposes.
MS.4.3	If drivers retire in different laps, the number of finished laps is considered for grading.
MS.4.4	The start of the race is at the point the signal is given to begin the formation lap.

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MS.4.5	Wagers on stages will be declared no action and voided if the specified stage is not completed.
MS.4.6	If one or more drivers start from the pit-lane, these drivers will be ranked at the end of the starting grid for grading.
Specific market rules	
MS.5.1	Wagers on head-to-heads will be based on the order of finish at the completion of the specified stage.
MS.5.2	<p>Overtaking Markets:</p> <p>An overtaking must last until the end of a lap for grading.</p> <p>Overtakings during the first lap are not considered for grading.</p> <p>Overtakings of a driver in the same lap when they enter the pit-lane are not considered for grading.</p> <p>Overtakings of a driver during the lap of retirement are not considered for grading.</p> <p>Lapping and unlapping is not considered as overtaking for grading.</p>
MS.5.3	<p>Retirements Markets:</p> <p>A driver is considered as retired if they do not pass the finish line when the session is considered as completed, unless disqualified.</p> <p>If more than one driver retires in the same lap, dead heat rules apply.</p> <p>If a driver retires in the pit-lane, the last started lap is considered for grading.</p>
MS.5.4	<p>Pit-stops Markets:</p> <p>The driver who enters the pit-lane first is considered as the winner for grading.</p> <p>If a driver retires after entering the pit-lane they are still considered for grading.</p>
Netball	
NE.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 24 hours of the original official start time.
NE.1.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
NE.1.3	Wagers will be declared no action and voided if the full scheduled length of the event, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
NE.1.4	Overtime (or equivalent) is included for grading, unless otherwise stated.
NE.1.5	Player Markets will be deemed no action and voided if the specified player, or players, take no part in the event.
Olympics	
Abandonment or postponement	
OL.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 24 hours of the original official start time.
OL.1.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
OL.2.1	Wagers will be declared no action and voided if the full scheduled length of the event, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
Futures	
OL.3.1	<p>Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers.</p> <p>Any subsequent disqualifications or changes in placings, will not affect wagers.</p>

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OL.3.2	<p>While we endeavour to quote all participants, we may on occasion not list a participant, or to add a participant to markets after the markets are first published. Patrons may request players to be added to markets on request.</p> <p>If any participant or team is not offered for betting and wins the event, then all wagers on the event will be graded as losers.</p>
General market rules	
OL.4.1	Specific Sports Rules as listed in this document will govern grading of Olympic Sports, unless stated otherwise.
OL.4.2	If a participant or team does not start an event, then wagers placed on that competitor or team will be graded as losing.
OL.4.3	<p>Official results from the governing body, including podium placing, where applicable, will determine the grading of wagers.</p> <p>Protested or overturned results will not affect grading.</p>
OL.4.4	<p>If any competitor or team in a head-to-head wager do not start, then all wagers will be deemed no action and voided.</p> <p>If either competitor or team in a head-to-head wager withdraws after starting, then the competitor or team finishing will be deemed as the winner.</p> <p>If neither competitor or team in a head-to-head wager finishes the event, then all wagers will be deemed no action and voided.</p>
OL.4.5	Any medals won by a team per competition will count as one single medal regardless of the number of team members.
Specific market rules	
OL.5.1	<p>In a head-to-head wager, if the competitors or teams are eliminated at the same time/stage, the official governing body tie-breaker rules come into effect for grading.</p> <p>If there is no such tie-breaker rule, then all wagers are deemed no action and voided.</p>
Pesapallo	
PE.1.1	<p>Wagers are based on the result after the first two rounds (innings).</p> <p>Unless otherwise stated, any overtime (e.g., Supervuoropari) is not considered for grading.</p>
PE.1.2	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
PE.1.3	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Pickleball	
PI.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
PI.1.2	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
PI.1.3	All wagers will be graded in accordance with official event rules and classifications.
PI.1.4	In the case of a withdrawal before an event begins all wagers will be deemed no action and voided.
PI.1.5	In the event of any change in the format of an event, for example, the number of games required to win, all spread and totals markets will be deemed as no action and voided.
Pool	
PL.1.1	The participant progressing to the next round or lifting the trophy in the case of a final, will be graded as the winning selection.
PL.1.2	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
PL.1.3	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.

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PL.1.4	Dead heat rules apply for Top Points Scorer markets.
Rodeo	
RO.1.1	All wagers will be graded in accordance with official event rules and classifications regardless of subsequent disqualifications or changes.
RO.1.2	If a participant takes no part in an event, all wagers on that participant will be voided.
RO.1.3	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
RO.1.4	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Rowing	
RW.1.1	All markets graded on ceremony presentation.
RW.1.2	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
RW.1.3	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Rugby League and Rugby Union	
Overtime (or equivalent)	
RU.1.1	Wagers are graded by the result at the end of Regulation Time, plus any Stoppage Time that is played. Extra Time/Overtime (or equivalent) and/or Penalty Shootouts are not considered, unless otherwise stated.
Abandonment or postponement	
RU.2.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
RU.2.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
RU.3.1	Wagers on full game Markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
RU.3.2	Wagers on period Markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
RU.4.1	For all Outright and Tournament Markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined.
RU.4.2	Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
Specific market rules	
RU.5.1	Player wagers are deemed no action and voided if the selected player does not start the match, unless otherwise stated.
RU.5.2	Penalty tries count for total tries markets. Penalty tries do not count for first, next and anytime try scorer markets. Should a penalty try be awarded, wagers on first or next try scorer markets will be graded on the player that scores the following (non-penalty) try.
Sailing	
SA.1.1	All markets graded on ceremony presentation.

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SA.1.2	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
SA.1.3	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Snooker	
Abandonment or postponement	
SN.1.1	If a player does not start the match, then wagers will be deemed as no action and voided.
Incomplete events	
SN.2.1	If a match is completed before the scheduled number of frames required to win is reached, then all wagers on Correct Score and Total Frame markets will be deemed no action and voided.
SN.2.2	If the match is officially started and a player withdraws or is disqualified, wagers on the Money Line or Match Winner markets are graded based on the officially progressing player, and all other wagers will be declared no action and voided, unless they have already been resolved.
Futures	
SN.3.1	For all Outright and Tournament Markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined.
SN.3.2	Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
General market rules	
SN.4.1	In the event of a re-rack, wagers will be graded where a result has already been determined. Wagers placed before the start of the frame will stand on the re-racked frame. Any points scored prior to the re-rack do not count. Points scored after the re-rack of the frame is considered for grading.
Specific market rules	
SN.5.1	Fouls and free balls are not considered for grading in the "Potted Colour" Market.
Softball	
SF.1.1	Wagers are graded on the official result after 7 innings (6 ½ innings if the home team is leading), including extra innings.
SF.1.2	If the game ends by the relevant league's mercy rule, then all wagers will be graded according to the results at the time the mercy rule is applied.
SF.1.3	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
SF.1.4	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Swimming	
SW.1.1	All wagers on Swimming will be graded based upon the final standings published by the official governing body of the event. In the case of participants being tied, any tiebreak rules used by the official governing body will be used for grading. If no tiebreak rules are used, then dead heat rules will apply.
SW.1.2	A participant must pass the starting line for wagers to stand, otherwise wagers on that participant will be void.
SW.1.3	If the two participants in a head-to-head market take part in different heats, all wagers will be deemed no action and voided, unless there is a later stage of the event in which both participants do compete directly against one another.

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SW.1.4	A disqualification for infringement of starting will see the participant deemed as active and wagers on that participant will be graded as losers.
SW.1.5	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
SW.1.6	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Table Tennis	
Abandonment or postponement	
TT.2.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
TT.2.2	If the scheduled venue for an event is changed, then wagers will be deemed no action and voided.
Incomplete events	
TT.3.2	In the case of a player withdrawal or disqualification, all markets will be deemed no action and voided unless the outcome of the market is already determined.
Futures	
TT.4.1	Future player wagers will be deemed no action and voided if the player does not start the event, or if a player withdraws from the event without further action from the time at which the wager is struck.
TT.4.2	All Futures wagers are considered action if the player starts a match, whether they finish the match or not.
General market rules	
TT.5.1	If the length of an event is altered prior to starting, all wagers will be deemed no action and voided.
TT.5.2	If penalty points are awarded by the umpire, all wagers will stand.
TT.5.3	In a doubles match where a player is replaced by another player, all wagers will be deemed no action and voided.
TT.5.4	If a penalty game is awarded by the umpire, all wagers on that game will be deemed as void, unless the outcome of the market is already determined.
Volleyball	
Abandonment or postponement	
VO.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
VO.1.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
VO.2.1	Wagers on full game markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
VO.2.2	Wagers on period markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
VO.3.1	For all Outright and Tournament markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined.
VO.3.2	Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
General market rules	
VO.4.1	Golden set is not considered for grading.
VO.4.2	Official points deductions will be considered for wagers where the market has not been determined.

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	Markets which have been determined will not consider later points deductions.
Water Polo	
Abandonment or postponement	
WP.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 48 hours.
WP.1.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
WP.2.1	Wagers on full game markets, including money line, game spread and totals, will be declared no action and voided if the full scheduled length of play, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
WP.2.2	Wagers on period markets will be declared no action and voided if the specified period is not played to its conclusion, unless otherwise stated or the result has already been determined.
Futures	
WP.3.1	For all Outright and Tournament markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined.
WP.3.2	Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
General market rules	
WP.4.1	All match Markets will be graded based on regulation time, not including any extra time, unless otherwise stated.
Winter Sports	
Abandonment or postponement	
WS.1.1	If an event is abandoned, cancelled, or postponed then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete within 24 hours of the original official start time.
WS.1.2	If the scheduled venue for an event is changed, then wagers will still be valid and deemed action.
Incomplete events	
WS.2.1	Wagers will be declared no action and voided if the full scheduled length of the event, including overtime, if applicable, is not completed, unless otherwise stated or the result has already been determined.
Futures	
WS.3.1	For all Outright and Tournament markets, wagers will be deemed no action and voided if the officially scheduled number of events are not completed, unless the result has already been determined.
WS.3.2	Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Any subsequent disqualifications or changes in placings, will not affect wagers.
General market rules	
WS.4.1	If a competitor or team does not start an event, then wagers placed on that competitor or team will be graded as losing.
WS.4.2	Official results from the relevant governing body, including podium placing, where applicable, will determine the grading of wagers. Protested or overturned results will not affect grading.
Specific market rules	
WS.5.1	If any competitor or team in a head-to-head wager do not start, then all wagers will be deemed no action and voided. If either competitor or team in a head-to-head wager withdraws after starting, then the competitor or team finishing will be deemed as the winner.

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	If neither competitor or team in a head-to-head wager finishes the event, then all wagers will be deemed no action and voided.
Specials (e.g., Academy Awards, Oscars, Eating contests)	
SP.1.1	All wagers on awards ceremonies will be graded based on the official governing body of the specified awards. Unless otherwise stated all wagers on awards Markets and deemed as action regardless of the outcome. All wagers on award ceremonies Markets will be deemed as no action and voided if the ceremony is officially cancelled.
SP.1.2	All wagers on reality TV shows are graded based on the official results as announced by the broadcaster, or governing body. Unless otherwise stated, all wagers are deemed as action regardless of outcome. All wagers will be deemed no action and voided should the competition be cancelled by the applicable organising body.
SP.1.3	Dead heat rules apply where the winner is tied, and the governing body does not determine a single winner.



TO: Interim Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner

FROM: Crystal Beauchemin, Sports Wagering Business Manager
Carrie Torrisi, Deputy General Counsel
Katrina Jagroop-Gomes, Chief Information Officer

DATE: July 11, 2024

RE: 205 CMR 257.03(4) Waiver Extension

The Commission's sports wagering data privacy regulation, 205 CMR 257, went into effect on September 1, 2023. On August 24, 2023, the Commission issued a waiver to all operators from the requirements of 205 CMR 257.03(4) through November 17, 2023, to provide operators with an initial window of time to determine how much time they would need for full compliance with the regulation. On November 16, 2023, following receipt of additional information from the operators, the Commission issued a waiver until March 1, 2024.

Through the fall and winter, the Commission worked towards amending 205 CMR 257.03(4). On March 14, 2024, the Commission extended a uniform waiver to all operators from 205 CMR 257.03(4) through July 31, 2024, while in the process of reviewing amended language for promulgation.

The language initially promulgated read as follows:

Sports Wagering Operators encrypt or hash and protect, including through the use of multi-factor authentication, from incomplete transmission, misrouting, unauthorized message modification, disclosure, duplication or replay all Confidential Information and Personally Identifiable Information within their possession, custody, or control.

On April 11, 2024, the Commission voted to amend the regulation to add the following provision:

An Operator may request approval by the Commission to protect Confidential Information and Personally Identifiable Information in another manner that is equally protective of the information in question.

The amended language went into effect on June 21, 2024.

Both DraftKings and BetMGM have submitted their requests for Commission approval to protect confidential information and personally identifiable information in another manner than that prescribed by the first provision of 205 CMR 257.03(4), and Commission staff is working with its vendors to review these methods to ensure that they are equally protective of the information in question. Given the complex nature of these components, Commission staff estimates that it will need two-to-three months to complete this process. To ensure that there is adequate time to complete the review and bring a recommendation to the Commission, we recommend extending the waiver issued on March 28, 2024, until November 15, 2024.

Further, Commission staff has no concerns about the protection confidential information and personally identifiable information during the duration of the recommended extension given that both operators have identified that they are currently protecting such information via best practices and in accordance with other governing laws. They have each identified that significant security methods are in place and cybersecurity plans are established, and have confirmed that they are hashing or encrypting sensitive confidential information and personally identifiable information during transmission of data. In accordance with the Commission's regulations, each operator is in compliance with GLI-33 and has completed their technical security audits. In addition, they are each complying with ISO 27001 and PCI DSS, and DraftKings specified certifications via SOC2 Type 2 and SOX.



TO: Chair Maynard
Commissioner O'Brien
Commissioner Hill
Commissioner Skinner

FROM: Mark Vander Linden, Director of Research and Responsible Gaming

CC: Dean Serpa, Executive Director

DATE: July 11, 2024

RE: Debrief and discussion of the MGC Responsible Gaming Conference

On May 14, 2024, in Worcester the Massachusetts Gaming Commission hosted an inaugural conference focusing on research and responsible gaming. The theme was *“using research to rewrite the playbook: examining social impacts of sports betting and the changing landscape”* and featured sessions on the sports betting landscape, problem gambling resources, and responsible gaming tools. The goal of the event was to bring together gambling stakeholders in the Northeastern United States to consider how evidence can be mobilized to prevent and mitigate gambling harms.

Attendees represented a wide range of stakeholders including government, legislature, service providers, treatment professionals, industry, and academia. Given the tight New England gaming market and opportunities for collaboration, we were pleased to see representatives from all surrounding states. Capacity for the venue was 200 people and 207 registered. There were 185 in attendance.

Attached to this memo are the following documents:

- 1) Detailed agenda and session descriptions
- 2) Attendee evaluation completed by 78 attendees (42%)
- 3) Summary of interactive sessions



Massachusetts Gaming Commission

**Using Research to Rewrite the Playbook:
Examining the Social Impacts of Sports Betting and the Changing Gambling Landscape
May 14, 2024 AC Marriott 125 Front St, Worcester, MA 01680**

8:00 am to 8:45 am: Breakfast and Registration

8:00 am to 8:45 am: Open Recovery Meeting: Gamblers Anonymous/Gam Anon/All Pathways: A;; Welcome

8:45 am to 9:00 am: MGC VIPs/Welcome

9:00 am to 9:30 am: Setting the Stage for Sports Betting: What the World Indicated

Presenter: Dr. Sasha Stark, GREO

Sasha Stark, Ph.D., Director of Research and Evidence Services, Greo Evidence Insights

Session Description:

This session will discuss the health impact of sports betting on priority populations. Examples of evidence-based harm prevention and support will be addressed.

Learning Objectives: Through participation in this session, attendees will have a strengthened understanding of:

Population health impacts of sports betting being observed in jurisdictions internationally.

Priority populations for sports betting harm prevention and support.

Opportunities for evidence-based harm prevention/reduction action.

References:

Hing, N., Russell, A. M., Vitartas, P., & Lamont, M. (2016). Demographic, behavioural and normative risk factors for gambling problems amongst sports bettors [Article]. *J Gambler Stud*, 32(2), 625-641. <https://doi.org/10.1007/s10899-015-9571-9>

Killick, E. A., & Griffiths, M. D. (2020). A thematic analysis of sports bettors' perceptions of sports betting marketing strategies in the UK [Article]. *International Journal of Mental Health and Addiction*, 20(2), 800-818. <https://doi.org/10.1007/s11469-020-00405-x>

Deans, E. G., Thomas, S. L., Derevensky, J., & Daube, M. (2017). The influence of marketing on the sports betting attitudes and consumption behaviours of young men: Implications for harm reduction and prevention strategies [Article]. *Harm Reduction Journal*, 14(1), 5, Article 5. <https://doi.org/10.1186/s12954-017-0131-8>

Dr. Sasha Stark, GREO is Director of Research and Evidence Services at Greo Evidence Insights, an independent knowledge translation and exchange organization working across the health and wellbeing sectors. Sasha is an internationally known gambling researcher, having worked in the field for over 15 years. She has published numerous academic articles and reports, and has presented extensively internationally, including providing evidence to regulators and governments. In her current role, she oversees development of Greo's knowledge synthesis products, leads research activities, and works with stakeholders globally.

9:30 am to 10:30 am: How Prepared Are/Were We for Sports Betting? : Social Impacts of Gambling in the Northeast: SEIGMA

Presenter: Dr. Rachel Volberg

Rachel Volberg, Ph.D., President of Gemini Research, Professor University of Massachusetts, Amherst (MA)

Respondents:

Ellen Blake, Public Health Educator III (Prevention Specialist), Maine CDC and Prevention (ME)

Jeremy Wampler, LCSW, ICGC II, BACC, CGT, LADC, Behavioral Health Clinical Supervisor DMHAS, Problem Gambling Services (CT)

Session Description: This presentation focuses on social impacts associated with the introduction of casinos in Massachusetts followed by the introduction of legal sports betting. Based on surveys carried out before and after the construction and opening of three casinos in Massachusetts, social impacts include changes in attitudes toward gambling, gambling participation, problem gambling prevalence and awareness of problem gambling services. By highlighting both the positive and negative social impacts of the introduction of casinos and sports betting in the Commonwealth, the presentation

will underscore the importance of understanding the full range of impacts of gambling expansion and highlight the need to understand the balance of those impacts on individuals and communities.

Learning Objectives:

Attendees will be able to identify changes in the availability of gambling in Massachusetts.

Attendees will understand the social impacts of the expansion of legal gambling in Massachusetts.

Attendees will be able to identify specific measures that may be effective in minimizing gambling harm in Massachusetts.

References:

- Gemini Research. (2024). *Socioeconomic impacts of legalized gambling in Connecticut*. Hartford, CT: Department of Mental Health and Addiction Services.
- SEIGMA Research Team. (2018). *Social and economic impacts of expanded gambling in Massachusetts: 2018*. Amherst, MA: School of Public Health and Health Sciences. Available at <https://www.umass.edu/seigma/reports>.
- Williams, R. J., Rehm, J., & Stevens, R. M. G. (2011). *The social and economic impacts of gambling*. Final Report prepared for the Canadian Consortium for Gambling Research. Available at <http://hdl.handle.net/10133/1286>.

Dr. Rachel Volberg has been involved in research on gambling and problem gambling since 1985. She has directed or consulted on numerous gambling studies around the world, published extensively, and advised governments and private sector organizations on issues relating to gambling legalization, the epidemiology of problem gambling and public policy approaches to developing and refining services for problem gamblers and their families. Dr. Volberg is currently the Principal Investigator on two major studies funded by the Massachusetts Gaming Commission: the *Social and Economic Impacts of Gambling in Massachusetts* (SEIGMA) study and the *Massachusetts Gambling Impact Cohort* (MAGIC) study.

10:30 am to 10:45: Break

10:45 am to 11:45 am: Tools to Minimize Sports Betting Harm

Workshop 1: How does Positive Play and Online Support Tools Support Sports Bettors?

Presenters: Dr. Marc Potenza, Dr. Michael Wohl, Dr. Richard Wood

Michael Wohl, Ph.D., Professor, Dept. Psychology, Carleton University, Ottawa, ON (Canada)

Richard Wood, Ph.D., President GamRes (Canada)

Marc N. Potenza, MD, Ph.D., Director: Division on Addictions Research; Yale Center of Excellence in Gambling Research, Women and Addictions Core of Women's Health Research; Yale Impulsivity and Impulse Control Disorder Research Program; Professor of Psychiatry in the Child Study Center and of Neuroscience, Yale University School of Medicine (CT)

Session Description: This session will provide an overview of the positive play approach for promoting responsible gambling and give examples of this approach that might be utilized for online sports betting.

Learning Objectives:

Understand what the positive play approach is to responsible gambling.

Learn about the importance of player engagement with responsible gambling.

Be aware of how positive play might be encouraged amongst online sports bettors.

References:

- Wood, R. T., Wohl, M. J., Tabri, N., & Philander, K. (2023). Responsible Gambling as an Evolving Concept and the Benefits of a Positive Play Approach: A Reply to Shaffer et al. *Journal of Gambling Studies*, 1-8.
- Wood, R. T., Wohl, M. J., Tabri, N., & Philander, K. (2017). Measuring responsible gambling amongst players: Development of the Positive Play Scale. *Frontiers in psychology*, 8, 227.
- Wood, R.T.A., & Griffiths, M.D. (2015). Understanding positive play: An exploration of playing experiences and responsible gambling practices. *Journal of Gambling Studies*, 1-20.

Dr. Marc Potenza is a board-certified psychiatrist with sub-specialty training in addiction psychiatry. He has trained at Yale University receiving a combined BS/MS with Honors in Molecular Biochemistry and Biophysics and a PhD in Cell Biology, the latter concurrent with the MD through the Medical Scientist Training Program. He completed internship, psychiatric residency and addiction psychiatry fellowship training at Yale. Currently, he is a Professor of Psychiatry, Child Study and Neuroscience at the Yale University School of Medicine where he is the Director of the Division on Addictions

Research, the Problem Gambling Clinic, the Center of Excellence in Gambling Research, the Women and Addictive Disorders Core of Women's Health Research at Yale and the Yale Research Program on Impulsivity and Impulse Control Disorders.

Dr. Michael Wohl (Ph.D. Univ. of Alberta, 2003) is a Professor of Psychology at Carleton University. Work in his Carleton University Gambling Laboratory (CUGL) focuses on, among other things, factors that predict disordered gambling (e.g., erroneous beliefs, financial focus), facilitators of responsible gambling (e.g., monetary limit setting and adherence), and means to overcome barriers to behaviour change (e.g., nostalgia for life lived before the addiction behavior hold). Members of CUGL also examine the potential pitfalls and possible harm-minimization utility of rewards program membership. Dr. Wohl has published over 190 peer-reviewed papers.

Dr. Richard Wood is the president of www.gamres.org and for the last 25 years has been developing and evaluating responsible gambling initiatives, such as www.gamgard.com for considering responsible game design and www.gamtalk.org a free online support service for people with gambling related issues. More recently Dr Wood developed the concept of *Positive Play* and led the development of the Positive Play Scale (PPS) the first ever instrument to measure and optimize responsible gambling strategy. Dr Wood is based in Ontario Canada, but works with gaming companies, regulators and other gambling stakeholders world-wide.

Workshop 2: Taking a Break from Sports Wagering: Voluntary Self-Exclusion Programs and Related Data (A Panel):

How do we simplify these processes?

Presenters: Long Banh and Jeremy Wampler

Long Banh, MBA, LICSW, Program Manager, Massachusetts Gaming Commission (MA)

Andrew Collier, Deputy Commissioner, Vermont Department of Liquor and Lottery (VT)

Nancy A Murray, Former Program Manager, Consultant for Problem Gambling Services in RI (RI)

Milt Champion, Executive Director, Gambling Control Unit and Gambling Control Board of Maine (ME)

Jeremy Wampler, LCSW, ICGC II, BACC, CGT, LADC, Behavioral Health Clinical Supervisor

DMHAS, Problem Gambling Services (CT)

Jonathan Aiwazian, CEO IDPair (National VSE)

Session Description:

Self-exclusion from gambling is a powerful recovery tool for those looking to reduce problem gambling behaviors. This panel will explain the way voluntary self-exclusion has rolled out in different state and discuss the benefits and limitation of each approach. The participants will discuss the future of self-exclusion practices and the role of technology in making a nationwide self-exclusion program possible.

Learning Objectives:

Define self-exclusion and its effectiveness in reducing problem gambling behavior.

Identify three different state models for the harm reduction tool.

Describe the benefits of a nationwide self-exclusion program to reduce relapse/recurrence in those with gambling disorder.

References:

Matheson FI, Hamilton-Wright S, Kryszyjts DT, Wiese JL, Cadel L, Ziegler C, et al. The use of self-management strategies for problem gambling: a scoping review. *BMC Publ Health*. 2019;19:445.

Hayer T, Meyer G. Internet self-exclusion: characteristics of self-excluded gamblers and preliminary evidence for its effectiveness. *Int J Ment Health Addiction*. 2011;9:296–307.

Kraus L, Loy JK, Bickl AM, Schwarzkopf L, Volberg RA, Rolando S, et al. Self-exclusion from gambling: a toothless tiger? *Front Psychiatry*. 2022;13:992309.

Long Banh received his master's in social work from Simmons College and his master's in business administrations from Fitchburg State University and is a Licensed Independent Clinical Social Worker (LICSW) with clinical experience in community-based and acute settings with addiction, HIV/AIDS issues, and mental health. As a Program Manager with the Massachusetts Gaming Commission, he works collaboratively with casino operators and other stakeholders on a range of casino and community-based initiatives to build a sustainable and socially responsible industry in the state.

Jeremy Wampler is the Clinical Manager for the State of Connecticut, Department of Mental Health and Addiction Services, Problem Gambling Services. In this capacity he oversees problem gambling services for the state which include treatment, integration, prevention, and recovery. Jeremy is also a trainer, facilitating trainings for key stakeholders throughout the state, in order to build capacity and raise awareness. He currently serves as President of the International

Gambling Counselor Certification Board, and as Vice President on the Association of Problem Gambling Services Administrators board. Jeremy earned his MSW from Southern Connecticut State University, and he has been practicing in the field of problem gambling for over a decade.

11:45 am to 12:00 pm: Break

12:00 pm to 1:30 pm: Buffet Lunch

12:30 pm to 1:30 pm: Lived Experience Support during Sports Betting Mania

Presenters: Stephen Matos, Andrew Purslow, Billy R and Matt Smith

Matt Smith, Head of External Affairs, BetKnowMore (UK) /Gambling Treatment Consultant (UK)

Billy R., Recovery Advisory Board, MACGH (MA)

Stephen Matos, MCCA, Bettor Choice Program Peer Counselor and Recovery Support Specialist (CT)

Andrew Purslow, Senior Peer Aid Coordinator BetKnowMore (UK) /Gambling Treatment Consultant (UK)

Session Description: Peer support has been shown to be essential to those struggling with problematic gambling. With the increased presence of sports gambling, it is more important than ever to offer programs that support those in early recovery from Gambling Disorder. This panel of individuals with lived experience will discuss peer support programs available in MA, CT and the UK that have shown promising results, how the participants linked to peer support and their journey of both recovery and involvement in peer support services.

Learning Objectives:

To raise awareness about peer support programs.

To share lived experiences on finding and using these peer support programs

To discuss their roles in the Peer Support field and the Recovery Advisory Board .

References:

Alex Elswick, Amanda Fallin-Bennett, Voices of hope: A feasibility study of telephone recovery support, *Addictive Behaviors*, Volume 102, 2020,106182,ISSN 0306-4603, <https://doi.org/10.1016/j.addbeh.2019.106182>.

(<https://www.sciencedirect.com/science/article/pii/S0306460319300632>)

Ladouceur, R., Sylvain, C., & Gosselin, P. (2007). Self-exclusion program: a longitudinal evaluation study. *Journal of Gambling Studies*, 23(1), 85-94.

Napolitano, F. (2003). The self-exclusion program: legal and clinical considerations. *Journal of Gambling Studies*, 19(3), 303-315.

Chrysalis Research, Peer Aid Pilot: External Report for GamCare and BetNoMore UK, August 22, 2022

<https://www.chrysalisresearch.co.uk/>

Stephen Matos Stephen Matos is a person in long-term recovery of over 37 years from gambling, alcohol and as a person affected by problem gambling. After retiring from the State of CT DOT as an operations manager in 2012, Stephen began working for The Connection's Bettor Choice Gambling Treatment Program and is currently with MCCA's Bettor Choice Program as a Peer Counselor and Recovery Support Specialist for over 6 years. Stephen facilitates recovery groups, family support groups along with seeing clients individually focusing on supporting those with gambling disorders and their family members along the road of recovery. Stephen works closely with the DMHAS Problem Gambling Services, Connecticut Council on Problem Gambling and the RBAHO's in the facilitation of trainings, prevention, awareness activities and manages PGS gambling recovery support grant providing recovery opportunities for persons in recovery from problem and persons affected by it. He has presented on peer support related issues at the 2015 National Conference on Problem Gambling, CCAR's Pathways to Recovery Conference in 2016, honored with the CT Council on Problem Gambling's Recovery Award in 2015 and presented at their State Conference in 2017 and 2022. Stephen is a graduate of Advocacy Unlimited Recovery University, certified as a Recovery Support Specialist and has completed CCAR's Recovery Coach Academy and is an Internationally Certified Gambling Counselor (ICGC-II). Stephen has also worked the 24-hour problem helpline with CCPG.

Andrew Purslow - Senior Peer Aid Coordinator, Betknowmore (UK)has his own lived experience of gambling harm. He first joined Betknowmore as a service user in 2020, before becoming a volunteer for the organization and subsequently starting his current role in 2022. In addition to his work at Betknowmore he is also currently a member of the Recovery Advisory Board of the Massachusetts Council on Gaming and Health.

Matt Smith is Head of External Affairs for UK charity Betknowmore and has lived experience of gambling with over 9 years in continuous recovery. Matt is part of the senior management team at Betknowmore building relationships with stakeholders across the space and working on their communications and policy strategy. His working background was in the media industry where he spent over a decade working in management for UK radio station talkSPORT heading up major live sports events.

1:30 pm to 2:30 pm: Unintentional Impacts: Who Else Is Affected by Sports Wagering?

Workshop 1: Sports Betting Exposure for Youth and College Students

Presenters: Kaitlin Brown, Theresa Glenn and Dr. Zu Wei Zhai

Zu Wei Zhai, Ph.D., Assistant professor of Neuroscience at Middlebury College, (Middlebury, VT)

Kaitlin Brown, LPC, LADC, ICGC II, IGDC, BACC, Senior Director of Programs & Services, Connecticut Council on Problem Gambling (CT)

Theresa Glenn, MPH, Program Coordinator, Office of Problem Gambling Prevention, Springfield Department of Health, and Human Services (MA)

Session Description: This session will examine the relationships between weapons carrying, problem gambling severity, and gambling attitudes and behaviors among adolescents. Additionally, prevention efforts for college age individuals in CT and the work of the Young Adult Gambling Project (YAGP), a community based participatory research project which seeks to better understand the gambling behaviors of culturally and linguistically diverse Springfield young adults who are at risk for problem gambling will be discussed.

Learning Objectives:

Demonstrate the interactions of weapons-carrying and problem-gambling severity on adolescent gambling behaviors. Examine how participating colleges implemented strategies on campus through the CCPG's College Campus Gambling Prevention initiative.

To learn about the benefits of utilizing a community-engaged research approach to establish a unique partnership between young adults most at risk for problem gambling with researchers and public health professionals.

References

Zhai ZW, Hoff RA, Magruder CF, Steinberg MA, Wampler J, Krishnan-Sarin S, Potenza MN. Weapon-carrying is associated with more permissive gambling attitudes and perceptions and at-risk/problem gambling in adolescents. *J Behav Addict.* 2019 Sep 1;8(3):508-521. doi: 10.1556/2006.8.2019.42.

Zhai ZW, Hoff RA, Howell JC, Wampler J, Krishnan-Sarin S, Potenza MN. Differences in associations between problematic video-gaming, video-gaming duration, and weapon-related and physically violent behaviors in adolescents. *J Psychiatr Res.* 2020 Feb;121:47-55. doi: 10.1016/j.jpsychires.2019.11.005.

Responsible Play the Connecticut Way <https://www.drugfreect.org/responsible-play/>

Kaitlin Brown is a Licensed Professional Counselor (LPC), Licensed Drug and Alcohol Counselor (LADC), Internationally Certified Gambling Counselor (ICGC II), holds an International Gaming Disorder Certificate (IGDC) and is a Board Approved Clinical Consultant (BACC) with the International Gambling Counselor Certification Board providing supervision to those seeking certification for Gambling & Gaming Disorders. Kaitlin is currently the Senior Director of Programs & Services for the Connecticut Council on Problem Gambling. Kaitlin is currently a part of the Executive Team for the NCPG Prevention Committee and Co-Chair for both the Prevention and Helpline Committees. In 2021, Kaitlin was honored with the NCPG Jim Wuelfing Prevention Award for her work in helping advance the field of problem gambling prevention.

Theresa Turcotte Glenn, MPH studied psychology at Smith College as an Ada Comstock Scholar. She was introduced to the field of public health when looking for a graduate degree grounded in social justice. After receiving an MPH with a concentration in community health education at the University of Massachusetts School of Public Health and Health Sciences she worked as a Health Educator for the City of Springfield Department of Health and Human Services on a range of projects such as the award winning *Springfield Adolescent Health Project*. Later she worked closely with MassHealth, Massachusetts Medicaid program, on state-wide health improvement projects while employed at the University of Massachusetts Medical School, Office of Community Programs. In her current position as Problem Gambling Coordinator for the Springfield Department of Health and Human Services, she oversees several projects funded by the Massachusetts Gaming Commission, Community Mitigation Fund including the *Young Adult Gambling Project* and the *Springfield Safe Ride Home Project*. Both projects seek to address problem gambling in Springfield, MA where she is also a resident of nearly 30 years.

Dr. Zu Wei Zhai, PhD, is an assistant professor of Neuroscience at Middlebury College. He joined the Middlebury faculty in 2017 after completing his NIDA T32 post-doctoral training in the Department of Psychiatry at the Yale School of Medicine. At Middlebury, the Zhai lab focuses on the relationships between childhood adversity, neurocognitive development of self-regulation abilities, and the risk for substance and behavioral addictions.

Workshop 2: Navigating Sports Betting as a Concerned Significant Other

Presenters:

Enice Aviles, PsyD, LMHC, LPC, Private Practice Clinician (MA)

Marlene Warner, CEO The Massachusetts Council on Gaming and Health (MA)

Dawn Sauma, LICSW, Co-Executive Director Asian Task Force Against Domestic Violence (MA) **Dawn Sauma**, LICSW, Co-Executive Director Asian Task Force Against Domestic Violence (MA)

Session Description: Families and loved ones living with the issue of problem gambling experience a broad range painful harms including financial, emotional, social and spiritual and are often left feeling shame and isolation. They often do not know where to turn for help, support and understanding. This panel discussion will focus on the impact on family members as well as resources available to support affected others in crisis.

Learning Objectives:

Participants will hear from family members on the impacts of loved one's gambling.

Participants will learn of 3 resources to support loved ones impacted by problem gambling.

The panel will discuss the advent of sports betting expansion and how this has impacted the problem gambling field.

References:

Meyers, R., Miller, W. R., Hill, D. E., & Tonigan, J. S. (1998). Community reinforcement and family training (CRAFT): Engaging unmotivated drug users in treatment. *Journal of Substance Abuse, 10*(3), 291–308.

Nilsson, A., Magnusson, K., Carlbring, P., Andersson, G., & Hellner Gumpert, C. (2018). The development of an internet-based treatment for problem gamblers and concerned significant others: A pilot randomized controlled trial. *Journal of Gambling Studies, 34*, 539–559.

Svensson, J., Romild, U., & Shepherdson, E. (2013). The concerned significant others of people with gambling problems in a national representative sample in Sweden: A 1 year follow-up study. *BMC Public Health, 13*, 1087.

Dr. Enice Avilés has a doctorate in Clinical Psychology, is a Licensed Mental Health Counselor, a Licensed Professional Counselor, a Gender Specialist, a certified Sex Educator, and an AASECT Certified Sex Therapist. Dr. Avilés' general practice focuses on the treatment of depression, anxiety, trauma, problem gambling, and the emotional consequences of discrimination and bullying (for youths and adults). Her private practice with the transgender and gender non-binary community includes the evaluation and treatment of children, youth and adults presenting with gender dysphoria. She specializes in the diagnosis and treatment of sexual dysfunction as well as sexual orientation issues. She is innovative and her focus is on ensuring that clinical services, as well as professional training for her areas of expertise, are provided in-person and online.

Marlene Warner - As MACGH's Chief Executive Officer, Marlene D. Warner ensures MACGH is a thriving organization with global impact balancing public health priorities with a data-driven, people-first model, are growing our education, treatment, and advocacy strategies, and that diversity, equity, and inclusion centers in all we do. Marlene is recognized widely as a passionate, eminent expert in gambling and gaming. During her over two decades at MACGH, she has secured critical consumer protections, launched first-of-its-kind Voluntary Self-Exclusion programs, and spearheaded innovative programming amidst increasing digitalization. Her advocacy and leadership have garnered numerous awards, including the Monsignor Joseph Dunne Lifetime Achievement Award from the National Council on Problem Gambling (NCPG). She is also Principal with Spectrum Safer Gaming Advisors. Marlene holds a B.A. from Gettysburg College, an M.A. from The George Washington University, and a CSR certificate from Duke University. She is a former NCPG Board President and serves on NCPG's Advisory Board.

2:30 pm to 2:45 pm: Break

2:45 pm to 4:00 pm: Making Sense of GameSense: Awareness, Perceptions, and Engagement among Players and Casino Employee

Presenters: Mark Vander Linden and Dr. Michael Wohl

Michael Wohl, Ph.D., Professor, Dept. Psychology, Carleton University, Ottawa, ON (Canada)

Mark Vander Linden, Director of Research and Responsible Gaming, Massachusetts Gaming Commission (MA)

Session Description:

In the world of responsible gambling (RG), GameSense has emerged as a globally recognized program for RG awareness and advocacy, particularly within the casino landscape of Massachusetts. Despite its prominence, a notable gap exists in arms-length research evaluating whether GameSense effectively achieves its RG objectives. In this presentation, I will report the results of a comprehensive evaluation of GameSense, which was designed to provide deeper insights into how players and player-facing casino employees perceive and engage with the RG program. Specifically, the studies reported assessed awareness and perceptions of GameSense. A focal point will be GameSense engagement—a pivotal aspect in the trajectory towards responsible gambling in casinos that offer the program. Results provide insights into the motivations driving active involvement among engagers as well as barriers to engagement among non-engagers. Ultimately, the overarching aim of this presentation is to contribute to the cultivation of a safer and more sustainable gaming environment for all stakeholders. By shedding light on the dynamics of GameSense awareness, perceptions, and engagement, this presentation aspires to foster informed discussions and drive initiatives aimed at advancing responsible gambling advocacy within the casino industry.

Learning Objectives:

Gain insights into the awareness levels of Massachusetts casino patrons and employees regarding the GameSense program, including how effectively the program has disseminated information about responsible gambling practices within the casino environment.

Understand the varied perceptions of GameSense among players and casino employees, including insights into who perceives the program as relevant, its effectiveness, and the factors influencing engagement or lack thereof.

Identify key facilitators and barriers to engagement with the GameSense program among players and employees, enabling participants to understand the reasons behind engagement decisions and informing strategies for improving program uptake and effectiveness in promoting responsible gambling behaviors.

References:

Shaffer, H. J., Blaszczynski, A., & Ladouceur, R. (2020). Considering the public health and Reno models: Strategic and tactical approaches for dealing with gambling-related harms. *International Journal of Mental Health and Addiction*, 18, 806-818.

Tabri, N., Wohl, M. J. A., & Xuereb, S. (2021). Population-based safer gambling/responsible gambling efforts. In M. Hillbrecht (Ed.) *Prevention and Education Evidence Review: Gambling-Related Harm* (pp. 66-108). GREO. <https://doi.org/10.33684/2021.006>

Wohl, M. J. A., & Gaudett, G. (2023). Playing it safe: Understanding the importance of responsible gambling. *Psynopsis*, 3, 24-25

Mark Vander Linden, Director of Research and Responsible Gaming. Since 2013 Mark Vander Linden has served as Director of Research and Responsible Gaming for the Massachusetts Gaming Commission. In this role, he manages an extensive research agenda to advance an understanding of responsible gaming, gambling disorders, and the social, economic and public safety impacts of gambling in Massachusetts. Prior to joining the MGC, Mark was the Executive Officer of the Office of Problem Gambling Treatment and Prevention with the Iowa Department of Public Health where he oversaw problem gambling treatment prevention, treatment, recovery services, and workforce development. Mark serves on the Board of Directors of the International Center for Responsible Gaming. He received his Master's degree in Social Welfare from the University of California, Berkeley. Mark has clinical experience in community-based settings with addiction, HIV/AIDS issues, and children and family mental health.

Dr. Michael Wohl (Ph.D. Univ. of Alberta, 2003) is a Professor of Psychology at Carleton University. Work in his Carleton University Gambling Laboratory (CUGL) focuses on, among other things, factors that predict disordered gambling (e.g., erroneous beliefs, financial focus), facilitators of responsible gambling (e.g., monetary limit setting and adherence), and means to overcome barriers to behaviour change (e.g., nostalgia for life lived before the addiction behavior hold). Members of CUGL also examine the potential pitfalls and possible harm-minimization utility of rewards program membership. Dr. Wohl has published over 190 peer-reviewed papers.

4:00 pm to 4:45 pm: Where do we go from here? Future of Northeast Betting, Social Implications, and Shared Data/Resources:

Presenters: Dr. Sasha Stark and Mark Vander Linden

Mark Vander Linden, Director of Research and Responsible Gaming, Massachusetts Gaming Commission (MA)

Sasha Stark, Ph.D., Director of Research and Evidence Services, Greo Evidence Insights

Session Description:

This session will explore the emerging population impacts of sports betting, and actions stakeholders in New England could take.

Learning Objectives:

Reflect upon and discuss key issues they are observing in their roles within the gambling landscape.

Consider what issues could be prioritized by safer gambling stakeholders across New England.

Identify opportunities for action, based on their perspectives and examples presented from other jurisdictions

References:

A bad bet for sports fans: the case for ending the “gamblification” of sport Nerilee Hing, Matthew Rockloff and Matthew Browne

Journal: Sport Management Review, 2023, Volume 26, Number 5, Page 788 DOI: [10.1080/14413523.2023.2260079](https://doi.org/10.1080/14413523.2023.2260079)

Petrotta, B. A. (2023). From Prohibition to Promotion: Framing and Sourcing the Legalization of Sports Betting in the U.S.

Communication & Sport, 0(0). <https://doi.org/10.1177/21674795231193132>

Deans, E. G., Thomas, S. L., Daube, M., & Derevensky, J. (2016b). “I can sit on the beach and punt through my mobile phone”: The influence of physical and online environments on the gambling risk behaviours of young men. *Social Science and Medicine*, 166, 110–119.

Dr. Sasha Stark, GREO is Director of Research and Evidence Services at Greo Evidence Insights, an independent knowledge translation and exchange organization working across the health and wellbeing sectors. Sasha is an internationally known gambling researcher, having worked in the field for over 15 years. She has published numerous academic articles and reports, and has presented extensively internationally, including providing evidence to regulators and governments. In her current role, she oversees development of Greo’s knowledge synthesis products, leads research activities, and works with stakeholders globally.

4:45 pm to 5:00 pm: CEUs/Evaluation Survey and Closing



The Massachusetts Council
ON GAMING AND HEALTH

Massachusetts Gaming Commission’s Conference:

Using Research to Rewrite the Playbook: Examining the Social Impacts of
Sports Betting and the Changing Gambling Landscape

May 14, 2024 ~ Worcester, MA

EVALUATION

- There were 207 people who registered for the conference.
- There were 185 people who attended the conference. (89% of registrants attended)
- Overall, 78 attendees completed the evaluation. (42% of attendees completed the evaluation)

9:00 am to 9:30 am: **Setting the Stage for Sports Betting: What the World Indicated:**
Sasha Stark, Ph.D., Director of Research and Evidence Services, Greo Evidence Insights

The 74 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis % Respondents	Total					
		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	222	66%	30%	4%	0%	0%
A. The presentation was relevant to my needs and interests.	74	61%	32%	7%	0%	0%
B. The presenter covered the material in a way that was easy to understand.	74	66%	28%	4%	1%	0%
C. The presenter was knowledgeable about the subject presented.	74	70%	28%	1%	0%	0%

Overall, **96% agree (66% strongly agree and 30% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner, and the presenter was knowledgeable about the subject.

Was there one takeaway that you found most valuable?

Amount of money state of MA gets.

Different ways people can bet and engage in these types of behaviors.

Gambling disorder is everywhere.

GameSense

Generally informative, helpful to apply to my own client i.e., young males between the ages of 19-32.

Greater awareness

History

How widespread it is

Impact of sports betting on our states.

information

It gave me hope and fuel to advocate for better data in my state!

It was a great setup for the rest of the day as we talked about the basics of gambling.

Lower risk gambling guidelines

Monthly email to gamblers on wins/losses

More knowledge of GReo

Profile of sports gambler

Regulatory approaches from other countries

Sasha Stark was excellent!

Sports gambling is ever present.

Statistics

Surprised numbers didn't change that much even with online gaming

the importance of educating people about pros and cons of gaming

The percentage of people that sport bet.

The research was powerful

The targeting group and the individual reflection

Understanding how different countries use policy to help the problem gambler population

We can learn from difference practices in other countries or regions.

Websites available

9:30 am to 10:30 am: How Prepared Are/Were We for Sports Betting? Social Impacts of Gaming in the Northeast:

Follow Up General Population (full findings) and Highlights from the CT Impact Study:

Rachel Volberg, Ph.D., President of Gemini Research, Professor University of Massachusetts, Amherst (MA)

Respondents:

Ellen Blake, Public Health Educator III (Prevention Specialist), Maine CDC and Prevention (ME)

Jeremy Wampler, LCSW, ICGC II, BACC, CGT, LADC, Behavioral Health Clinical Supervisor DMHAS, Problem Gambling Services (CT)

The 77 attendees who completed the evaluation, were asked their level of agreement with the following statements:

Analysis % Respondents	Total					
		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	231	69%	25%	5%	0%	0%
A. The presentation was relevant to my needs and interests.	77	69%	25%	6%	0%	0%
B. The presenters were knowledgeable about the subject presented.	77	74%	22%	3%	1%	0%
C. The presenters covered the material in a way that was easy to understand.	77	65%	29%	6%	0%	0%

Overall, **94% agree (69% strongly agree and 25% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner and the presenter was knowledgeable about the subject.

Was there one takeaway that you found most valuable?

- % of people harmed*
- All the gambling revenue coming from people experiencing harm*
- citizens of MA don't seem to want increased gambling opportunities*
- CT Needs more funding for treatment, it's too low*
- CT overall is doing a great job with providing support and resources to people with gambling challenges*
- Great to see the comparisons between MA and CT studies*
- Greater awareness's*
- I forgot*
- I learned a great deal in terms of the escalating trend of sports betting - especially as I live and work in CT.*
- information*
- Lottery sales are down*
- Ma and CT info*
- Prev in mass*
- Research done during Covid was simply wasted money because it corrupted results*
- Rigorous research !*
- SEIGMA study data*
- similar issues to mass*
- Specific recommendations to inform efforts in CT*

Sports betting is on the rise and is not going away.
The amount of gambling funding from individuals most impacted is concerning.
The human reflections
The information given on stats was so valuable but I thought it could have been more concise.
The knowledge of the speakers
The outcome of the surveys
The social impact that were described are consistent with what I’m seeing in my clinical practice
The social impact was very interesting
The work is being done in different places to acknowledge potential risks
They needed more time to speak!
Use of airspace research of cell phone to build casino traffic demographic models
Variances in each State
We are not prepared

10:45 am to 11:45 am: Tools to Minimize Sports Betting Harm: Workshops

Workshop Session 1: How does Positive Play and Online Support Tools Support Sports Bettors?

Michael Wohl, Ph.D., Professor, Dept. Psychology, Carleton University, Ottawa, ON (Canada)

Richard Wood, Ph.D., President GamRes (Canada)

Marc N. Potenza, MD, Ph.D., Director: Division on Addictions Research; Yale Center of Excellence in Gambling Research, Women and Addictions Core of Women’s Health Research; Yale Impulsivity and Impulse Control Disorder Research Program; Professor of Psychiatry in the Child Study Center and of Neuroscience, Yale University School of Medicine (CT)

The 41 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis % Respondents	Total					
		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	123	72%	21%	5%	0%	2%
A. The presentation was relevant to my needs and interests.	41	66%	24%	7%	0%	2%
B. The presenters covered the material in a way that was easy to understand.	41	71%	24%	5%	0%	0%
C. The presenters were knowledgeable about the subject presented.	41	80%	15%	2%	0%	2%

Overall, **93% agree (72% strongly agree and 21% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner, and the presenters were knowledgeable about the subject.

Was there one takeaway that you found most valuable?

Canada has great research on gambling
Definition of positive play
Gambling as a regulator of emotions
How the language matter and different strategies to approach it

I loved hearing from 3 different presenters. It was a great use of time and gave use so many examples.

Positive play was the biggest thing for me to take away from this presentation.

In play vs. cash out betting knowledge

New online platform? Exciting!!!

Online support tools may make a big difference in the treatment of gambling disorder.

Positive play can be used to promote responsible gambling

positive play and online support were unknown to me

presenters

Really enjoyed learning more about the CBT4CBT app and wish this session was longer

The positive approach to encouraging responsible gambling made sense

The presentation on how state of mind, like hunger could impact risk-taking behavior.

The.app.they are working on

Understand the concept of positive play and the importance of prevention

Using positive play language

Workshop Session 2: Taking a Break from Sports Wagering: Voluntary Self-Exclusion Programs and Related Data (A Panel):

How do we simplify these processes?

Long Banh, MBA, LICSW, Program Manager, Massachusetts Gaming Commission (MA)

Andrew Collier, Deputy Commissioner, Vermont Department of Liquor and Lottery (VT)

Nancy A Murray, Former Program Manager, Consultant for Problem Gambling Services in RI (RI)

Milt Champion, Executive Director, Gambling Control Unit and Gambling Control Board of Maine (ME)

Jeremy Wampler, LCSW, ICGC II, BACC, CGT, LADC, Behavioral Health Clinical Supervisor DMHAS, Problem Gambling Services (CT)

Jonathan Aiwazian, CEO IDPair (National VSE)

The 36 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis %	Total					
Respondents		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	108	71%	23%	6%	0	0
A. The presentation was relevant to my needs and interests.	36	69%	25%	6%	0	0
B. The presenters covered the material in a way that was easy to understand.	36	72%	22%	6%	0	0
C. The presenters were knowledgeable about the subject presented.	36	72%	22%	6%	0	0

Overall, **94% agree (71% strongly agree and 23% agree)** that the presentation met their needs and interests, the material was presented in an easy to understand manner and the presenters were knowledgeable about the subject.

Was there one takeaway that you found most valuable?

Beneficial info and data. Self-exclusion is such an important tool.

Different ways these can occur

Good to know what VSE looks like in each state.

Great see the demo of apps to offer self-exclusion.

How the different states deal with self-exclusion

It was good to hear where other states in New England are at vis a vis VSE and the possibility of a universal VSE some day in the future.

Learning that self-exclusion can now be applied to online and sports betting

Need for vse nationally

That each jurisdiction has different rules and regulations, and it would be helpful if everyone collaborated and used similar rules. And universal list would also be helpful.

The comforting news that so many places use SE.

The efficacy of voluntary self-exclusion programs

The process for self-exclusion is becoming easier for those that want to self-exclude. Especially being able to do it online.

There is no uniformity on VSE and none of it truly relates to the gamblers mindset

Too much info in too short a time to comment.

Useful information for our patients.

We need to figure out how to make this easier for the user and ID s need to be mandatory at casinos

12:30 pm to 1:30 pm: Lived Experience Support during Sports Betting Mania

Matt Smith, Head of External Affairs, BetKnowMore (UK) /Gambling Treatment Consultant (UK)RAB, MACGH (MA)

Stephen Matos, MCCA, Bettor Choice Program Peer Counselor and Recovery Support Specialist (CT)

The 71 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis %							
Respondents	Total	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	
Base	213	75%	20%	4%	0%	0	0
A. The presentation was relevant to my needs and interests.	71	70%	24%	6%	0	0	0
B. The presenters covered the material in a way that was easy to understand.	71	76%	18%	4%	1%	0	0
C. The presenters were knowledgeable about the subject presented.	71	79%	18%	3%	0	0	0

Overall, **95% agree (75% strongly agree and 20% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner, and the presenters were knowledgeable about the subject.

Was there one takeaway that you found most valuable?

- Always appreciate people with lived experience's willingness to share their stories*
- Always benefit to meet those who experience*
- Always great to hear lived experience*
- Always valuable to add a human element.*
- Different pathways to recovery, the importance of loved experience*
- great presenter*
- Hearing people's personal experience was so helpful in understanding the supports people need.*
- This session was one of the best*
- How powerful GA is for those quitting*
- How valuable lived experience is*
- Interesting UK guys*
- It would have been great to hear from some young people, people of color and women.*
- It's overwhelming everywhere*
- Lived experience is most persuasive!*
- Lived experience stories and finding the right fit of support*
- Loved Robs story brought me back to my early days of recovery*
- Loved to hear from loved experience*
- No one thing in particular but it was all very useful*
- Only white men have a gambling problem*
- Podcasts are useful tools for those in recovery*
- Power of peers*
- Powerful stories of recovery.*

Recovery is possible.

remembering why we do this work

Sincere and important sharing. I was moved and impressed.

Success diaries can be very reinforcing to me

That support from 12 step programs appeared to be an integral part of their recovery , as well as helping others.

The honesty of the speakers

The impact of gambling and those close to them

The lived experience conversation helped with understanding of how problem gamblers can effect a family

The power of lived experience

The presenter who spoke about almost leaving a GA meeting. So powerful and moving. Thank you for making the time for folks with lived experiences to speak to us.

the role of family life

Those in the recovery community are interested in providing feedback on RG tools/regs

very much enjoyed hearing both the stories of recovery but also approaches taken in UK/other areas to integrate peer support into existing delivery systems.

voices of those with lived experience are critical in how we make decisions and evaluate ongoing success

1:30 pm to 2:30 pm: Unintentional Impacts: Who Else Is Affected by Sports Wagering? Workshops

Workshop Session 1: Sports Betting Exposure for Youth and College Students: Expert Panel:

Zu Wei Zhai, Ph.D., Assistant professor of Neuroscience at Middlebury College, (Middlebury, VT)

Kaitlin Brown, LPC, LADC, ICGC II, IGDC, BACC, Senior Director of Programs & Services, Connecticut Council on Problem Gambling (CT)

Theresa Glenn, MPH, Program

The 45 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis %						
Respondents	Total	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	135	68%	24%	7%	0	0
A. The presentation was relevant to my needs and interests.	45	69%	22%	9%	0	0
B. The presenters covered the material in a way that was easy to understand.	45	67%	24%	9%	0	0
C. The presenters were knowledgeable about the subject presented.	45	69%	27%	4%	0	0

Overall, **92% agree (68% strongly agree and 24% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner, and the presenters were knowledgeable about the subject.

Was there one takeaway that you found most valuable?

- All three presentations were excellent.*
- CCPG is doing a great job at reaching the college demographic*
- College kids can be creative.*
- Gaming information*
- good information and presenters*
- Good stuff happening at CT colleges*
- Great mix of presenters*
- Great research in Springfield going on*
- I gained insight to how young people are influenced by gaming at an early age*
- I like their creative programs!*
- I liked how there was youth present for that lecture. They were so alive.*
- I loved the students and thought they were amazing. I think if we got more young people like them on board, they could make a difference!*
- impact on youth*
- It was all helpful*
- It was good but you say youth but it didn't go under the age of 18 really which I was hoping for. So much great information about programming we can do.*
- Loved learning about what the young adults are doing in the realm of gambling awareness*
- Some awesome ideas for how to start serving youth better in my state.*
- the examples of different initiatives,*

The other effects of gambling

The youth group from Springfield was the best presentation of the conference.

Very surprise about de correlation regarding gambling and weapon carrying in young adults

We work primarily with adults so not so impactful to our clinical work but the information on weapons carrying and gambling was interesting

Youth as a vulnerable group to problem gambling.

youth especially male r one of most vulnerable group-very compulsive

Workshop Session 2: Navigating Sports Betting as a Concerned Significant Other (CSO):

Eunice Aviles, PsyD, LMHC, LPC, Private Practice Clinician (MA)

Marlene Warner, CEO The Massachusetts Council on Gaming and Health (MA)

Dawn Sauma, LICSW, Co-Executive Director Asian Task Force Against Domestic Violence (MA)

The 23 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis %	Total					
Respondents		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	69	78%	17%	4%	0	0
A. The presentation was relevant to my needs and interests.	23	74%	22%	4%	0	0
B. The presenters covered the material in a way that was easy to understand.	23	74%	22%	4%	0	0
C. The presenters were knowledgeable about the subject presented.	23	87%	9%	4%	0	0

Overall, **95% agree (78% strongly agree and 17% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner, and the presenters were knowledgeable about the subject.

Was there one takeaway that you found most valuable?

Asking the questions to see if someone is suicidal

BECK Risk Assessment never used it before will implement it in my practice

Different race focused

Dr Aviles story was really powerful

Family impact.

Family members of gamblers are under-served.

Importance of evaluating suicidal ideation. Need to provide treatment for the person struggling with gambling addiction and their CSO.

Several AAPI audiences and family and suicide and dv potential issues.

Sincere and passionate professional presentations.

Suicidality impact on families

suicide risk is significant and clarity on assessment was very valuable

That we need more linguistically and culturally attuned resources for gamblers and their families. The Mass Gaming council person seems to be disconnected to this theme.

That we need to reach this group of people, and we aren't.

The representative from the Asian Domestic Violence Task force and the findings of the CARES study showing a large overlap between gaming and spousal violence.

Unpacking impact on CSOs

2:45 pm to 4:00 pm: GameSense Third-Party Evaluation and Report:

Michael Wohl, Ph.D., Professor, Dept. Psychology, Carleton University, Ottawa, ON (Canada)

Mark Vander Linden, Director of Research and Responsible Gaming, Massachusetts Gaming Commission (MA)

The 65 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis %	Total					
Respondents		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	195	65%	30%	4%	1%	1%
A. The presentation was relevant to my needs and interests.	65	62%	28%	8%	2%	2%
B. The presenters covered the material in a way that was easy to understand.	65	65%	32%	2%	0	2%
C. The presenters were knowledgeable about the subject presented.	65	68%	31%	2%	0	0

Overall, **95% agree (65% strongly agree and 30% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner and the presenters were knowledgeable about the subject.

Was there one takeaway that you found most valuable?

1.25 hours is way too long for an afternoon session.

A tool of prevention and education

Dr Wolh

Game sense is best viewed as a primary prevention program and a responsible gaming strategy

Game sense is good for everyone.

Game Sense is making a difference.

GameSense lounge to get away! Love it!!!

GameSense needs to be tweaked to allow advisors to really use their talents.

GameSense should be adopted into CT as their support is working to protect others

Good job on the study

Helpful info about the effectiveness of game sense and why.

How it is educational

I learned a lot about GameSense’s presence in the various gambling venues

I like the potential policy recommendations from this study.

I wish they had better stats to show what really works

I'm very fascinated about GameSense. I wish we had it in Maine. However, I think GameSense should keep in mind that although the idea is to reach all players, a lot of players are very private and may not want to be seen in the GameSense area, due to the stigma. I wonder if GameSense could be visible, yet offer privacy at the same time.

Importance of game sense

Interesting

it works but need more advertising/education about it

Loved the recommendations and how GameSense can be improved
Overcoming illusion of control erroneous beliefs and persistence to educate RG
Positive resource. I have questions.
Prevention strategies are really working.
The importance of GameSense
the information
The program and it's presence at the casinos
Usefulness of program
Very engaging discussion, information, and relevance to other areas in NE was valuable.
When utilized, data demonstrates the value of Game Sense for all levels of gambling.

4:00 pm to 4:45 pm: Where do we go from here? Future of Northeast Betting, Social Implications, and Shared Data/Resources:

Mark Vander Linden, Director of Research and Responsible Gaming, Massachusetts Gaming Commission (MA)
Sasha Stark, Ph.D., Director of Research and Evidence Services, Greo Evidence Insights

The 56 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis %	Total					
Respondents		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Base	168	58%	33%	8%	1%	0
A. The presentation was relevant to my needs and interests.	56	57%	34%	7%	2%	0
B. The presenters covered the material in a way that was easy to understand.	56	57%	32%	11%	0	0
C. The presenters were knowledgeable about the subject presented.	56	61%	32%	7%	0	0

Overall, **91% agree (58% strongly agree and 33% agree)** that the presentation met their needs and interests, the material was presented in an easy-to-understand manner, and the presenters were knowledgeable about the subject.

Q25 Was there one takeaway that you found most valuable?

De-normalize gambling, severe neg impact on families and need for funding to help them
Discussions
Different people can come together to solve an issue for the betterment of all.
Family members impacted
group discussion
I didn't think I would like the interaction but I really did!
I left feeling positive and hopeful and that such good work is being done with so much more to do
I was hopeful
Importance of collaboration.
Loved the individual reflection and group
Provide counter education to allure of gambling. Provide finance education. Provide alternatives to well being sold by gambling industry
Reviewing all presentations and topics was very useful and helped us offer feedback

Social Implications

That there is need to provide much more awareness around gambling responsibility.

the information and network

The northeast region needs to work together to help promote best practices

Very interesting research agenda for the future. I suggest having more product demos and networking time at the event.

We have a lot to do













We need more feedback from active gamblers

We need to stay ahead of the curve

4:45 pm to 5:00 pm: CEUs/Evaluation Survey and MGC Closing

Please rate your knowledge of this conference subject.

The 79 attendees, who completed the evaluation, were asked their level of agreement with the following statements:

Analysis %	Total								
Respondents		Very High Level	Somewhat High	Somewhat Low	Very Low Level				
Base	158		36%		51%		13%		1%
A. Before the conference	79		24%		52%		23%		1%
B. After the conference	79		48%		49%		3%		0

Before the conference, 76% considered their knowledge of the subject matter at a high level (24% very high level and 52% somewhat high level). As many as 24% considered their knowledge of the subject matter low level.

After the conference, 97% considered their knowledge of the subject matter at a high level (48% very high level and 49% somewhat high level). Only 3% still considered their knowledge of the subject matter low level.

Please share one highlight of this conference:

Afternoon presentation on college and Springfield Youth. Left with ideas. Also learned about paper on gaming and gambling connection. was able to access it.

connecting with others, comparing trends across the region

Contacts , game scenes

Cool presentation

Dr Aviles presentation.

Dr. Provenza shared about amazing new treatment approaches

Everything was excellent, thank you!

Getting to meet the GameSense team

Great group & content.

Great inclusion of multiple stakeholders

Great info on gambling reduction ideas

Great location and so good to connect with so many people

Great presentations.

Great presenters focusing on one area
I enjoyed the panel discussions with the people with lived experience speaking
I learned a lot about the self-exclusion program today. Good work!
I love GameSense, -great for prevention
I love the breakout session involving the college students. We need more of this!!
I think it was when the youth did their presentation. They were so alive.
I think the Rachel's discussion on MA and CT studies was best
I was somewhat disappointed in the focus being more on "problem gambler" instead of the illness of compulsive gambling. In some ways that minimizes the problem out there.
Increased understanding of the impact of prevention strategies.
Influence of involvement of college student. For. Prevention approach. Correlation of gun ownership with gambling behavior
Info on sports betting in particular.
Information provided at the end was useful
It was a great idea to bring the region together - great knowledge share
It was nice to see that there are so many people working on the efforts to help those struggling with gambling addiction.
Learning from other states and countries.
Learning the impacts on youth & cash out options in SW
Lived experience
Lived experiences
Loved hearing all the research and lived experience folks.
Loved the involvement from youth! AND the food!
Meeting many great passionate people.
Meeting people in the field.
networking
Networking and having the opportunity to speak with researchers in the field
Networking and the overall quality of presentations
New England State initiatives
panel of voices with lived experience
Positive Play
Seeing many peers from CT and networking throughout the day
Sharing of data and networking with others
Sports betting and effected other info
The afternoon session on young people.
The CBT4CBT app was interesting.
The conference was well run and included a wide range of industry stakeholders.
The guest speakers understood the material they presented. I was highly interested in the topics they were discussing.
The highlight was speaking with so many different stakeholders who were committed to learning and engaging with others for the importance of the safeguarding vulnerable populations.
the presenters and the venue
The research on youth population and new program developing was very great, the recommendation from studies were also great tool
The speakers

The speakers!
The willingness to collaborate and work together
The youth group was excellent
Variety of speakers - I especially appreciated our visitors from the UK
Youth panel

Please share how this conference could be improved?

2 days would be great!
A location a bit more easy to travel in/out of.
At this time, I have no comments except to applaud the leadership of this Conference and the great turnout.
better location
bigger room
Could be more product demo at the event. More networking time, such as speed dating round table activity.
duration 8:30 sign in. 9 am - 3 pm
Fewer presenters with industry-based COIs
Fewer speakers with longer allotted time to speak.
Fewer topics and longer sessions
Having a larger breakfast (e.g., eggs).
I think considering spreading modules out over two days or having less content. It felt like we were constantly running out of time and then over into breaks and then into the next section.
I thought the focus on data was important and set this conference apart from many others in the region.
I will send you my thoughts
I would have liked it to be more than just the sports gambling topic but I understand that is the current issue needing to be addressed.
Identify prevention measures for risk and impulsive poor self-control behaviors
In the future I think it would be beneficial to hold the conference in a larger space and hold all workshops and presentations in one room.
Include more variety of topics aside from data from research. Group participation was useful at the end.
It did not have enough content relating to the main topic.
It would be great to have the research be balanced with more treatment presentations too.
Keep up the work. As you've been doing with top drawer researchers
Larger area, felt cramped.
Location
Love to get more in the weeds and get into details. Some presenters just need more time to talk
Make it 2 days with more opportunities for networking
Make it closer to CT is was over a 2 hour drive
Make it more youthful. Get fun with the research
Maybe not doing group discussions and worksheets at the very end.
more breakouts, cultural implications, treatment integration

More diversity, more information about vulnerable populations, more personal accounts. Maybe have a two day option. The first day could be in depth workshops that help attendees better understand the constantly changing gambling world such as the basics of sports betting and how it works.

More information. Parking was hard to find and I didn't know we had to pay (I didn't even have anything to pay with because I couldn't use apple pay so I had to have a coworker pay for me) for the garage. It was also not in the best location. It was hard driving through Worcester so maybe something not really in down town. Also, you needed a larger venue. It was crowded in that main room.

More literature about interventions and support services

More networking time

More on self help

More state inclusive

More time for break out sessions

More treatment related info and resources included in sessions.

Give more time for presenters give information

Parking! My car would not fit in the hotel garage (over 8 feet) but luckily I found a close-by on street spot, good for 2 hours. Went out to feed the meter and my license plate had reached the max per day! I moved it to another spot around the corner but still I couldn't feed the meter. I had to leave and head home hours earlier than I wanted to! I was so disappointed.

Perhaps hearing more success stories

Please have one that focuses only on MA and have more up to date data.

Presenters sometimes were reading off slides, a little bit like a lecture.

Provide workshops on treatment, not only research and prevention.

Rather than 3, 15 minute presentations on research, it would be nice to have one 15-20 minute presentation on research followed by a panel discussion/questions.

Split it up into two days

The 1:30 session had a family breakout and a youth one. I would have liked to see both of those.

The conference itself was great. The venue was very nice, but it was way too hot. The food was very good.

The conference was very heavy on research. It would be beneficial to mix some treatment recommendations, etc., in with the research piece.

To advertised it more to be able to have more people knowing about this type of conference

Too much and too long

will process

Comments /Suggestions for next year’s conference?

1 day sports 1day online

Bring in active gamblers to present their experiences

Can we do two 10-2 days, with virtual options? Change location to Tower Hill Botanical Gardens.

Consider doing a session in Spanish or another language other than English.

Day trading and stock market

Education on topics related to individual therapy and treatment

Excellent overall

Excellent presentations and discussions amongst the participants. Excellent job.

I like the focus on sports betting, I would like to see and hear more about how different types of addiction and mental health issues correlate. Also, would like to hear more about intersectionality and inclusion frameworks of programs and research conducted.

I loved having multiple perspectives and presentations in the workshops. I think that is something that should definitely carry over into next year. It made me feel like I got the most out of the hour and I learned so much. The day was too long though and the drive back for me was going to be 2 hours if I stayed till 5 so I missed the end to try and avoid some of that traffic. Maybe do either 2 days in person or have a day that is 9-3 and have a virtual training that follows up.

I think this conference should absolutely be held again, whether annually or bi-annually, with additional workshops on Court appointed exclusion, and other services and impacts on populations.

I was at a conference recently and there was a research group talking about data storytelling and how to develop talking points and conversations for advocacy based on research. It would be helpful to have something like that for the providers and advocates who attend.

I would like to see a subject that addresses more broadly the gambling problem

Migration of gaming to gambling.

More bout treatment modalities not so much research

More data on online gambling

More details on measurement items for relate concepts, community related research methods.

More information on the types of sports betting

More research

More workshops.

None

Non treatment options in breakouts

Not having to pay for parking. We are already paying for the conference.

Perhaps hearing from treatment providers and best practices

Same as above

See last response. It was a little long. By the end I was tired and it was hard to participate fully.

The space was too small, felt claustrophobic (middle room).

Understanding micro transactions

updates on programs that exist and on new ones

Where sports betting has taken us from 2024 to2025

Workshops were great!

What category best describes your area of work?

Break % Respondents	
Base	79
What category best describes your area of work?	
Treatment	42%
Prevention	23%
Recovery	15%
Responsible Gambling	10%
Industry/Operator	8%
Student	3%

Q31 How would you rate:

Analysis % Respondents	Total										
		Excellent	Very Good	Good	Fair	Poor					
Base	158		39%		37%		17%		7%		1%
The promotion of the conference	79		29%		34%		25%		11%		-
The conference overall	79		48%		39%		9%		3%		1%

- The promotion of the conference was considered excellent (29%) or very good (34%) by a sum of 63% of the attendees evaluating the conference.
- However, the conference overall, was rated excellent (48%) or very good (39%) by a sum of 88% of the attendees evaluating the conference.



NEW ENGLAND CONFERENCE

Using Research to Rewrite the Playbook: Examining the Social Impacts of Sports Betting and the Changing Gambling Landscape

Summary of the interactive sessions

Event background

On May 14, 2024, the Massachusetts Gaming Commission and Massachusetts Council on Gaming and Health held their conference '*Using Research to Rewrite the Playbook: Examining the Social Impacts of Sports Betting and the Changing Gambling Landscape*' to bring together gambling stakeholders in the Northeastern United States to consider how evidence can be mobilized in the region for prevention and mitigation of harms from the expansion of sports betting.

Overview of the interactive sessions

During the morning context-setting presentation, "*Setting the Stage for Sports Betting: What the World Indicated*", Dr. Sasha Stark from Greo Evidence Insights (Greo) shared evidence about the:

- Population health impacts of sports betting being observed in jurisdictions internationally.
- Priority populations for sports betting harm prevention and support.
- Opportunities for evidence-based harm prevention and reduction action.

At the session close, participants were asked to complete a worksheet asking what they saw as the future of sports betting in New England.

Following the day's conference sessions, the participants reconvened in the afternoon to discuss "*Where do we go from here? Future of Northeast Betting, Social Implications, and Shared Data/Resources*" in a workshop-style session where, in small groups (consisting of 6-8 individuals), participants completed an activity with support from a table recorder, who captured their discussion on a second worksheet that prompted participants to:

1. Reflect upon and discuss key issues you are observing within your role in the gambling landscape.
2. Consider what issues could be prioritized by safer gambling stakeholders across New England and why.
3. What supports could be of value to enable action on these key issues? (e.g. information / research, funding, capacity building, regulations, education and awareness)

After a brief large group share-back, participants engaged in a final individual reflection, where they articulated their perspectives to the following questions on a third worksheet:

1. Based on your conversations today, what do you see as the future of sports betting in New England?
2. What are the highest priorities for harm reduction from your perspective?
3. What do you need to support this work going forward?
4. What do you plan to do next?

The worksheets from the morning and afternoon sessions were collected by staff from the Massachusetts Council, who then scanned these sheets and sent them to Greo. Greo received five (5) small group reflection sheets and 50 individual worksheets. Content analysis was conducted by the team at Greo to identify prevalent themes in the insights shared by participants.

The feedback and information shared by conference attendees during the interactive sessions are outlined below. Each section is inspired by questions from the worksheets and highlights the main themes and responses.

Participant insights on the topics discussed

The Future of Sports Betting in New England

Through individual reflections, about half of the participants that shared their thoughts stated that they expect the future of sports betting in New England to continue expanding exponentially [n=18]. Many participants expressed concerns about this trend, linking the increase in sports betting to a growing public health issue that will have negative consequences [n=13]. Specifically, participants are worried that the youth demographic is particularly at risk of developing problem-gambling and related mental health issues [n=7]. A few participants highlighted their belief that, as sports betting and problem gambling increase, support and treatment services may not be able to keep pace, potentially straining public mental

health resources [n=4]. Additionally, some participants articulated concerns that, due to the profitability of gambling for states, further legalization of online sports betting might occur to increase state revenues [n=3].

Despite these concerns, many other participants expressed optimistic perspectives about the future. Several felt there will be increased regulation that will aim to provide proper supports, including the implementation of GameSense and other responsible gambling resources within sports betting apps [n=8]. Additionally, many participants suggested that there would be opportunities for increased research, data access, funding, and collaboration amongst stakeholders [n=9]. Some people also anticipated that there would be more prevention and treatment resources available in the future [n=3].

Key Issues in the Gambling Landscape

Participants reflected together in 5 small groups on various key issues they have observed in the gambling landscape. The most common issue discussed was gambling advertising [n=4 groups]. Participants generally expressed concern over two main points:

1. The unrelenting volume of gambling advertisements.
2. Celebrity involvement in these gambling ads.

Both of these factors are perceived to contribute to normalizing gambling and increasing misconceptions, potentially leading to a higher prevalence of gambling-related harm. Additionally, participants noted a significant lack of counter-advertising or messaging campaigns that promote responsible or safer gambling practices.

Several issues around responsible or safer gambling were mentioned as well, including the stigma around responsible gambling, and seeking support [n=2 groups], a lack of awareness or understanding of supportive tools and resources [n=2 groups], and the general ineffectiveness of responsible gambling tools [n=2 groups].

Participants also noted the blurring line between game announcing and betting [n=2 groups], the engagement of youth in online gambling [n=2 groups], and insufficient approaches to monitoring impacts on the population through data surveillance and research in most states.

Issues to be Prioritized by Safer Gambling Stakeholders Across New England

Participants suggested several priorities for safer gambling stakeholders across New England in their individual reflections. The top priority identified is to create more prevention, education, and support programs for youth [n= 23]. Participants recommended implementing prevention and education campaigns in middle

schools, high schools, and colleges. It was suggested that the education campaigns should cover topics such as gambling literacy, the harms of pay-to-play gaming, gambling harms, general financial literacy, and supports available. Additionally, participants emphasized the importance of peer support programs and the availability of youth counseling.

Outside of youth education programs, participants indicated the importance of public education campaigns and resources on problem gambling and its harms [n=9]. They suggested increasing efforts to raise awareness about existing positive play tools, such as GameSense and responsible gambling initiatives [n=7].

Participants also highlighted the need for stricter regulations on advertising, particularly by restricting celebrity endorsements and creating counter-message advertisements that promote safer gambling [n=8].

Additional priorities that were identified include allocating funding for support, prevention, and treatment programs [n=7], implementing a national self-exclusion scheme to assist individuals experiencing gambling-related harm [n=6], and conducting research on specific demographics and at-risk populations to address their needs more effectively [n=4].

Supports to Enable Action

Although participants mentioned various supports, funding was the most cited support required for enabling action [n=22]. Participants also stressed the importance of collaboration and partnerships across community, jurisdictional, legislative, and regulatory levels [n=7]. Additionally, participants highlighted the need for more information, resources, and training materials for priority populations [n=5]. Learning opportunities, such as this conference and other webinars, are also deemed important [n=5].

Other supports mentioned included government interest in gambling prevention and treatment [n=3], further research on gambling harms [n=3], data-sharing [n=3], and community-based and peer support [n=3].

Anticipated Actions from Participants

Participants generally expressed that their next steps would involve taking the ideas, conversations, and lessons from the conference back to their work (n=7). A prevalent theme among their responses is the intention to continue their current efforts. Some participants explicitly mentioned they plan to "keep doing the work" (n=6). Others detailed specific actions they intended to take, such as:

- Continuing to spread awareness on gambling harms and available support [n=7].

- Continuing to treat and counsel clients [n=6].
- Continuing to advocate for underserved and at-risk populations, including Black, Indigenous, and other people of color (BIPOC), Spanish/Latino communities, and young people [n=7].
- Continuing to educate themselves, learn more, and receive further training on problem gambling and preventative measures [n=5].

Key takeaways from the interactive sessions

While participants generally foresee exponential growth in the future of sports betting in the Northeast, there is no unanimous agreement on the potential impacts. Many participants voiced concerns about its potential impact on public health, particularly increased negative mental health consequences in the absence of sufficient public resources for response. Alternatively, many view the industry growth as an opportunity to prompt increased regulation and increased allocation of resources towards prevention, treatment support, and further research.

Participants widely concurred that a significant issue in the current gambling landscape is the high saturation of gambling advertisements, often featuring celebrities. This is concerning to people because it continues to normalize gambling, increase misconceptions, and can lead to gambling-related harm. They expressed a need for advertising restrictions, and the implementation of counter-advertising to promote safer gambling.

Many participants agreed that a priority issue for gambling stakeholders is the development of prevention, education, and support programs that target youth. They advocated for these programs to be implemented in middle schools, high schools, and colleges, with a focus on financial and gambling literacy. In addition to youth, participants highlighted the importance of extending educational initiatives to the broader public, so that there is more general awareness about gambling harms and support available amongst the population.

Finally, many participants agreed that while collaboration, data-sharing, government interest, further research, and additional resources are all important, sufficient funding is ultimately the most critical support needed for their work.

Conclusion and next steps

Participants plan to actively apply the insights and knowledge gained from the conference to their ongoing work, with a strong emphasis on continuing existing efforts in raising awareness, providing treatment, advocating for at-risk populations, and pursuing further education and training on gambling-related issues.

The future of sports betting in the Northeast is unfolding at a rapid pace and the insights shared and connections fostered at the '*Using Research to Rewrite the Playbook: Examining the Social Impacts of Sports Betting and the Changing Gambling Landscape*' conference will support stakeholders in their work to prevent and mitigate gambling-related harm in the region as well as demonstrate their leadership more broadly.



TO: Interim Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner

FROM: Carrie Torrisi, Deputy General Counsel
Mina Makarious, Anderson & Krieger

DATE: July 11, 2024

RE: Ohio Regulatory Amendments Regarding Sports Wagering Promotions Linked to Non-gaming Transactions and Proposed Amendments to 205 CMR 256

On June 18, 2024, the Ohio Casino Control Commission (the "OCCC") voted to amend Ohio Administrative Code to prohibit sports wagering operators who also conduct other non-gaming related businesses from promoting sports wagering to individuals under the age of 21 via promotions and bonuses from those non-gaming related businesses. The Ohio regulation is still being finalized under the state's regulatory process.

The Commission expressed an interest in exploring imposing similar protections in Massachusetts. The most likely home for such restrictions would be in the Commission's sports wagering advertising regulations, 205 CMR 256.00: *Sports wagering advertising*. As noted in the April 30th, 2024, memorandum to the Commission, 205 CMR 256 already contains various protections for individuals under the age of 21, including requiring certain conspicuous notifications about the age requirement and bans on certain content, advertising locations, or endorsements aimed at minors. Section 256.07: *Self-excluded persons*, has similar protections aimed at self-excluded individuals. Should the Commission find that regulations specifically addressing promotions and bonuses are also necessary, several options are provided below.

Section I below summarizes the comments that the Commission received from sports wagering operators in response to the prior discussion on proposed regulations. Section II lays out the key concepts that the Commission might consider in reviewing the proposed regulations. These elements are utilized in various combinations in the proposed regulations shown in Section III.

I. Operators' Comments

The Commission sought comments from the sports wagering operators licensed in Massachusetts. A few themes emerged in the operators' responses; namely, the following:

- In general, operators do not find the proposed regulations necessary, for the reasons discussed in the introduction above. Some also argue that the proposed regulations would not further the Commission’s responsible gaming aims because the current method of advertising to an operator’s non-gaming purchaser base is less likely to promote problem gaming, as the majority of purchasers of the operators’ non-gaming products are over the age of 21 and already have a high propensity to be interested in sports wagering. Operators argue that the proposed regulations will result in them being forced to market through other channels that will actually lead to an increase in the number of underage or vulnerable viewers.
- Operators sought clarification regarding how closely tied a non-gaming, consumer transaction must be to a promotion or bonus to trigger age and identity verification requirements. Operators prefer limiting the regulations’ application to promotions or bonuses that are directly contingent upon a non-gaming consumer transaction (spend “X” on non-gaming product, get “Y” in bonus bets).
- Operators would prefer that the new regulations not apply to promotions advertised to an individual *solely* on the basis of that person reaching a “transaction success page.” Operators argued that those advertisements, which are usually randomized digital banner advertisements that have no connection with a consumer’s previous actions (i.e., purchasing a non-gaming service or product), are no different from other forms of digital advertising on the internet and thus do not warrant additional regulation.
- Operators do not want regulations to apply to promotions or bonuses offered to individuals who are on a third-party marketing list because of a previous non-gaming transaction.
- Operators argue that the new regulations should not include a verification standard as such a standard would not be implementable. Operators prefer a “commercially reasonable efforts” standard.

II. Key Concepts

The table below summarizes key measures that the Commission could include in a regulation, with varying degrees of stringencies to address concerns regarding non-sports wagering promotions.

	Option #1	Option #2	Comments
What is the definition of “in connection with/ as a result of”?	Where a purchase triggered, automatically or not, notification to the consumer of the promotion, or where the operator has access to the consumer’s information because of a purchase.	Where a purchase automatically triggered the notification to the consumer regarding the promotional bet.	Option #1 would prohibit even promotions with a more tenuous connection to the consumer purchase.

	Option #1	Option #2	Comments
What method of protecting vulnerable populations must operators use? What is the burden on operators?	The promotion must not target individuals under 21 or other enumerated vulnerable individuals.	The promotion must be offered only when an operator has engaged in commercially reasonable efforts to ensure the receiving individuals are not among the enumerated vulnerable populations.	Operators have raised concerns about complying with a requirement that prevents targeting if they are not able to determine whom ads reach. This concern is addressed by both the intentionality inherent in the word “target” and in Option 2 by requiring only commercially reasonable efforts.
Does timing affect whether a promotion is offered “in connection with” a purchase?	Do not include any provision regarding timing.	A promotion/ bonus is not in direct connection with or as a direct result of a non-gaming transaction if it is offered greater than six months after the consumer engaged in the triggering non-gaming transaction.	A bonus/ promotion offer made to the consumer after a period of time may not have the same effect on a consumer’s interest in sports wagering as an offer made upon purchase.
Should the regulation prohibit generally available digital offers that happen to be shown on the “transaction completed” page?	Yes. Individuals may be more vulnerable when they have <i>just</i> made a purchase from the operator.	No-- promotions on the transaction completed page shouldn’t be additionally regulated where those exact same promotions are available elsewhere without a triggering consumer purchase.	

III. Proposed Regulations

Proposed Regulation #1

The following regulation contains the broadest protections of any of the proposed regulations. Under this regulation, operators would have to meet somewhat stringent requirements in order to offer bonuses or promotions.

A sports wagering operator must not offer any promotion or bonus in connection with, or as a result of, a non-gaming consumer transaction, unless the promotion or bonus:

- 1) Does not target individuals under the age of twenty-one, other individuals who are ineligible to participate in sports wagering, individuals with gambling problems, or other vulnerable individuals as defined in 205 CMR 256.06;
- 2) Is offered only to individuals who have been verified as being twenty-one years of age or older and not participating in the Massachusetts Voluntary Self Exclusion Program under 205 CMR 233.00; and
- 3) Otherwise complies with the requirements in 205 CMR 256.00: Sports Wagering Advertising.

For the purposes of this section, the term “in connection with or as a result of” shall mean where the commercial purchase triggered, automatically or not, the notification to the consumer regarding the promotional bet, including where the consumer’s name or contact information was a mailing list (or similar consumer outreach tool) because of a non-gaming commercial purchase.

This regulation does not prohibit a sports wagering operator from operating a consumer loyalty program approved by the Executive Director of the Commission.

Proposed Regulation #2:

The following regulation is more of a middle ground that applies only to promotional or bonus offers more directly triggered by a non-gaming consumer purchase, but still requires an operator to ensure that promotions aren’t reaching vulnerable individuals.

A sports wagering operator must not offer a promotion or bonus in direct connection with, or as a direct result of, a non-gaming consumer transaction unless the promotion or bonus:

Does not target individuals under the age of twenty-one, other individuals who are ineligible to participate in sports wagering, individuals with gambling problems, or other vulnerable individuals as defined in 205 CMR 256.06;

Is offered only to individuals who have been verified as being twenty-one years of age or older and not participating in the Massachusetts Voluntary Self Exclusion Program under 205 CMR 233.00; and

Other complies with the requirements in 205 CMR 256.00.

For the purposes of this section, the term “in direct connection with or as a direct result of” shall mean where the commercial purchase automatically triggered the notification to the consumer regarding the promotional bet.

A promotion or bet shall not be considered offered “directly in connection with or directly as a result of” a non-gaming consumer transaction if it is offered to the consumer more than six months after the consumer engaged in the triggering non-gaming transaction.

This regulation does not apply to promotion or bonus offers that are generally available offers but that happen to appear on a transaction completed page (or any other page in the series of pages a user encounters in purchasing a consumer item).

This regulation does not prohibit a sports wagering operator from operating a consumer loyalty program approved by the Executive Director of the Commission.

Proposed Regulation #3:

The following regulation only requires that operators use commercially reasonable efforts to prevent certain vulnerable individuals from automatically receiving a gaming promotion or bonus after purchasing a non-gaming item.

A sports wagering operator must not offer a promotion or bonus in direct connection with or as a direct result of a non-gaming consumer transaction unless the promotion or bonus is offered only when the sports wagering operator has engaged in commercially reasonable efforts to ensure the individuals receiving the promotion or bonus are twenty-one years of age or older and not participating in the Massachusetts Voluntary Self-Exclusion Program under 205 CMR 233.00.

For the purposes of this section, the term “in direct connection with or as a direct result of” shall mean where the commercial purchase automatically triggered the notification to the consumer regarding the promotional bet.

This regulation does not prohibit a sports wagering operator from operating a consumer loyalty program approved by the Executive Director of the Commission.

3775-16-09 Promotions and bonuses.

A) Unless otherwise restricted or prohibited under Chapter 3775. of the Revised Code and the rules adopted thereunder, sSports gaming proprietors may offer promotions and bonuses.

(B) The promotion or bonus rules must be clear and unambiguous, and include:

- (1) Date and time the promotion or bonus is active and expires;
- (2) Rules of play;
- (3) Nature and value of prizes or awards;
- (4) Eligibility restrictions or limitations;
- (5) Wagering and redemption requirements, including any limitations;
- (6) Eligible events or wagers;
- (7) Cancellation requirements; and
- (8) Terms and conditions that are full, accurate, concise, transparent, and do not contain misleading information.

(C) Promotions or bonuses described as free or risk-free must not require the patron to incur any loss or risk their own money to use or withdraw winnings from the free wager.

(D) Promotions or bonuses may require promotion or bonus funds be played through in order to be withdrawn but must not restrict the patron from withdrawing their own funds or withdrawing winnings from wagers placed using their own funds.

(E) Sports gaming proprietors must make the promotion or bonus rules available to patrons and the commission.

(F) Sports gaming proprietors must have procedures for the issuance, acceptance, and tracking of promotions or bonuses.

(G) Sports gaming proprietors must not offer a promotion or bonus in connection with or as a result of a non-gaming, consumer transaction unless the promotion or bonus:

1) Does not target individuals under the age of twenty-one, other individuals who are ineligible to participate in sports gaming, individuals with gambling problems, or other vulnerable individuals;

2) Is offered only to individuals who have been verified as being twenty-one years of age or older and not participating in the Ohio Voluntary Exclusion Program; and

3) Complies with the requirements in rule 3775-16-08(C) of the Administrative Code.

(H) Paragraph (G) does not prohibit a sports gaming proprietor from participating in a consumer loyalty program, as approved by the executive director.

(GI) A sports gaming proprietor must cease the offering of a promotion or bonus upon discovery that the promotion or bonus fails to comply with this rule or if required by the executive director because the promotion or bonus fails to comply with Chapter 3775. of the Revised Code or the rules adopted thereunder or otherwise undermines the integrity of sports gaming.



Massachusetts Gaming Commission
Carrie Torrisi, Deputy General Counsel
101 Federal Street, 12th Floor
Boston Massachusetts 02110
Sent via electronic mail

Re: Non-Gaming Promotion Restriction

June 10, 2024

Dear Attorney Torrisi,

On behalf of FBG Enterprises Opco, LLC ("FBG"), I write to provide feedback on the Massachusetts Gaming Commission's ("MGC") considered adoption of a non-gaming promotional restriction related to post-purchase transactions. In your May 16, 2024 email to industry operators, you noted that the MGC is contemplating adopting a rule similar to the draft promotional restriction the Ohio Casino Control Commission ("OCCC") put forward last year for review and industry comment. As you are aware, FBG previously provided feedback on the OCCC's draft rule, and we reiterate some of those prior points in this letter. To summarize, while we cannot comment on how adoption of such a rule will impact other operators, when applied to FBG's business model, we have two distinct concerns: 1) the rule would not further responsible gaming aims or policy goals related to marketing to ineligible patrons, and may in fact introduce more harm in that regard, while also potentially disadvantaging FBG based on its core marketing strategy; and 2) the scope of the draft rule put forward in Ohio creates ambiguity around how it is to be implemented.

The rule would not further responsible gaming aims or ineligible patron marketing policy goals

The MGC is aware that a core element of FBG's business strategy is to promote sports wagering to sports fans at moments when they're engaging with their favorite teams and players, largely through our unique access to visitors and purchasers of e-commerce platforms



operated by our affiliate entity, Fanatics, LLC (“Fanatics Commerce”).¹ As such, FBG promotes its sports wagering platform to Massachusetts-based customers of Fanatics Commerce in compliance with applicable rules in *205 CMR 256: Sports Wagering Advertising*. We feel strongly that this marketing approach is not only a sound business decision for our Company, but also a safer and lighter touch means of reaching new customers as compared to the tactics used by some of our competitors to blanket the airwaves and venues with sports-betting ads during sporting events. Our statistical analysis of the Fanatics Commerce purchaser base reveals that the overwhelming majority of Fanatics Commerce purchasers are 21 or older, and they have a high propensity to be interested in or currently engaged in sports wagering, making this customer pool a safe and logical place for FBG to invest marketing resources. Philosophically, FBG disagrees with the notion that promoting sports wagering to customers of the wider Fanatics business introduces incremental risks to the Commonwealth that are not at least equally present through other means of marketing to non-gaming patrons, like paid social media ads or television commercials.

We must promote our business in order to remain competitive in the market. Should the MGC adopt a rule restricting FBG’s ability to market sports wagering to Fanatics Commerce customers, we will need to shift more marketing resources to other channels, such as television commercials, billboards around stadiums, print media, and other forms of advertising. Given what we know about Fanatics Commerce customer age demographics, and the controls we’re able to implement in direct marketing to this in-house database (e.g., age and self-exclusion suppression for emails), FBG is confident that increasing our marketing efforts through other channels will lead to an increase in the number of underage or vulnerable persons viewing those promotions rather than a decrease.

Given this background, FBG has worked closely with the OCCC over the past year on their consideration of such a rule. We worked not just to comment on the text of the rule, but to align with their staff on a plan for compliance such that, were the draft rule to be adopted, FBG

¹ This is not a marketing tactic unique to FBG – our competitors also engage in similar third-party database marketing efforts. FBG can provide examples of similar competitor marketing upon request.



may continue marketing FBG to Fanatics Commerce customers, with the understanding that a certain types and means of offers would not be allowed in Ohio. We are proud of the work we've done with OCCC staff on this issue, and are comfortable in our ability to comply with the OCCC's intended scope of the draft rule should it be adopted. But we are also conscious that MGC could adopt a near-identical rule as OCCC, but take a much broader interpretation of the application of the rule, putting FBG's ability to compete with more established sports wagering operators in the Commonwealth at risk.

Should the MGC believe a new rule is necessary to restrict promotional marketing to customers of certain industries or specific businesses that raise a tangible concern around the number of underage and/or vulnerable persons receiving those advertisements, FBG would support that effort. However, for the reasons mentioned above, we believe a blanket restriction on non-gaming promotions will actually cause more unintended advertising to youth and vulnerable persons, while also potentially putting our business model at risk. Therefore, we do not believe adoption of a new rule is necessary, or in the best interests of the Commonwealth. However, in the event that MGC deems it necessary to adopt a new rule, our comments below provide suggestions on how the rule could be better crafted to reduce confusion around implementation.

The rule as drafted creates ambiguity around how it is to be implemented by operators

As outlined in the comments FBG provided to OCCC in a letter dated November 30, 2023, FBG believes the OH draft rule as currently drafted creates ambiguity in how the draft rule is to be implemented. As mentioned above, we have worked closely with OCCC staff, and believe their draft restriction is intended to be narrower than how one may read their current draft rule. Specifically, we recommended the following changes to the OH draft rule:

- The scope of the rule should be clarified to make clear that “in connection with or as a result of a non-gaming transaction” is implicated only when operators trigger gaming marketing concurrent with a non-gaming transaction;



- The rule should allow for marketing of generally available gaming offers to non-gaming transactors, so long as those offers are not tailored to the transaction (e.g., a standard banner ad reminding a customer of a headline acquisition offer is allowed);
- The rule should not include a “verification” standard for age and self-exclusion status as it is impossible for operators to verify such information without patron PII. Rather, a commercially reasonable efforts standard should be used.

We thank the MGC staff for the opportunity to comment on this proposed rule, and we stand ready to address any questions related to this letter.

Fanatics Betting & Gaming



Cory Fox
cory.fox@fanduel.com

June 10, 2024

Via Email to caroline.torrissi@massgaming.gov
Carrie Torrissi, Deputy General Counsel
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: FanDuel comments on potential amendments related to non-gaming promotions.

Dear Deputy General Counsel Torrissi:

I write to provide comments on behalf of FanDuel Group, Inc. (“FanDuel”) regarding the Massachusetts Gaming Commission’s (“Commission”) consideration of potential amendments related to non-gaming promotions. Per the Commission’s direction, the potential amendments would be similar to a proposed regulation in Ohio (Ohio Adm. Code 3775-16-09). Based on our extensive experience as an operator in the online sports betting, casino gaming, and fantasy sports industries and collaborator with regulators of sports betting in many states in the development of their regulations, we offer constructive feedback on the Commission’s consideration of the proposed amendments to its regulations.

We thank the Commission for taking the time to review our concerns and consider the significant impacts the proposed amendments may have. As the Commission may be aware, FanDuel submitted comments to the Ohio Casino Control Commission (“OCCC”) in November 2023, when the OCCC initially proposed Adm. Code 3775-16-09. In that comment, we requested clarification on the scope of the promotions and bonuses which would fall within the regulation.

The text of the proposed amendments is ambiguous as to how directly the “non-gaming, consumer transaction” must be to the promotion or bonus in order to trigger the age and identity verification requirements of the proposed amendments. We suggested that clarification be added to the proposed amendments to limit the scope to situations where promotions or bonuses are directly contingent upon the non-gaming consumer transaction (*e.g.*, spend “X” on a non-gaming product/service, and get “Y” in bonus bets/promotional credits/other benefit), as opposed to including any promotion or bonus advertised to an individual solely by virtue of them reaching a transaction success page or being on a marketing list of a third-party with whom they may have had a non-gaming consumer transaction with at some point previously.

Many promotions that appear following non-gaming, consumer transactions are randomized digital banner advertisements which should not be prohibited by the considered amendment to the regulations. These advertisements have no connection with consumers' previous actions on the sites where they are initiating the transaction, and are no different than many other forms of digital advertising that consumers see on the Internet. These advertisements are uniform and are not personalized to any one consumer. For example, a consumer initiating a transaction may see a nationwide promotion from an operator for all customers on advertising space made available on the transaction success page; in this instance, the consumer is not being offered a promotion that is linked to the transaction they just completed. Consumers are neither directly targeted by these types of advertisements nor incentivized with personalized offers or promotions because of the random nature of when the advertisements appear.

We believe that the Commission's current marketing and advertising regulations sufficiently protect the interests of the Commonwealth while affording sports wagering operators with meaningful avenues to grow the legal sports wagering market. Should the Commission wish to proceed with the proposed amendments, we suggest that the text be narrowly tailored to address the specific concerns the Commission might have. In the 2023 OCCC comments, FanDuel included preferred and alternative language suggestions, which we have included here as well for convenience. All of FanDuel's suggested changes will be shown as follows: proposed additional text will be bolded and underlined and all text to be deleted will be bolded, bracketed, and struck through. For the sake of clarity our suggested edits will be in red, and the OCCC's edits will be in black.

PREFERRED:

Section 3775-16-09(G):

(G) Sports gaming proprietors must not offer a promotion or bonus **directly** in connection with or **directly** as a result of a non-gaming, consumer transaction unless the promotion or bonus:

- 1) Does not target individuals under the age of twenty-one, other individuals who are ineligible to participate in sports gaming, individuals with gambling problems, or other vulnerable individuals;
- 2) Is offered only to individuals who have been verified as being twenty-one years of age or older and not participating in the Ohio Voluntary Exclusion Program; and
- 3) Complies with the requirements in rule 3775-16-08(C) of the Administrative Code.

ALTERNATIVE:

Section 3775-16-09(G-I):

- (G) Sports gaming proprietors must not offer a promotion or bonus in connection with or as a result of a non-gaming, consumer transaction unless the promotion or bonus:
- 1) Does not target individuals under the age of twenty-one, other individuals who are ineligible to participate in sports gaming, individuals with gambling problems, or other vulnerable individuals;
 - 2) Is offered only to individuals who have been verified as being twenty-one years of age or older and not participating in the Ohio Voluntary Exclusion Program; and
 - 3) Complies with the requirements in rule 3775-16-08(C) of the Administrative Code.
- (H) Paragraph (G) does not prohibit a sports gaming proprietor from participating in a consumer loyalty program, as approved by the executive director.
- (I) **Paragraph (G) only applies to promotions or bonuses where receipt of the promotion or bonus is directly conditioned upon one or more specific non-gaming consumer transactions.**

We appreciate your time and consideration of our comments and would be happy to discuss at your convenience.

Sincerely,



Cory Fox

Vice President for Product and New Market Compliance



June 10, 2024

Sent Via Email: caroline.torrissi@massgaming.gov

Carrie Torrissi
Deputy General Counsel
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, Massachusetts 02110

RE: MA Feedback on Post-Transaction Advertising

Dear Deputy General Counsel Carrie Torrissi,

In response to proposed changes discussed by the Massachusetts Gaming Commission (“the Commission”) at its April 30, 2024 meeting, Crown MA Gaming LLC (“DraftKings”) submits the following comments for consideration. As a leading sports gaming operator in the United States and a licensed sports wagering operator in Massachusetts, DraftKings has firsthand experience with regulatory frameworks and submits these comments based on its operational knowledge in multiple regulated jurisdictions. We appreciate the Commission’s willingness to receive comments from impacted stakeholders and its collaborative approach to the rulemaking process.

Post-Transaction Advertising

Comment: DraftKings respectfully requests clarification related to the Commission’s proposed rulemaking concerning post-transaction advertising. We share the Commission’s intent to create a safe and successful regulated sports wagering market in Massachusetts and we recognize the important role responsible marketing plays in establishing and protecting the integrity of legal sports gaming. However, DraftKings could have concerns with the potential scope of the proposed rule, in particular section (G)(2) of the draft Ohio rule shared with operators.

Ohio Language:

G) Sports gaming proprietors must not offer a promotion or bonus in connection with or as a result of a non-gaming, consumer transaction unless the promotion or bonus:

1) Does not target individuals under the age of twenty-one, other individuals who are ineligible to participate in sports gaming, individuals with gambling problems, or other vulnerable individuals;

*2) Is offered only to individuals who have been verified as being twenty-one years of age or older and not participating in the Ohio Voluntary Exclusion Program;
and*

This rule would introduce a requirement for sports wagering operators to “verify” the age and voluntary self-exclusion status of consumers *prior* to offering otherwise lawful promotions or bonuses to those individuals. Read literally, a “verification” standard could require sports wagering operators to conduct know-your-customer (“KYC”) data collection and verification, which players submit to upon establishing a sports wagering account, prior to advertising to Massachusetts consumers. One way the Commission may consider addressing this could be to require operators to make commercially reasonable efforts to verify consumer information prior to advertising to potential Massachusetts consumers.

The term “verified” in this context may cause unintended industry and regulator friction in implementation. As required under law and regulation, operators always “verify” a Massachusetts player’s eligibility when registering for an account by collecting multiple pieces of data, including date of birth, at least the last four digits of the player’s Social Security Number, and then matching the same via third-party KYC providers against official record databases. In contrast, the collection of such personally identifiable information is essentially unheard of in any type of consumer transaction, and as such a third-party business would likely be unable to accurately “verify” the age or voluntary self-exclusion status of an individual in a non-gaming transaction. Depending on the Commission’s interpretation, a verification standard could serve to effectively prohibit *any* form of generalized promotional marketing to non-gaming consumers,

Additionally, many of the policy concerns this regulation aims to address are already addressed in the Commission’s current regulations, as sports wagering operators are prohibited from advertising to youth (205 CMR 256.05), including prohibitions on targeting individuals under 21, on utilizing content designed to appeal to individuals under 21, and on advertising to any broader audience where 25% or more of that audience is reasonably expected to be under 21. Further, sports wagering operators are prohibited from targeting advertising towards individuals or groups at elevated risk of gambling addiction (205 CMR 256.06(1)) and those participating in the voluntary self-exclusion program (205 CMR 256.07).

For this reason, we respectfully request clarification on this proposed language – chiefly, how the Commission interprets and intends to apply the term “verified.” Balancing the Commission’s intent with the practical realities operators face in marketing legal sports wagering, we respectfully submit that if Massachusetts plans to adopt language similar to the Ohio draft, the Commission consider modifying it to comport with a commercially reasonable efforts standard. Such a standard would still impose upon sports wagering operators a meaningful obligation to take efforts to suppress promotional marketing to ineligible consumers as the Commission intends, while not creating a standard that may be nearly impossible to meet.

* * * * *

Thank you for your consideration of DraftKings' comments regarding the Commission's proposed changes to post-transaction advertising. Please feel free to contact us should you or anyone else at the Commission have any questions about our submission.

Sincerely,

DraftKings, Inc.



Massachusetts Gaming Commission
Carrie Torrisi, Deputy General Counsel
101 Federal Street, 12th Floor
Boston Massachusetts 02110
Sent via electronic mail

Re: Non-Gaming Promotion Restriction

June 27, 2024

Dear Attorney Torrisi,

Following our letter submission on June 10, 2024 related to potential non-gaming promotion restrictions, you wrote to us with a follow-up question. Please find that question, and our response, below.

Can you provide a bit more detail as to what sort of controls you would be able to implement to ensure that such non-gaming promotions were offered only to individuals who have been verified as being 21 or older and who are not enrolled in the VSE program.

The controls available vary by the method of transmitting a promotional offer. For general promotional offers that are presented to *all* patrons on an app/website, (e.g., a banner ad a person sees on a sports website saying Sign Up and Get X), we do not employ specific age/exclusion gating controls. We believe this is similar to how other operators handle general site advertising given the fact that users generally browse internet sites anonymously, and these ads are viewable by all visitors (i.e., everyone who visits the Bleacher Report sees a certain promotional ad). Rather, our marketing, legal and compliance teams review both the digital marketing assets themselves, and the site(s) where they are proposed to be displayed, for compliance with applicable gaming rules, to include 205 CMR 256:05-06.



We take the same approach for other promotional offers that are displayed to Fanatics customers on app/on website immediately following a purchase. We believe this is also standard industry practice, as our competitors engage in similar post-transaction marketing efforts, such as pop-up offers after ordering a ride with Uber. As you are aware, few if any commercial transactions involve a purchaser sharing, and a non-gaming business verifying, a person's DOB, SSN, or other key PII needed to verify someone's age or self-exclusion status in real time. It is therefore nearly impossible in almost all cases for a sports wagering operator to advertise in third-party digital spaces, pre-or-post transaction, and attest that everyone seeing those offers are 21+ and not self-excluded. The same of course is true for advertising via television commercials, in-stadium billboards, and a host of other means of marketing.

We believe our approach aligns with existing regulations, and as mentioned in our prior letter, we have shown that Fanatics.com purchasers are overwhelmingly 21 or older. That is one of the reasons why we do not believe serving a promotional offer online to any person clicking "purchase" on [Fanatics.com](https://www.fanatics.com) triggers a heightened obligation to check age and exclusion status, especially when that obligation does not exist for other forms of marketing. Indeed, data indicates that upwards of 10% of viewers of televised sporting events are minors, but, as you know, sports betting is widely advertised with promotional offers backed by celebrities during games. As also noted in our letter, if we were to shift marketing resources from the Fanatics purchaser audience to other channels - like those who watch sporting events - we believe we would actually increase the risk that an ineligible patron would see our marketing.

As we worked through this topic with the Ohio Casino Control Commission (OCCC), we realized their concern was not with the general idea that FBG, for instance, would market sports betting to Fanatics purchasers, but rather, with specific promotional marketing tactics. While we will refrain from publicly disclosing details of the conversations we had with the OCCC, we can say our constructive dialogue with their staff yielded an outcome that allows FBG to execute its marketing strategy in a manner that the OCCC deems acceptable. We do not believe FBG's marketing strategy raises a need for the MGC to consider adoption of additional advertising



restrictions, but should the Commission deem it necessary, we would seek to have an equally constructive dialogue with MGC staff to reach a positive outcome.

Fanatics Betting & Gaming



Josh Mehta
josh.mehta@fanduel.com

June 28, 2024

Via Email to caroline.torrissi@massgaming.gov
Carrie Torrissi, Deputy General Counsel
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: FanDuel comments on potential amendments related to non-gaming promotions.

Dear Deputy General Counsel Torrissi:

I write to provide a response on behalf of FanDuel Group Inc. (“FanDuel”) regarding the Massachusetts Gaming Commission’s (“Commission”) supplemental request for information on June 21.

Can you provide some detail as to what sort of controls you would be able to implement to ensure that any such non-gaming promotions were offered only to individuals who have been verified as being 21 or older and who are not enrolled in the VSE program.

Where FanDuel or its marketing partners actually know the identity of the recipients of a direct advertisement (e.g., in a direct communication via email), the distribution list would be chosen with filters in place to prevent underage or excluded individuals from being directly targeted. As described in our comments, many of the promotions that appear following non-gaming consumer transactions are not targeted advertisements, but rather digital banner advertisements that are no different than the many forms of digital advertising that consumers see elsewhere on the Internet. Similar to other placements, FanDuel uses third party data sets that pull directly verified or inferred age data points to apply an age-based targeting layer for assets such as these that are not targeted to specific individuals, when available. These assets are targeted to segments of users who are known to be 21+, or where there is a reasonable expectation that a significant portion of the audience is 21+ if age is unknown. FanDuel has an internal quality assurance process during marketing campaign creation to ensure any available targeting mechanism is applied prior to the assets being made available.

The availability of targeting capabilities varies from placement-to-placement, but FanDuel complies with the requirements of 205 CMR 256.05 which acknowledges that “targeted controls” may not always be available. FanDuel also includes 21+ and responsible gaming messaging to



ensure that recipients understand the requirements to participate in legal sports wagering in the Commonwealth, and have a resource for assistance available if they have trouble controlling their play. For the avoidance of doubt, FanDuel does not (i) advertise “exclusively or primarily to individuals or groups of people that are at moderate or high risk of gambling addictions”, (ii) “use characteristics of at-risk or problem bettors to target potentially at-risk or problem bettors with advertisements”, or (iii) advertise in a manner that is “aimed at persons who have enrolled in a Self-exclusion Program”.

We appreciate your time and consideration of our comments and would be happy to discuss at your convenience.

Sincerely,

Josh Mehta
Director, Legal & Regulatory Affairs



July 5, 2024

Sent Via Email: caroline.torrissi@massgaming.gov

Carrie Torrissi
Deputy General Counsel
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, Massachusetts 02110

RE: MA Feedback on Post-Transaction Advertising

Dear Deputy General Counsel Carrie Torrissi,

In response to proposed changes discussed by the Massachusetts Gaming Commission (“the Commission”) at its April 30, 2024 meeting, and a followup question from the Commission, Crown MA Gaming LLC (“DraftKings”) submits the following comments for consideration. As a leading sports gaming operator in the United States and a licensed sports wagering operator in Massachusetts, DraftKings has firsthand experience with regulatory frameworks and submits these comments based on its operational knowledge in multiple regulated jurisdictions. We appreciate the Commission’s willingness to receive comments from impacted stakeholders and its collaborative approach to the rulemaking process.

Post-Transaction Advertising

Comment: Draftkings’ understanding of the Commission’s intent in its proposed rulemaking is specifically to deal with cross-vertical post-transaction advertising by sports wagering operators. That is if a patron completes a transaction with a sports wagering operator in one vertical, that operator should not target an advertisement to that patron in another vertical without verifying that patron is of legal wagering age and is not on the voluntary exclusion list.

DraftKings would have a concern, as reflected in our first letter on this topic on June 10, 2024, that broadening application of such a rule to post-transaction advertisements by third parties could functionally ban all such advertisements hosted by third parties. Though advertising placement is vetted for the appropriate audience standard of no more than 25% under 21 (per 205 CMR 256(4)(c)), those third parties may not have reason to know if any specific customer is of legal wagering age, and they would not be able to cross-reference their patrons with the voluntary exclusion list. Without this limitation, it is possible that the *only* post-transaction offers that would be allowable are cross-selling offers by sports wagering operators themselves. That seems at odds with the Commission’s prior statements of intent.

As a hypothetical example, say a sports wagering operator partners for post-transaction promotional offers with a third party company that offers personal computer security software. After a person completes a transaction with the software company, they are displayed a series of advertisements that could include a generic promotional offer, not targeted to the specific patron, representing a generic “new patron” offer for a sports wagering operator - similar to what any person would see in a banner advertisement on a webpage. The third-party software company would not necessarily have age information for that individual, nor would they have access to that individual’s voluntary exclusion list status. This example is clearly distinct from an offer from a sports wagering operator’s other verticals, where the offer can be customized for the user based on the character and amount of the transaction, and where the operator has the ability to collect “know-your-customer” information about age and voluntary exclusion list status.

Thus, DraftKings respectfully requests that any such provision only apply to sports wagering operators’ own transactions across verticals. Secondly, if the Commission does intend to expand the scope of this discussion to cover all post-transaction advertisements by all parties, DraftKings respectfully requests that the Commission adopt a “commercially reasonable” standard for verification.

In general, the policy concerns this regulation aims to address are already addressed in the Commission’s current regulations, as sports wagering operators are prohibited from advertising to youth (205 CMR 256.05), including prohibitions on targeting individuals under 21, on utilizing content designed to appeal to individuals under 21, and on advertising to any broader audience where 25% or more of that audience is reasonably expected to be under 21. Further, sports wagering operators are prohibited from targeting advertising towards individuals or groups at elevated risk of gambling addiction (205 CMR 256.06(1)) and those participating in the voluntary self-exclusion program (205 CMR 256.07).

* * * * *

Thank you for your consideration of DraftKings’ comments regarding the Commission’s proposed changes to post-transaction advertising. Please feel free to contact us should you or anyone else at the Commission have any questions about our submission.

Sincerely,

DraftKings, Inc.



Division of Licensing

TO: Interim Chair Maynard and Commissioners O'Brien, Hill, and Skinner
FROM: David MacKay, Licensing Manager
CC: Kara O'Brien, Licensing Division Chief and Caitlin Monahan, IEB Director
DATE: July 11, 2024
RE: Encore Boston Harbor's Application for Amendment of Gaming Beverage License

Overview: Encore Boston Harbor (EBH) has applied for an amendment of its gaming beverage license to add a new leased outlet restaurant, Giardino. This is the restaurant that will occupy the space that was formerly Garden Cafe. (Area 3-16 on Encore Boston Harbor's Beverage License). Additionally, EBH seeks to change the Beverage Manager on Encore Boston Harbor's Beverage License to Brian Fountain, VP of Food and Beverage.

Standard: Under G.L. c. 23K, § 26, and 205 CMR 136.03 and 136.04, the Commission is authorized to amend the license for the sale and distribution of alcoholic beverages to be drunk on the premises of the gaming establishment.

Pursuant to 205 CMR 136.03(3), the Division of Licensing "shall review the application to determine whether it contains all of the elements required in accordance with 205 CMR 136.04."

Accordingly, "[i]f the Division of Licensing is satisfied that the application meets the requirements of 205 CMR 136.04 and M.G.L. c. 23K, § 26, and that any modifications requested in accordance with 205 CMR 136.03(2) have been satisfactorily addressed, it shall forward the application to the [C]ommission with a recommendation that it be approved."

Discussion: The Division of Licensing has reviewed the amendment application submitted by the licensee and has determined that it is complete and in conformance with all regulatory requirements.

The scope of the review also included:

- Sufficient information regarding the description of the licensed area, floor plan, and storage of the alcoholic beverages.
- Confirming that the license area manager for Encore Boston Harbor, Brian Fountain, VP of Food and Beverage, holds a valid certification from a recognized alcoholic beverage server training program is properly licensed by the Commission and is in good standing (LGKS23-0066).



Division of Licensing

- Confirming that the designee for the Jointly Responsible Person (Giardino), Nathaniel D. Boardman, holds a valid certification from a recognized alcoholic beverage server training program is properly licensed by the Commission and is in good standing (RSER22-0329).

On July 5, 2024, Luis Lozano, Casino Regulatory Manager conducted a walkthrough inspection to confirm the accuracy of the reported information, as well as the licensed area's surveillance and security. The inspection confirmed the licensed area's surveillance and security were in compliance and provided adequate coverage. Additionally, the inspection confirmed the posting requirement under 205 CMR 136.07(5)(b) was met.

RECOMMENDATION OF THE LICENSING DIVISION

After reviewing the amendment application and performing the on-site inspection, the Licensing Division recommends that the Commission approve Encore Boston Harbor's amendment application to add Giardino's licensed area to the Encore Boston Harbor gaming beverage license and change the Beverage Area Manager to Brian Fountain.



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Wynn MA, LLC

ADDRESS OF GAMING ESTABLISHMENT

1 Broadway, Everett, MA 02149

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Jacqui Krum, SVP and General Counsel

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

(857) 770-7802; jacqui.krum@encorebostonharbor.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

Please see attached.

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| <input checked="" type="checkbox"/> NEW LICENSED AREA | <input type="checkbox"/> DESCRIPTION OF LICENSED AREA |
| <input type="checkbox"/> CHANGE IN CAPACITY | <input type="checkbox"/> ALCOHOL STORAGE |
| <input type="checkbox"/> JOINTLY RESPONSIBLE PERSON | <input type="checkbox"/> CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is \$100.00

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

Please see attached.

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN:

Please see attached.

HOURS OF OPERATION

Please see attached.

CAPACITY OF LICENSE AREA

Please see attached.

WILL YOU PROVIDE BOTTLE SERVICE? YES NO IF YES, PLEASE ELABORATE

Please see attached.

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OLF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Please see attached.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Please see attached.

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

Please see attached.

ATTESTATION

I, Jacqui Krum, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Jacqui Krum

Print Name

SVP & General Counsel

Title

June 11, 2024

Date

GIARDINO – LEASED OUTLET

- **BUSINESS CONCEPT:** Seasonally driven and locally inspired casual dining.
- **DESCRIPTION:** Casual dining restaurant on the mezzanine of Garden Lobby.
- **NORMAL HOURS OF OPERATION:** 7:00 a.m. - 2:00 p.m. daily.
- **HOURS OF PERMITTED ALCOHOL SERVICE:** 8:00 a.m. - 2:00 a.m.
- **CAPACITY:** Total (248).
- **ALCOHOL DISPENSING AREA:** Distributed by bartenders, served by servers to guests in the dining room.
- **BOTTLE SERVICE:** Yes – Private Events Only.
- **STORAGE and SECURITY:** There is no guest facing bar in this venue. All liquor, beer and wine will be locked in back-of-house behind the service bar. All areas are under 24-hour daily camera surveillance.
- **MANAGER OF LICENSED AREA:** David Nathaniel Boardman (MGCS# RSER22-0329).**

** Wynn MA, LLC maintains the legal authority to monitor the jointly responsible person's compliance with and ability to remove a jointly responsible person from the gaming establishment for a violation of 205 CMR 136 in accordance with the terms of the Lease Agreement between Wynn MA, LLC and Giardino by Frank & Nick, Inc.





GAMING BEVERAGE LICENSE CHANGE OF MANAGER APPLICATION

CHANGE OF MANAGER REQUEST

NAME OF GAMING LICENSEE

Wynn MA, LLC dba Encore Boston Harbor

ADDRESS OF GAMING ESTABLISHMENT

One Broadway, Everett, MA 02149

NAME AND LICENSE NUMBER OF THE LICENSED AREA YOU ARE REQUESTING TO AMEND

Gaming Beverage License No. MGCGBL3-R1 for Wynn MA, LLC dba Encore Boston Harbor

NAME AND LICENSE NUMBER OF THE PROPOSED MANAGER OF THE LICENSED AREA

Brian Fountain

REASON FOR THE CHANGE OF MANAGER

Previous manager (Chelsea Brewster) is no longer with the company.

EXPERIENCE OF PROPOSED MANAGER

Brian Fountain has over three decades of experience in hospitality management. He has successfully ensured premier quality and service across his property's restaurants, bars, banquets, and private events. Before joining Encore Boston Harbor, Brian led successful F&B teams for Live! Casino and Hotel in Maryland, for Caesars Entertainment Corporation properties in Las Vegas and Baltimore, and leading restaurant groups, including Phillips Foods and Starr Restaurant Organization. In his current role, Brian oversees seven restaurant outlets, a Catering and Banquets division, and the Beverage Department, Brian is also ServSafe Food and Alcohol certified.

HAVE YOU REVIEWED THE REGULATIONS REGARDING THE GAMING BEVERAGE LICENSE? YES NO

DO YOU UNDERSTAND THESE REGULATIONS? (205 CMR 136 AND 205 CMR 138) YES NO

Signature

Jacqui Krum

Print Name

SVP and General Counsel

Title

July 3, 2024

Date



Division of Licensing

Beverage Area Manager Certification

I, Brian Fountain (Name), certify under the pains and penalties of perjury that I have been designated by Wynn MA, LLC dba Encore Boston Harbor (Jointly Responsible Person or Gaming Beverage Licensee) as a Manager¹, that I have reviewed G.L. 23K §26, 205 CMR 136, and 205 CMR 138, and that I understand these regulations, as well as my responsibilities thereunder. This includes, but is not limited to:

- No person may sell or distribute alcoholic beverages to be drunk on the premises of a gaming establishment except as allowed by the gaming beverage license;
- The Gaming Beverage Licensee shall not transfer a gaming beverage license, transfer operations of a licensed area to a new jointly responsible person, add a new manager or other principal representative, or add, delete or materially alter the size, configuration or use of a licensed area without the Commission's prior written approval;
- The Gaming Beverage Licensee is responsible for compliance with 205 CMR 136.00 in all licensed areas and the gaming establishment as a whole;
- At least one manager or other principal representative must be present in each licensed area at all times that alcoholic beverages are available for sale or distribution, and shall be available to the Division of Gaming Liquor Enforcement of the ABCC, the Investigations and Enforcement Bureau, the Division of Licensing, and the Gaming Enforcement Unit at any such time;
- The Gaming Beverage Licensee remains responsible for compliance with 205 CMR 136.00 within all licensed areas, including those operated by a designated jointly responsible person; and
- Failure to comply with any provision of M.G.L. c. 23K or 205 CMR 136.00, or failure to act in conformance with the Gaming Beverage Licensee's approved system of internal controls related to the service of alcoholic beverages may result in the suspension, revocation, conditioning, or assessment of a civil administrative penalty.

Signature of Beverage Area Manager

VP - Food & Beverage

Title

Brian Fountain, LGKS23-0066

Print Name and Individual License Number

June 12, 2024

Date

¹An individual who is licensed or registered in accordance with 205 CMR 134.00: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations who the gaming beverage licensee or jointly responsible person has delegated to ensure compliance with 205 CMR 136.00 and all terms and conditions of the gaming beverage license applicable in the licensed area. See 205 CMR 136.01.



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com