



**MASSACHUSETTS GAMING COMMISSION
PUBLIC MEETING #259**

January 24, 2019
10:00 a.m.

Massachusetts Gaming Commission
101 Federal Street
Boston, MA



Massachusetts Gaming Commission



**NOTICE OF MEETING and AGENDA
January 24, 2019**

Pursuant to the Massachusetts Open Meeting Law, G.L. c. 30A, §§ 18-25, notice is hereby given of a meeting of the Massachusetts Gaming Commission. The meeting will take place:

**Thursday, January 24, 2019
10:00 a.m.
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA**

PUBLIC MEETING - #259

1. Call to order
2. Approval of Minutes
 - a. January 10, 2019 – **VOTE**
3. Administrative Update – Ed Bedrosian, Executive Director
 - a. General Update
 - b. Region C Discussion
4. Legal Division, Catherine Blue, General Counsel
 - a. Final Draft Version of 205 CMR 146.00: Gaming Equipment and Amended Small Business Impact Statement – **VOTE** to Complete the Promulgation Process
5. Racing Division – Dr. Alex Lightbown, Director
 - a. 2017 Suffolk Downs Unpaid Winnings– **VOTE**
 - b. 2017 Wonderland Unpaid Winnings– **VOTE**
 - c. 2017 Plainridge Racecourse Unpaid Winnings– **VOTE**
 - d. 2017 Raynham Unpaid Winnings– **VOTE**
6. Finance Division, Derek Lennon, Chief Finance and Accounting Officer
 - a. FY2019 Massachusetts Gaming Commission Mid-Year Budget Review – **VOTE**
7. Commissioner's Updates



Massachusetts Gaming Commission

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8. Other business – reserved for matters the Chair did not reasonably anticipate at the time of posting.
9. Executive Session pursuant to M.G.L. Chapter 30A Section 21(a)(3) for the purpose of discussing litigation strategy in the case of Stephen A. Wynn v. Karen Wells, the Massachusetts Gaming Commission, Wynn Resorts Ltd., et al.

I certify that on this date, this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to: regs@sec.state.ma.us, melissa.andrade@state.ma.us.

1/22/19
Date


Edward Bedrosian, Executive Director

Date Posted to Website: January 22, 2019 at 10:00 a.m.



Massachusetts Gaming Commission

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Massachusetts Gaming Commission Meeting Minutes

Date/Time: January 10, 2019 – 10:00 a.m.

Place: Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Present: Interim Chairwoman Gayle Cameron
Commissioner Enrique Zuniga
Commissioner Bruce Stebbins
Commissioner Eileen O'Brien

Time entries are linked to the
corresponding section in the
Commission meeting video.



Call to Order

See transcript page 1

[10:00 a.m.](#) Interim Chairwoman Cameron called to order public meeting #258 of the Massachusetts Gaming Commission.

Approval of Minutes

See transcript page 1

[10:01 a.m.](#) *Commissioner Stebbins moved to approve the minutes from the December 20, 2018 Commission Meeting, subject to correction for typographical errors and other nonmaterial matters. Commissioner O'Brien seconded the motion. The motion passed unanimously.*

Administrative Update

See transcript pages 1 – 5

[10:01 a.m.](#) **General Update**

Executive Director Ed Bedrosian summarized the meeting's agenda. He noted that today's agenda has several items related to the Commission's

Region A licensee. He also reported that the Commission is still proceeding to handle the suitability review as well as Encore's construction and opening preparations simultaneously.

Encore Opening Preparations

The Commission was updated on the status of preparations for the opening of Encore. Issues such as Service Employee Exemptions and budget authorization for new gaming agents and public safety personnel at the Encore property will be discussed in today's meeting.

Service Employee Exemptions

Director Bedrosian also refreshed the Commission on the statutory change that was implemented to give the Commission discretion to exempt certain service employees from the registration process for MGM Springfield. He then recommended that the Commission review and approve the list that was compiled for Encore employees in the same regard.

There are, however, three positions at Encore that require further analysis. These positions are manager, supervisor, and technician under the Sound and Video department.

Director Bedrosian also asked the Commission if they would consider delegating discretion to him in situations where there are changes to previously approved service employee exemptions that the Commission might consider ministerial or administrative to approve those changes.

As an example, he provided that the Commission currently has a situation at Plainridge Park Casino where one of the food and beverage vendors is changing from one type of burger establishment to another type of burger establishment. The employees' positions are staying the same, and only the name of the vendor will change. The Commission had already acquired approval for the previous vendor. Ed stated that he would consider that a ministerial change that staff could bring back in front of the Commission, certainly, but for efficiency purposes, he asked that the Commission consider whether delegating to him the authority to reapprove those ministerial changes would be appropriate.

[10:12 a.m.](#)

Commissioner Stebbins moved that the Commission approve the Service Employee Registration (SER) positions be exempted for gaming service employees at Encore Boston Harbor as provided in the packet with the exception of three sound and video positions (manager, supervisor, and technician), as well as grant the Executive Director authority to make ministerial changes and exemptions going forward. Commissioner O'Brien seconded the motion.

The Motion passed unanimously.

Legal Division

See transcript pages 5 – 11

10:14 a.m. **Litigation Update**

The Commission heard a summary and update regarding the current litigation taking place in Nevada, referred to as Stephen Wynn vs. Wynn Resorts, the Massachusetts Gaming Commission, and Karen Wells. Speaking was Attorney Melissa Allison and Attorney David Mackey of Anderson and Krieger LLC, who represent the Commission in this case.

Attorneys Allison and Mackie gave an overview of the case, explaining the process that took place in front of Judge Gonzales over the last few weeks, and the results of this litigation so far.

Attorney Mackey further explained that the judge issued a preliminary ruling granting Mr. Wynn's request that certain material cannot be used in the Commission's investigative report. He stated that this order was issued by the court orally at the conclusion of a hearing, and a written order will be issued confirming this within the next several days. In the meantime, the case will continue in trial court in Nevada.

Ombudsman

See transcript pages 11 – 22

10:47 a.m. **Encore Boston Harbor Quarterly Report (3rd Quarter 2018)**

The Commission reviewed the major milestones of construction at the Encore Boston Harbor site for the third quarter of 2018. Presenting were Robert DiSalvio, President of Encore Boston Harbor, Jacqui Krum, General Counsel/Senior Vice President of Wynn Resorts International, and Peter Campot, Encore Boston Harbor Director of Construction. Mr. Campot reported that construction is on schedule and approximately 90% complete. There will be a temporary certificate of occupancy in place for Encore Boston Harbor on June 10, 2019.

Mr. DiSalvio reported that Encore Boston Harbor awarded contracts for the design phase of the casino to 13 minority-owned businesses, 14 women-owned businesses, and four veteran-owned businesses in Massachusetts.

Mr. DiSalvio also reported on the Lower Broadway District Urban Renewal Plan project, and that the Massachusetts Environmental Policy Act (MEPA) Certificate was received on December 21, 2018 regarding construction of a parking lot across the street from the property.

He also provided an update on the design and permitting of the Pedestrian Bridge, and mentioned the possible head house expansion at the MBTA

station. These projects may come together to connect Encore property to an MBTA Orange Line T stop.

Attorney Krum presented a slide presentation to the Commission illustrating recent community outreach efforts and events from 2018. She also shared a video presentation about NECAT Culinary Arts Training.

Racing Division

See transcript pages 22 – 24

11:36 a.m. **Quarterly Local Aid Payments**

The Racing Division requested the Commission's approval for local aid payment distributions to each city and town where racing activities are conducted, from a total amount of \$252,364.99.

Chad Bourque, Financial Analyst described distribution proposals for each track, and clarified to the Commission that amounts are computed at .35% times amounts wagered during the quarter ended six months prior to the payments.

11:40 a.m. *Commissioner Stebbins moved that the Commission approve the Local Aid Quarterly Payment through December 31st, 2018, as provided in the packet. Commissioner Zuniga seconded the motion. The Motion passed unanimously.*

2017 Suffolk Downs "Outs Book" Payments to Individual Patrons

The Racing Division recommended that the Commission approve the request of Sterling Suffolk Racecourse for unclaimed ticket payments from 2017 for a total of \$217.63. After review by the Racing Division, the requests have been validated by the Racing Division.

11:42 a.m. *Commissioner Zuniga moved that the Commission approve Sterling Suffolk Racecourse's request for unclaimed ticket payments from 2017 in the total amount of \$217.63. Commissioner Stebbins seconded the motion. The Motion passed unanimously.*

Finance Division

See transcript pages 24 – 32

11:43 a.m. **FY2019 Massachusetts Gaming Commission Mid-Year Budget Review**

The Finance Division is recommending that the Commission approve \$3.25M be added to the FY19 approved budget. This is due to additional costs incurring from operational and public safety costs associated with the opening of the Encore Boston Harbor site. Also, there are costs associated with migrating the Commission's technology "backbone" outside of the Commonwealth's IT support group, as well as ongoing litigation.

Commissioner Zuniga proposed that the Commission review gaming agents, GameSense, and litigation numbers in the third quarter. Director Bedrosian stated that he would publish this proposal and ask for public comment for two weeks, in order to give licensees a specific opportunity to speak with himself and CFO Derek Lennon. This proposal will then be revisited with a requested vote at the next public meeting.

Commissioner's Updates

See transcript pages 32 – 33

[12:11a.m.](#) There are no Commissioner Updates for this meeting.

Executive Session

Pursuant to M.G.L. Chapter 30A Section 21(a)(3), an Executive Session is being held for the purpose of discussing litigation strategy in the case of Stephen A. Wynn v. Karen Wells, the Massachusetts Gaming Commission, Wynn Resorts Ltd., et al.

[12:12 p.m.](#) *Commissioner Zuniga moved to go into executive session. Commissioner Stebbins seconded the motion. Roll call vote:*

Commissioner Stebbins: Aye.

Commissioner Zuniga: Aye.

Commissioner O'Brien: Aye.

Chairwoman Cameron: Aye.

Interim Chairwoman Cameron then stated that the Commission is now in executive session pursuant to the Open Meeting Law, and that all members of the public and any staff members not involved in this matter to be discussed must leave the room. Chairwoman Cameron also asked that all live audio and video recording and livestreaming be shut off and the doors to the room be closed.

List of Documents and Other Items Used

1. Notice of Meeting and Agenda, dated January 10, 2019
2. Draft Commission Meeting Minutes, dated December 20, 2018
3. Memo dated January 8, 2019 RE: Gaming Service Employee (SER) Exemptions: Encore Boston Harbor
4. PowerPoint Presentation – Encore Boston Harbor, dated January 10, 2019
5. Encore Boston Harbor Quarterly Report as of September 30, 2018
6. Memo dated January 7, 2019 RE: Local Aid Distribution
7. Memo dated January 7, 2019 RE: Sterling Suffolk Racecourse Unclaimed Ticket ("Outs") Payments for 2017
8. Memo dated January 7, 2019 RE: Review of Suffolk Downs Payments from 2017 Outs Book

9. Letter from Suffolk Downs dated January 4, 2019 RE: Commission Ruling
10. Memo dated January 10, 2019 RE: Fiscal Year 2019 (FY19) Mid-Year Budget Review
11. FY19 Actuals – Spending and Revenue Chart

/s/ Catherine Blue
Assistant Secretary

DRAFT



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this amended small business impact statement in accordance with G.L. c.30A, §5 relative to the amendments in 205 CMR 146.00: Gaming Equipment, for which a public hearing was held on January 24, 2019. These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. This regulation is largely governed by G.L. c.23K, §§2, 4(37), and 5.

The proposed amendments are in effect by emergency filing on and as of December 7, 2018. These amendments are administrative in nature, to make the language uniform with respect to the number of seats permitted at gaming tables.

205 CMR 146.00: Gaming Equipment applies directly to gaming licensees as well as equipment manufacturers and vendors. To the extent that a manufacturer or vendor is a small business, this regulation may impact small businesses.

In accordance with G.L. c.30A, §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of this regulation on small businesses would hinder achievement of the purpose of the amendments therein:

1. Establishing less stringent compliance or reporting requirements for small businesses:

There are no compliance or reporting requirements for small businesses.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

There are no schedules or deadlines for compliance or reporting requirements for small businesses created by these amendments.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

There are no compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in these amendments:



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There are no performance standards for small businesses to replace design or operational standards required in these amendments.

5. An analysis of whether the amendments are likely to deter or encourage the formation of new businesses in the Commonwealth:

G.L. c.23K was enacted to create a new industry in the Commonwealth and to promote and grow local small businesses and the tourism industry, including the development of new small businesses. This regulation is designed to effectuate those intentions and growth. However, these amendments to the regulation do not deter or encourage formation of new businesses in the Commonwealth.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

These amendments do not create any adverse impact on small businesses.

Massachusetts Gaming Commission
By:

Shara N. Bedard
Paralegal
Legal Division

Dated: _____



Massachusetts Gaming Commission

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205 CMR 146.00: GAMING EQUIPMENT

146.13: Blackjack Table; Card Reader Device; Physical Characteristics; Inspections

- (1) Blackjack shall be played at a table having ~~player positions for no more than seven players~~ on one side ~~of the table places for the players~~ and ~~on the opposite side~~ a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a blackjack table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee offering the game; and
 - (b) Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number, with the exception of the 6 to 5 blackjack variation, which shall contain no more than six betting areas.
- (3) The following inscriptions shall appear on the blackjack layout:
 - (a) Blackjack pays 3 to 2;
 - (b) Dealer must draw to 16 and stand on all 17s or Dealer must hit on soft 17s; and
 - (c) Insurance pays 2 to 1.
- (4) If a gaming licensee offers blackjack rule variations, the blackjack layout shall have imprinted on it, at a minimum, the following inscriptions instead of the inscriptions set forth in 205 CMR 146.13(3):
 - (a) Blackjack pays 1 to 1;
 - (b) Dealer must draw to 16 and stand on all 17s or Dealer must hit on soft 17s; and
 - (c) Dealer's hole card dealt face up.
- (5) Each blackjack table shall have a drop box and a tip box attached to it with the location of said boxes on the same side of the gaming table, but on opposite sides of the dealer, as previously approved by the Bureau.
- (6) If a gaming licensee offers one of the permissible additional wagers pursuant to the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the additional wager and shall have the payout odds for the additional wager imprinted on the layout or a separate sign located at the table containing the payout odds for the additional wager.
- (7) A blackjack table may have attached to it an approved card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack in accordance with the authorized Rules of the Game of Blackjack. If a blackjack table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day to insure that there has been no tampering with the device and that it is in proper

working order. A card reader device may not be used on a blackjack table offering a progressive blackjack wager pursuant to the authorized Rules of the Game of Blackjack.

(8) Notwithstanding the requirements of 205 CMR 146.13(2), if a gaming licensee offers multiple action blackjack in accordance with the authorized Rules of the Game of Blackjack, the blackjack layout shall contain, at a minimum:

- (a) Three separate designated betting areas for each player position at the table with each separate betting area being numbered one through three, provided, however, that the number of player positions at each table shall not exceed six;
- (b) A separate designated area on the layout for each player position for the placement of insurance wagers;
- (c) A separate designated area on the layout for each player position for the placement of double down wagers;
- (d) A separate designated area on the layout for each player position for the placement of split pair wagers; and
- (e) Three separate areas designated for the placement of the dealer's original face up card with each separate area being numbered one through three.

(9) In order to collect the cards at the conclusion of a round of play as required by the authorized Rules of the Game of Blackjack and at such other times as provided in 205 CMR 146.49, each blackjack table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used to play the game at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used to play the game at that table. Whenever a double shoe is used at a blackjack table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements for that table's discard rack shall be determined from the number of decks used in one side of the shoe.

(10) If a gaming licensee offers a progressive blackjack wager pursuant to the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the progressive blackjack wager and shall contain the following equipment:

- (a) A separate acceptor device for the placement of a progressive wager. Each acceptor device shall have a light which shall illuminate upon placement and acceptance of a gaming chip;
- (b) A method to ensure that only one progressive blackjack wager is made per person, per round of play;
- (c) A device or method to indicate that a progressive blackjack wager has been won;
- (d) A sign describing the winning wagers and the payouts to be awarded on winning progressive blackjack wagers at a location near the table;
- (e) A table controller panel which shall be equipped with a "lock-out" button which, once activated by the dealer, will prevent any player's gaming chip from being recognized in the acceptor device; and

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(f) A mechanical, electrical or electronic table inventory return device which shall permit all gaming chips deposited into the acceptor devices to be collected and immediately returned to a designated area within the table inventory container prior to the dealing of a hand. The table inventory return device shall be designed and constructed to contain any feature the Bureau may require to maintain the security and integrity of the game. The procedures for the operation of all functions of the table inventory return device shall be submitted to the Bureau.

(11) If a gaming licensee offers a blackjack bonus wager pursuant to the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the blackjack bonus wager, and shall contain the following equipment:

(a) A table controller located in an area of the table or the pit which area shall be secured by dual locking mechanisms, which are unique from one another. One locking mechanism shall be maintained and controlled by a gaming establishment security supervisor, and the second locking mechanism shall be maintained and controlled by a gaming establishment supervisor;

1. One table controller shall control no more than four blackjack tables. Procedures for the operation, security and control of the table controller shall be submitted to the Bureau prior to implementation;

2. Whenever it is required that a table controller or any device connected thereto which may affect the operation of the blackjack bonus system be accessed or opened, certain information shall be recorded on a form entitled "Controller Access Authorization Log," which shall include, at a minimum, the date, time, purpose of accessing or opening the controller or device, and the signature of the authorized employee accessing or opening the machine or device. The Controller Access Authorization Log shall be maintained in the same secured location as the table controller, and shall have recorded thereon a sequential number and the manufacturer's serial number or the asset number of the controller;

(b) A blackjack bonus button, which shall be located at the table by the dealer, and used by each player with a winning blackjack bonus wager to generate a bonus amount to be won by that player. The blackjack bonus button shall be attached to the table in a manner that will enable the dealer to place the blackjack bonus button directly in front of each winning player;

(c) A blackjack bonus display, which shall be located at the table and shall display the amount of the winning blackjack bonus on both sides of the device, so that the amount is visible to all players, the dealer and supervisory personnel; and

(d) A sign containing the amount of the blackjack bonus wager, as well as the minimum and maximum possible blackjack bonus amounts to be awarded, pursuant to 205 CMR 147.03.

(12) If a gaming licensee offers a streak wager pursuant to the authorized Rules of the Game of Blackjack, the blackjack table shall also contain:

(a) A layout which shall include, at a minimum:

1. Four additional separate designated betting areas for each of the player positions at the table, which areas shall be numbered "2" through "5"; and

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2. The inscriptions “Two consecutive wins pays 3 to 1,” “Three consecutive wins pays 7 to 1,” “Four consecutive wins pays 17 to 1,” and “Five consecutive wins pays 37 to 1”; and

(b) The following equipment:

1. Marker buttons (“lammers”) with the gaming licensee’s name or logo, to indicate how many consecutive blackjack hands a patron has won or another device or method approved by the Bureau; and
2. A sign containing the permissible amount of the streak wager, posted pursuant to 205 CMR 147.03.

(13) If a gaming licensee offers a match-the-dealer wager pursuant to the authorized Rules of the Game of Blackjack, the blackjack table shall contain:

- (a) A layout which shall include, at a minimum, an additional designated betting area bearing the inscription “Match-the-Dealer” at each of the player positions at the table; and
- (b) A sign approved by the Bureau setting forth the payout odds for the match-the-dealer wager.

(14) If a gaming licensee offers the 6 to 5 blackjack variation:

- (a) The layout shall have imprinted on it, at a minimum, the following inscriptions:
 1. Blackjack pays 6 to 5;
 2. Dealer must draw to 16 and soft 17 or Dealer must hit on soft 17s; and
 3. Insurance pays 2 to 1; and
- (b) A notice shall be posted in accordance with 205 CMR 147.03 indicating that all wagers shall be made in increments of \$5.00 as required by the authorized Rules of the Game of Blackjack.

(15) If a gaming licensee offers the twenty point bonus wager pursuant to the authorized Rules of the Game of Blackjack, the layout otherwise required by this section shall also include, at a minimum, an additional designated betting area for the twenty point bonus wager at each of the player positions at the table. The blackjack table shall also contain a sign setting forth the payout odds for the twenty point bonus wager.

(16) If a gaming licensee offers the option set forth in the authorized Rules of the Game of Blackjack that requires the dealer to draw additional cards on a soft 17, the blackjack layout shall have imprinted on it, at a minimum, the following inscription instead of the inscription set forth in 205 CMR 146.13(3)(b):

“Dealer must draw to 16 and soft 17 and stand on hard 17’s and all 18’s.”

(17) If a gaming licensee offers the optional bonus wager pursuant to the authorized Rules of the Game of Blackjack, the layout otherwise required by this section shall include, at a minimum, an additional designated betting area for such wager at each of the player positions at the table. In addition, payout odds for the optional bonus wager shall be inscribed on the layout or posted on a sign at each such blackjack table.

(18) If a gaming licensee requires a hand fee, the approved layout otherwise required by this section shall include, at a minimum, an additional designated area at each player position for the placement of the hand fee.

146.14: Three-card Poker Table; Physical Characteristics

(1) Three-card poker shall be played at a table having betting-player positions for ~~the no more than nine~~ players on one side of the table and a place for the dealer on the opposite side. ~~Such betting positions shall not exceed nine in number depending on the size of the table.~~

(2) A true-to-scale rendering and color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a three-card poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) A separate designated betting area at each betting-player position for the placement of "ante" wagers;
- (c) A separate designated betting area located immediately in front of each ante wager betting area for the placement of "play" wagers;
- (d) A separate designated betting area located immediately behind each ante wager betting area for the placement of "pair plus" wagers;
- (e) If the gaming licensee offers the six card bonus wager pursuant to the authorized Rules of the Game of Three Card Poker, a separate designated betting area at each betting-player position for the placement of a six card bonus wager; and
- (f) Inscriptions that advise patrons, in accordance with the authorized Rules of the Game of Three Card Poker, of the payout odds for ante and play wagers, pair plus wagers, six card bonus wagers and ante bonuses and that "Dealer Plays with Queen High or Better."

(3) Each three-card poker table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

146.15: Spanish 21 Table; Physical Characteristics

(1) Spanish 21 shall be played at a table having betting-player positions for no more than six players on one side of the table and a place for the dealer on the opposite side.

(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a Spanish 21 table shall have imprinted thereon, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) A separate designated betting area at each betting-player position for the placement of the following wagers:
 - 1. The required Spanish 21 wager; and

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2. An optional match-the-dealer wager;
 - (c) The following inscriptions:
 1. "Blackjack Pays 3 to 2";
 2. "Dealer Must Draw to 16 and Stand on All 17's";
 3. "Insurance Pays 2 to 1";
 - (d) The payout odds for each of the wagers listed in the authorized Rules of the Game of Spanish 21; and
 - (e) The payout odds for the match-the-dealer wager, unless the odds are included in the sign required by 205 CMR 146.15(3).
- (3) A gaming licensee shall post a sign at each Spanish 21 table, which explains:
- (a) That doubled down hands and split hands are not eligible for the additional payouts in the authorized Rules of the Game of Spanish 21; and
 - (b) The payout odds for the match-the-dealer wager, if those payout odds are not imprinted on the layout.
- (4) Each Spanish 21 table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (5) In order to collect the cards at the conclusion of a round of play as required by the authorized Rules of the Game of Spanish 21 and at such other times as provided in 205 CMR 146.49, each Spanish 21 table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.
- (6) A Spanish 21 table may have attached to it, as approved by the Bureau, a card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack pursuant to the definition of "blackjack" in the authorized Rules of the Game of Spanish 21. If a Spanish 21 table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

146.16: Blackjack Switch Table; Physical Characteristics

- (1) Blackjack switch shall be played at a table having ~~betting player~~ positions for no more than five players on one side of the table and a place for the dealer on the opposite side.
- (2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a blackjack switch table shall have imprinted thereon, at a minimum, the following:

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- (a) The name or trade name of the gaming licensee offering the game;
- (b) Two adjacent designated betting areas at each ~~betting-player~~ position for the placement of the required two initial blackjack switch wagers;
- (c) A separate designated area on the layout at each ~~betting-player~~ position for the placement of the optional match wager;
- (d) The following inscriptions, unless they are included on the sign required by 205 CMR 146.16(3):
 - 1. "Blackjack pays 1 to 1";
 - 2. "Insurance pays 2 to 1";
 - 3. "Dealer must hit a soft 17"; and
 - 4. "Dealer pushes on 22"; and
- (e) The payout odds for the optional match wager, unless they are included on the sign required by 205 CMR 146.16(3).

(3) A gaming licensee shall post a sign at each blackjack switch table, which shall include:

- (a) A statement that, if more than one match occurs in a player's initial four cards, the match wager will only be paid once, using the highest payoff that occurs within those cards; and
- (b) The payout odds for the optional match wager, if they are not imprinted on the layout.

(4) Each blackjack switch table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(5) Each blackjack switch table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

(6) A blackjack switch table may have attached to it a card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack. If a blackjack switch table has an approved card reader device attached to it, such device shall be inspected at the beginning of each gaming day, to insure that there has been no tampering with the device and that it is in proper working order.

146.17: Craps and Mini-craps Tables; Physical Characteristics

(1) Craps and mini-craps shall be played on an oblong table with rounded corners and high walled sides ~~having player positions for no more than eight players on each side~~. A craps table shall not be larger than 14 feet in length. A mini-craps table shall be no longer than 9 1/2 feet in length, ~~and shall have seating locations for a maximum of nine players~~.

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(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a craps or mini-craps table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) Specific areas designated for the placement of wagers as described in the authorized Rules of the Game of Craps and Mini Craps; and
- (c) The words “No call bets.”

(3) Each craps and mini-craps table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(4) In addition to the requirements of 205 CMR 146.17(2), if the fire bet in the game of craps is offered by a gaming licensee, the craps table shall include, at a minimum:

- (a) No more than 16 designated areas for the placement of fire bets, which areas shall be located around the perimeter of the layout, correspond to player positions at the table, and be sequentially numbered in a clockwise direction, with the area numbered “1” being located immediately to the left of the game personnel;
- (b) A designated area of the layout for the relocation and identification of all fire bets placed by players prior to the come out roll of a shooter, which area shall be located in front of the boxperson and contain numbered areas which correspond to the location of the numbered areas described in 205 CMR 146.17(4)(a); and
- (c) The following information on the inside wall of the table, which information shall be visible to all player positions:
 - 1. The payout odds for four, five and six different (unique) points made;
 - 2. That fire bets shall only be accepted prior to a shooter’s initial come out roll; and
 - 3. The wager limitations applicable to the fire bet.

146.18: Baccarat, Midi-baccarat Mini-baccarat, and Baccarat-Chemin de Fer Tables; Physical Characteristics

(1) Baccarat shall be played on a table having numbered ~~places for 10 to 14 seated~~player positions for no more than fourteen players.

(2) Baccarat-chemin de fer shall be played on a table having numbered ~~places for nine to 14 seated~~player positions for no more than fourteen players.

(3) Mini-baccarat shall be played at a table having ~~on one side places for a maximum of nine seated~~player positions for no more than nine players ~~on one side of the table;~~ and ~~on the opposite side~~ a place for the dealer on the opposite side; provided however, that unless the cards are changed after each shoe, a mini-baccarat table using the dealing procedure in the authorized Rules of the Game of Minibaccarat shall have ~~places for a maximum of six seated~~player positions for no more than six players. The dimensions of a mini-baccarat table shall be submitted to the Bureau.

(4) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a baccarat, midi-baccarat, mini-baccarat, or baccarat-chemin de fer table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) For baccarat, midi-baccarat and mini-baccarat layouts, specific areas designated for the placement of wagers on the "Banker's Hand," "Players Hand," and "Tie Hand;"
- (c) For baccarat-chemin de fer layouts, specific areas for the placement of the wagers authorized by the authorized Rules of the Game of Baccarat – Chemin de Fer;
- (d) For baccarat, midi-baccarat and mini-baccarat layouts, the phrase "Tie Bets pay 8 to 1;"
- (e) Numbered areas that correspond to the seat numbers for the purpose of marking vigorish; provided, however, that the numbered areas are not required if:
 1. For baccarat, the gaming licensee offers a no vigorish variation of the game in accordance with the authorized Rules of the Game of Baccarat;
 2. For mini-baccarat, the gaming licensee only charges vigorish in accordance with the provisions of the authorized Rules of the Game of Minibaccarat or offers a no vigorish variation of the game in accordance with the provisions of the authorized Rules of the Game of Minibaccarat;
- (f) An area designated for the placement of cards for the "Player's" and "Banker's" hands;
- (g) If a gaming licensee offers the optional total card wagers in the games of baccarat, midi-baccarat and mini-baccarat;
 1. Three specific areas at each player position designated for the placement of total card wagers on a total of four cards, five cards and six cards, and identified with the numerals "4," "5," and "6," respectively, which areas shall be located between the areas designated for the placement of wagers on a "Tie Hand" and the "Banker's Hand"; and
 2. An inscription on the layout indicating the payout odds for all total card wagers;
- (h) If a gaming licensee offers the optional bonus wager authorized by the authorized Rules of the Game of Baccarat or Minibaccarat:
 1. Two separate areas at each betting-player position designated for the placement of the optional bonus wager which shall be located, from the player's perspective, immediately to the right of the areas designated for the placement of wagers on the "Banker's Hand" and "Player's Hand"; and
 2. An inscription identifying the payout odds for the optional bonus wager unless the gaming licensee chooses to comply with 205 CMR 146.18(7)-(9); and
- (i) If a gaming licensee offers the no vigorish variation of baccarat, midi-baccarat or mini-baccarat pursuant to the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively:

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1. An area at each player position designated for placement of the “dragon 7” wager and inscribed with “dragon 7,” which area shall be located on the right side of the area designated for the placement of a “Tie Hand” wager when viewed by the player; and
 2. An inscription identifying the payout odds for the dragon 7 wager unless the gaming licensee chooses to comply with 205 CMR 146.18(8).
- (5) If marker buttons are used for the purpose of marking vigorish, these marker buttons shall be placed in the table inventory float container or in a separate rack designed for the purpose of storing marker buttons and such rack shall be placed in front of the table inventory float container during gaming activity.
- (6) Each baccarat and mini-baccarat table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (7) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the optional bonus wager authorized by the authorized Rules of the Game of Baccarat or Minibaccarat listing the payout odds for the optional bonus wager.
- (8) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the dragon 7 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively, indicating the payout odds for the dragon 7 wager.
- (9) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the panda 8 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively, indicating the payout odds for the panda 8 wager.

146.21: Pai Gow Poker Table; Pai Gow Poker Shaker; Physical Characteristics;
Computerized Random Number Generator

- (1) Pai gow poker shall be played at a table having ~~on one side places for the players~~ player positions for no more than six players on one side of the table and ~~on the opposite side~~ a place for the dealer on the opposite side.
- (2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a pai gow poker table shall contain, at a minimum:
 - (a) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (b) Two separate areas located below each betting area which shall be designated for the placement of the high and second highest or low hands of that player;

(c) If a gaming licensee offers the optional bonus wager and/or insurance wager authorized by the authorized Rules of the Game of Pai Gow Poker:

1. A separate area for each player, located to the right of the numbered betting areas, designated for the placement of a bonus wager by each player;
2. A separate area for each player, located to the left of the numbered betting areas, designated for the placement of an insurance wager by each player;
3. Notice of signage for payout odds for the bonus wager and insurance wager and payout amounts for the "envy bonus" as defined at the authorized Rules of the Game of Pai Gow Poker; and
4. The inscription indicating the payout limit per round of play for the bonus wager and the insurance wager established by the gaming licensee pursuant to the authorized Rules of the Game of Pai Gow Poker or a generic inscription indicating the wagers are subject to the posted payout limit;

(d) If the gaming licensee offers the additional wager authorized by the authorized Rules of the Game of Pai Gow Poker, a separate area for each player, designated for the placement of that additional wager by each player, as well as the payout odds for the additional wager;

(e) Two separate areas designated for the placement of the high and second highest or low hands of the dealer;

(f) The name or trade name of the gaming licensee offering the game;

(g) If the gaming licensee offers the optional bonus wagers authorized by the authorized Rules of the Game of Pai Gow Poker, separate areas for each player, designated for the placement of the three-card bonus wager and seven-card bonus wager; and

(h) If the gaming licensee offers the imperial pai gow bonus wager authorized by the authorized Rules of the Game of Pai Gow Poker:

1. A separate area for each player, located to the right of the area for the placement of a player's pai gow wager, designated for the placement of the imperial pai gow bonus wager; and
2. An inscription or notice of signage, as approved by the Bureau, for payout odds for both the "player hand bonus" and "banker hand bonus" as defined in the authorized Rules of the Game of Pai Gow Poker.

(3) If a gaming licensee offers the optional bonus wager and/or the insurance wager authorized by the authorized Rules of the Game of Pai Gow Poker, a sign shall be posted at each pai gow poker table offering any of these wagers that explains the following:

- (a) For the optional bonus wager and the insurance wager authorized by the authorized Rules of the Game of Pai Gow Poker, the details of the payout limit established pursuant to the authorized Rules of the Game of Pai Gow Poker and, if a generic inscription is used pursuant to 205 CMR 146.21, established payout limit; or

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- (b) For the optional wagers authorized by the authorized Rules of the Game of Pai Gow Poker, the payout odds for each bonus wager.
- (4) Each pai gow poker table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (5) Pursuant to the authorized Rules of the Game of Pai Gow Poker, pai gow poker may be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of pai gow poker is dealt in order to determine the starting position for the dealing or delivery of the cards. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
 - (a) The pai gow poker shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The pai gow poker shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (6) As an alternative to using the shaker and dice described in 205 CMR 146.21(5) a gaming licensee may, unless the gaming licensee offers the optional bonus wagers authorized by the authorized Rules of the Game of Pai Gow Poker, determine the starting position for the dealing or delivery of the cards in pai gow poker by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.
- (7) If a gaming licensee offers a progressive payout wager pursuant to 205 CMR 138.62, the pai gow poker table shall include the following features:
 - (a) A separate acceptor device mounted for the placement of the progressive wager, which acceptor device shall have a light that illuminates upon the insertion and acceptance of a gaming chip;
 - (b) A sign describing each winning progressive payout wager and the payout to be awarded therefore;
 - (c) A table controller panel located in an area of the table as approved by the Bureau and which shall be equipped with a "lock-out" button that, once activated by the dealer as set forth in 205 CMR 138.62, shall prevent any player from depositing a gaming chip in the acceptor device; and
 - (d) A mechanical, electrical or electronic table inventory return device which shall permit all gaming chips deposited into the acceptor device referenced in 205 CMR 146.13(7)(a) to be collected and immediately returned to a designated area within the table inventory container prior to the dealing of a hand. The table inventory return device shall be designed and constructed to contain any feature the may require to maintain the security and integrity of the game. The procedures for the operation of all functions of the table inventory return device shall be submitted to the Bureau.

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(8) If a gaming licensee offers the dragon's eye variation of pai gow poker pursuant to the authorized Rules of the Game of Pai Gow Poker, in addition to the requirements set forth in 205 CMR 146.21, the layout shall include six separate betting areas at each player position for the placement of the following six optional wagers:

- (a) An even wager;
- (b) An odd wager;
- (c) A match wager;
- (d) A double wager;
- (e) A triple wager; and
- (f) A dice bonus wager.

(9) If a gaming licensee offers the "dealer queen's dragon" wager, "dynasty bonus" wager, "protection" wager, and the "red/black" wager authorized by the authorized Rules of the Game of Pai Gow Poker then the following shall apply:

- (a) A separate area for each player, located above the numbered betting areas, designated "queen's dragon" for the placement of the "dealer queen's dragon" wager.
- (b) A separate area for each player, located to the right of the numbered betting areas, designated "dynasty bonus" for the placement of the "dynasty bonus" wager.
- (c) A separate area for each player, located to the left of the numbered betting areas, designated "P" for the placement of the "protection" wager.
- (d) Two separate areas for each player, one located to the right of the "queen's dragon" betting area and colored red and the other located to the left of the "queen's dragon" betting area and colored black, for the placement of the "red/black" wager.
- (e) Notice of signage, as approved by the Bureau, providing the payout odds for the "dealer queen's dragon" wager, "dynasty bonus" wager, "protection" wager, "red/black" wager, and payout amounts for the "envy bonus" as defined in the authorized Rules of the Game of Pai Gow Poker.
- (f) Inscriptions indicating the aggregate payout limit per round of play for the "dealer queen's dragon" wager, the "dynasty bonus" wager, the "protection" wager, and the "red/black" wager established by the gaming licensee pursuant to the authorized Rules of the Game of Pai Gow Poker a generic inscription indicating the wagers are subject to the posted payout limit.

146.22: Pai Gow Table; Pai Gow Shaker; Physical Characteristics

(1) Pai gow shall be played at a table having ~~on one side places for the player positions for no more than six~~ players on one side of the table and ~~on the opposite side~~ a place for the dealer on the opposite side.

(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a pai gow table shall contain, at a minimum:

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- (a) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (b) A separate area, located to the left of the dealer, for the placement of four tiles which shall be referred to as the "dead hand"; and
 - (c) The name or trade name of the gaming licensee offering the game.
- (3) Each pai gow table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (4) Pai gow shall be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of pai gow is dealt in order to determine the starting position for the dealing of the pai gow tiles. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
 - (a) The pai gow shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The pai gow shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (5) If a gaming licensee offers the dragon's eye variation of pai gow pursuant to the authorized Rules of the Game of Pai Gow, in addition to the requirements set forth in 205 CMR 146.22 the layout shall include:
 - (a) Five separate betting areas at each player position for the placement of the following five optional wagers:
 - 1. An even wager;
 - 2. An odd wager;
 - 3. A match wager;
 - 4. A double wager; and
 - 5. A triple wager; and
 - (b) A separate location to the left of dealer's table inventory container with six areas for the dealer's placement of player dice bonus wagers, which areas are designated with the numeric player position at the table.

146.23 Chase the Flush Table; Physical Characteristics

- (1) Chase the Flush shall be played on a table having player positions for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau for approval prior to utilizing the layout design.
- (2) The layout for a Chase the Flush table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Four separate designated betting areas at each player position for the placement of ante, x-tra bonus, all in and same suit wagers, configured with the same suit area closest

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to the dealer, the all in wager area farthest from the dealer, the ante wager area arrayed between the same suit wager area and the all in wager area, and the x-tra bonus wager area to the right of and separated from the ante wager area by an “+” symbol;

(c) A separate designated area for the placement of the four community cards, which area shall be located in the center of the table between the table inventory container and the player betting areas;

(d) A separate designated area for the placement of the dealer’s three cards, which area shall be located between the table inventory container and the designated area for the community cards described in 205 CMR 146.23(2)(c);

(e) An inscription indicating that an ante wager shall push if the dealer has less than a 3-card nine high flush; and

(f) Unless the gaming licensee complies with 205 CMR 146.23(3) an inscription at each player position describing the following:

1. The payout odds for same suit and x-tra bonus wagers;
2. That an x-tra wager shall not be paid unless the player’s hand beats the dealer with four or more cards of the same suit. If the player wins with less than a four card flush then the x-tra Bonus bet pushes.; and
3. The rules governing the required amount of an all in wager as a multiple of the player’s ante wager (three times the ante if made prior to the first two cards cards being exposed; two times the ante if made after the first two cards are dealt but prior to the final two community cards being dealt; or equal to the ante if made after all community cards are dealt but prior to the dealer’s cards being revealed).

(3) If the information required by 205 CMR 146.23(2)(f) is not inscribed on the layout, a sign shall be posted at each Chase the Flush table that sets forth such information.

(4) Each Chase the Flush table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of, the dealer.

146.24: Poker Table; Physical Characteristics

(1) Poker shall be played on a table which is oval in shape and ~~which has places for up to 14~~has player positions for no more than eleven players and a dealer. Each poker table shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game; and
- (b) A designated holding area located to the right of the dealer for the collection of the rake prior to final placement of the rake in the table inventory container.

(3) Each poker table shall have a designated area for the placement of at least one deck of cards. This area may be part of the table inventory container.

(4) Each poker table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer, in locations approved by the Bureau.

(5) If a gaming licensee offers a bad beat payout at a designated poker table, a transparent locked box or container shall be attached to the table on the same side as the drop box and shall be used to hold the pot contributions that fund the bad beat payout.

146.25: Double Down Stud Table; Physical Characteristics

(1) Double down stud shall be played on a table having ~~seven places~~player positions for no more than seven players on one side ~~of the table for the players,~~ and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a double down stud table contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) Seven separate designated betting areas for the placement of wagers by the players;
- (c) A separate designated area located below each betting area for the placement of double down wagers; and
- (d) A separate designated area located directly in front of the table inventory container for the placement of the dealer's common cards.

(3) The following inscription shall be conspicuously printed on each double down stud layout: "Payout Limit of \$100,000 Per Hand." A gaming licensee shall post a sign at each double down stud table explaining the details and the ramifications of this payout limit.

(4) Each double down stud table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.26: Caribbean Stud Poker Table; Physical Characteristics

(1) Caribbean stud poker shall be played on a table having ~~six or no more than~~ betting-player positions for ~~six or no more than~~ seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a Caribbean stud poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting-player position for the placement of "ante" wagers;
- (c) A separate designated betting area located immediately behind each ante betting area for the placement of "bet" wagers; and

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(d) The inscriptions "Payout Limit of \$5,000 per Hand on Bet Wagers" and "Bet Wager Void Unless Dealer has Ace/King or Better."

(3) A sign shall be posted at each Caribbean stud poker table that explains the details of the \$5,000 payout limit permitted by the authorized Rules of the Game of Caribbean Stud Poker.

(4) Each Caribbean stud poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

(5) Each Caribbean stud poker table shall also have an approved table game progressive payout wager system for the placement of progressive wagers. A table game progressive payout wager system shall include, without limitation:

- (a) A wagering device at each betting-player position that acknowledges or accepts the placement of the progressive wager;
- (b) A control device that controls or monitors the placement of progressive wagers at the gaming table, including a mechanism, such as a "lock-out" button, that prevents the recognition of any progressive wager that a player attempts to place after the dealer has announced "No more bets";
- (c) One or more devices that meet the requirements of 205 CMR for progressive wagers and payouts at table games;
- (d) Any other equipment or device that contributes to the efficient operation or integrity of the game; and
- (e) Written procedures for the operation and use of the system and its components.

146.27: Let It Ride Poker Table; Physical Characteristics

(1) Let it ride poker shall be played on a table having betting-player positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a let it ride poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) Three separate designated betting areas at each betting-player position for the placement of wagers in accordance with the authorized Rules of the Game of Let it Ride Poker;
- (c) A separate designated area at each betting-player position for the placement of the cards of each player;
- (d) A separate designated area located directly in front of the table inventory container for the placement of the community cards;
- (e) The payout odds for all authorized wagers, including the let it ride bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker and the three-card bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker, if the gaming licensee offers either optional wager;

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- (f) The inscription indicating the payout limit per hand established by the gaming licensee pursuant to the authorized Rules of the Game of Let it Ride Poker or a generic inscription indicating the game is subject to the posted payout limit; and
- (g) If a gaming licensee offers the optional three-card bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker, a separate designated area at each betting-player position for the placement of the three-card bonus wager.

(3) A sign shall be posted at each let it ride poker table that explains the details of the payout limit established pursuant to the authorized Rules of the Game of Let it Ride Poker and if a generic inscription is used pursuant to 205 CMR 146.27(2)(f), the sign shall also contain the established payout limit.

(4) Each let it ride poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

(5) If a gaming licensee offers the let it ride bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker, the let it ride poker table shall also include the following equipment or devices, which shall be submitted to and approved by the Bureau, together with the procedures for their operation and use:

- (a) A wagering device at each betting-player position that acknowledges or accepts the placement of the let it ride bonus wager;
- (b) A control device that controls or monitors the placement of let it ride bonus wagers at the gaming table, including a mechanism that prevents the recognition of any let it ride bonus wager that a player attempts to place after the dealer has announced "No more bets"; and
- (c) Any other equipment or device that contributes to the efficient operation or integrity of the game.

146.29: Fast Action Hold 'em Table; Physical Characteristics

(1) Fast action hold 'em shall be played at a table having betting-player positions for ~~the no more than nine~~ players on one side of the table and a place for the dealer on the opposite side. ~~Such betting positions shall not exceed nine in number depending on the size of the table.~~ A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for the fast action hold 'em table (the layout) shall include, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting-player position;
- (c) A separate area located immediately to the right of each betting area designated for the placement of cards to be discarded by a player pursuant to the authorized Rules of the Game of Fast Action Hold 'Em;
- (d) Five separate areas aligned in a row in the center of the layout for placement of the five community cards; and
- (e) An inscription indicating that a "natural" pays five to one.

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(3) Each fast action hold 'em table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposites sides of, the dealer.

146.30: Casino War Table; Physical Characteristics

(1) Casino war shall be played at a table having ~~betting-player~~ positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a Casino war table shall include, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each ~~betting-player~~ position for the placement of initial and war wagers;
- (c) A separate designated betting area for the placement of tie wagers; and
- (d) The payout odds for a tie wager and war wager.

(3) Each Casino war table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposites sides of, the dealer.

146.31: Colorado Hold 'em Poker Table; Physical Characteristics

(1) Colorado hold 'em poker shall be played at a table having ~~betting-player~~ positions for ~~six or no more than~~ seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for the Colorado hold 'em poker table (the layout) shall include, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each ~~betting-player~~ position for ante and bet wagers, and if a gaming licensee offers a bonus wager pursuant to the authorized Rules of the Game of Colorado Hold 'Em Poker, a separate designated betting area for the bonus wager;
- (c) A separate area located immediately to the left of each betting area designated for the placement of the card to be discarded by a player pursuant to the authorized Rules of the Game of Colorado Hold 'Em Poker or;
- (d) Three separate areas aligned in a row in the center of the layout for placement of the three community cards; and
- (e) The payout odds for all winning authorized wagers, including an "immediate winner" as defined at the authorized Rules of the Game of Colorado Hold 'Em Poker.

(3) Each Colorado hold 'em poker table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposites sides of, the dealer.

146.32: Boston 5 Stud Poker Table; Physical Characteristics

- (1) Boston 5 stud poker shall be played on a table having player positions for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Boston 5 stud poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting-player position for the placement of ante wagers;
 - (c) A separate designated area shall be located immediately to the right of each ante betting area for the placement of first wagers;
 - (d) A separate designated area shall be located immediately to the right of each first wager betting area for the placement of second wagers;
 - (e) A separate designated area shall be located immediately above each ante betting area for the placement of optional bonus wagers; and
 - (f) Notice of signage for payout odds for all authorized wagers.
- (3) A sign shall be posted at each Boston 5 stud poker table that lists the payout odds for all authorized wagers.
- (4) Each Boston 5 stud poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.33: Double Cross Poker Table; Physical Characteristics

- (1) Double cross poker shall be played on a table having player positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a double cross poker table shall contain at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting-player position for the placement of the ante wager;
 - (c) Four separate designated betting areas at each betting-player position for the placement of raise wagers, with one raise wager area located to the left of the ante betting area, one raise wager area located to the right of the ante betting area, one raise wager area located above the ante betting area and one raise wager area located below the ante betting area, so that the ante betting area and the four raise wager areas, when viewed from above, form the shape of a cross;
 - (d) A separate designated area at each betting-player position for the placement of a three-card wager, located to the right of the designated areas for the placement of ante and raise wagers;
 - (e) A separate designated area, located between the table inventory container and

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the player betting areas on the right hand side of the dealer, for the placement of the five community cards in the same type of cross formation created by the five wager areas described in 205 CMR 146.33(2)(b)-(c);

(f) A separate designated area, located between the table inventory container and the player betting areas on the left hand side of the dealer, for the placement of the dealer's two cards; and

(g) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds for all authorized wagers posted at each double cross poker table.

(4) Each double cross poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.34: Double Attack Blackjack Table; Physical Characteristics

(1) Double attack blackjack shall be played on a table having player positions for ~~six~~ no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a double attack blackjack table shall contain, at a minimum:

(a) The name or trade name of the gaming licensee; and

(b) Separate designated betting areas at each betting-player position for the placement of the initial wager, the double attack wager, and the optional bonus wager.

(3) The following inscriptions shall appear on the double attack blackjack layout:

(a) Blackjack pays 1 to 1;

(b) Dealer must draw to 16, and stand on all 17's; and

(c) Insurance pays 5 to 2.

(4) Payout odds for the optional bonus wager authorized by the authorized Rules of the Game of Double Attack Blackjack shall be inscribed on the layout or posted on a sign at each double attack blackjack table.

(5) Each double attack blackjack table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.35: Four-Card Poker Table; Physical Characteristics

(1) Four-card poker shall be played on a table having player positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a four-card poker table shall contain, at a minimum:

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- (a) The name or trade name of the gaming licensee;
- (b) Separate designated betting areas at each betting-player position for the placement of the ante wager and the play wager;
- (c) Separate designated betting areas at each betting-player position for the placement of the aces up wager; and
- (d) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds for all authorized wagers posted at each four-card poker table.

(4) Each four-card poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.36: Texas Hold 'em Bonus Poker Table; Physical Characteristics

- (1) Texas hold 'em bonus poker shall be played on a table having player positions for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Texas hold 'em bonus poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each player position for the placement of ante wagers;
 - (c) Three separate designated areas at each player position for the placement of flop, turn and river wagers, which areas shall be located immediately above the ante betting area as viewed by a player;
 - (d) A separate designated area at each player position for the placement of an optional bonus wager, which area shall be located immediately above and to the right of the flop wager betting area as viewed by a player;
 - (e) A separate designated area for the placement of the five community cards, which area shall be located in the center of the table between the table inventory container and the player betting areas;
 - (f) A separate designated area for the placement of the dealer's two cards, which area shall be located between the table inventory container and the designated area for the community cards described in 205 CMR 146.36(2)(e); and
 - (g) An inscription indicating that an ante wager shall receive a payout if a winning hand has a qualifying rank, as elected by the gaming licensee, of straight or higher or flush or higher.
- (3) A sign that lists the payout odds for all authorized wagers shall be posted at each Texas hold 'em bonus poker table.
- (4) Each Texas hold 'em bonus poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.37: Flop Poker Table; Physical Characteristics

- (1) Flop poker shall be played on a table having player positions for no more than nine players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a flop poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Three separate designated betting areas at each player position for the placement of ante, pot and flop wagers, with the pot wager area closer to the dealer than the ante and flop wager areas;
 - (c) An arc extending across all player positions with the areas designated for players' pot wagers on the side of the arc closer to the dealer and with the areas designated for players' ante and flop wagers on the side of the arc farther from the dealer;
 - (d) A designated area at each player position for the placement of player cards located between the designated areas for the placement of the ante wager and the flop wager;
 - (e) A designated area at the center of the gaming table for the placement of the three community cards;
 - (f) A designated area at the center of the gaming table for the placement of collected pot wagers, which area shall be located farther from the dealer than the designated area described in 205 CMR 146.37(2)(b); and
 - (g) Unless the gaming licensee complies with 205 CMR 146.37(3), an inscription listing the payout odds for ante and flop wagers and indicating that the highest ranking hand wins all pot wagers.
- (3) If the information required by 205 CMR 146.37(2)(g) is not inscribed on the layout, a sign shall be posted at each flop poker table that lists the payout odds for ante and flop wagers and indicating that the highest ranking hand wins all pot wagers.
- (4) Each flop poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of, the dealer.
- (5) In addition to the requirements of 205 CMR 146.37(2), if a gaming licensee offers the three-card bonus wager, the flop poker table shall include a designated betting area at each player position for the placement of the three-card bonus wager. The flop poker table shall also contain a sign setting forth the payout odds for the three-card bonus wager.

146.38: Two-Card Joker Poker Table; Physical Characteristics

- (1) Two-card joker poker shall be played on a table having player positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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- (2) The layout for a two-card joker poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Four separate designated betting areas at each player position for the placement of the ante wager, call wager, pair up wager and super flush bonus wager;
 - (c) An inscription identifying the payout odds for all authorized wagers unless the gaming licensee chooses to comply with 205 CMR 146.38(3); and
 - (d) An inscription indicating that a joker may only be used to complete a pair unless the gaming licensee chooses to comply with 205 CMR 146.38(4).
- (3) If the payout odds are not inscribed on the layout as provided in 205 CMR 146.38(2)(c) a sign identifying the payout odds for all authorized wagers shall be posted at each two-card joker poker table.
- (4) If the layout is not inscribed with the information described in 205 CMR 146.38(2)(d) a sign shall be posted at each two-card joker poker table indicating that a joker may only be used to complete a pair.
- (5) Each two-card joker poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.39: Asia Poker Table; Asia Poker Shaker; Physical Characteristics; Computerized Random Number Generator

- (1) Asia poker shall be played at a table having ~~places-player positions for~~ for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for an Asia poker table shall contain, at a minimum, the following:
 - (a) The name or trade name of the gaming licensee;
 - (b) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (c) Three separate areas located below each betting area, which shall be designated for the placement of the high, medium and low hands of that player and configured with the high hand area farthest from the betting area, the low hand area closest to the betting area, and the medium hand area arrayed between the high hand area and the low hand area; and
 - (d) Three separate areas located in front of the table inventory container designated for the placement of the high, medium and low hands of the dealer and configured with the dealer's high hand area closest to the dealer, the dealer's low hand area farthest from the dealer, and the dealer's medium hand area arrayed between the dealer's high hand area and the dealer's low hand area.

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- (3) Each Asia poker table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of the dealer.
- (4) Pursuant to the authorized Rules of the Game of Asia Poker, Asia poker may be played with a container, to be known as an “Asia poker shaker,” which shall be used to shake three dice before each hand of Asia poker is dealt in order to determine the starting position for the dealing or delivery of the cards. The Asia poker shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
- (a) The Asia poker shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The Asia poker shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (5) As an alternative to using the shaker and dice described 205 CMR 146.39(4), a gaming licensee may determine the starting position for the dealing or delivery of the cards in Asia poker by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

146.40: Ultimate Texas Hold ‘em Table; Physical Characteristics

- (1) Ultimate Texas hold ‘em shall be played on a table having player positions for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for an ultimate Texas hold ‘em table shall contain, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) Four separate designated betting areas at each player position for the placement of ante, blind, play and trips wagers, configured with the trips wager area closest to the dealer, the play wager area farthest from the dealer, the ante wager area arrayed between the trips wager area and the play wager area, and the blind wager area to the right of and separated from the ante wager area by an “=” symbol;
 - (c) A separate designated area for the placement of the five community cards, which area shall be located in the center of the table between the table inventory container and the player betting areas;
 - (d) A separate designated area for the placement of the dealer’s two cards, which area shall be located between the table inventory container and the designated area for the community cards described in 205 CMR 146.40(2)(c);
 - (e) An inscription indicating that an ante wager shall push if the dealer has less than a pair; and

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(f) Unless the gaming licensee complies 205 CMR 146.40(3) an inscription at each player position describing the following:

1. The payout odds for blind and trips wagers;
2. That a blind wager shall not be paid unless the player's hand ranks higher than the dealer's hand; and
3. The rules governing the required amount of a play wager as a multiple of the player's ante wager (three or four times the ante if made prior to any community cards being dealt; two times the ante if made after the flop is dealt but prior to the final two community cards being dealt; or equal to the ante if made after all community cards are dealt but prior to the dealer's cards being revealed).

(3) If the information required by 205 CMR 146.40(2)(f) is not inscribed on the layout, a sign shall be posted at each ultimate Texas hold 'em table that sets forth such information.

(4) Each ultimate Texas hold 'em table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.41: Winner's Pot Poker Table; Physical Characteristics

(1) Winner's pot poker shall be played on a table having player positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a winner's pot poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) Four separate designated betting areas at each player position for the placement of ante, bet, double and jacks plus bonus wagers, configured in an array so that the jacks plus bonus wager area is closest to the dealer, the double wager area is second closest to the dealer, the bet wager area is third closest to the dealer, and the ante wager area is farthest from the dealer;
- (c) Three separate designated betting areas for the placement of the ante, bet and double wagers of the dealer, configured in an array in front of the dealer so that the double wager area is closest to the dealer, the bet wager area is the second closest to the dealer, and the ante wager area is farthest from the dealer;
- (d) A designated area at each player position for the placement of the face up cards of the player, which area shall be located to the left of and adjacent to the wagering areas of the player;
- (e) A designated area at the center of the gaming table for the placement of the face up cards of the dealer;
- (f) A designated area at the center of the gaming table for the placement of the collected wagers comprising the winner's pot; and
- (g) Unless the gaming licensee complies with 205 CMR 146.41(3), inscriptions:
 1. Listing the payout odds for the jacks plus bonus wager; and

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2. Indicating that the winner's pot shall be awarded to the highest ranking hand of a player or the dealer.
- (3) If the information required by 205 CMR 146.41(2)(g) is not inscribed on the layout, a sign shall be posted at each winner's pot poker table that lists the payout odds for the jacks plus bonus wager and indicates that the winner's pot shall be awarded to the highest ranking hand of a player or the dealer. In addition, a sign shall be posted at each winner's pot poker table indicating that:
 - (a) The ante wager of a player who folds after the first three cards are dealt does not increment the winner's pot and is placed in the table inventory container;
 - (b) The percentage or, if applicable, the dollar amount of the commission that shall be deducted from the winner's pot and placed in the table inventory container; and
 - (c) The outcome of a jacks plus bonus wager of a player who has folded his or her hand shall be determined on the cards dealt to the player prior to folding.
- (4) Each winner's pot poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.42: Supreme Pai Gow Table; Pai Gow Poker Shaker; Physical Characteristics;
Computerized Random Number Generator

- (1) Supreme pai gow shall be played at a table having ~~places-player positions~~ for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a supreme pai gow table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Six separate designated betting areas for the players at the table for placement of the supreme pai gow wager with each area being numbered one through six;
 - (c) Two separate areas located below each betting area which shall be designated for the placement of the high and low hands of that player and configured with the high hand area farther from the betting area;
 - (d) Two separate areas located in front of the table inventory container designated for the placement of the high and low hands of the dealer and configured with the dealer's high hand closer to the dealer; and
 - (e) A separate designated area at each player position for placement of the bonus wager, which area shall be located immediately above and to the right of the supreme pai gow wagering area as viewed by the player.
- (3) Each supreme pai gow table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (4) Pursuant to the authorized Rules of the Game of Supreme Pai Gow, supreme pai gow may be played with a container, to be known as a "pai gow shaker," which shall be used

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to shake three dice before each hand of supreme pai gow is dealt in order to determine the starting position for the dealing or delivery of the cards. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

- (a) The pai gow shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
- (b) The pai gow shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.

(5) As an alternative to using the shaker and dice described in 205 CMR 146.42(4), a gaming licensee may determine the starting position for the dealing or delivery of the cards in supreme pai gow by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

146.43: Mississippi Stud; Physical Characteristics

(1) Mississippi stud shall be played on a table having ~~betting-player~~ positions for ~~no more than~~ six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a Mississippi stud table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each ~~betting-player~~ position for the placement of the ante wager;
- (c) Three separate designated betting areas at each ~~betting-player~~ position for the placement of the 3rd street, 4th street and 5th street wagers, which areas shall be located closer to the player than the ante wager betting area and, when viewed by the player, arrayed from left to right;
- (d) Inscriptions at each ~~betting-player~~ position providing that:
 - 1. All bet wagers shall be in an amount equal to one, two or three times the amount of the player's ante; and
 - 2. The payout odds for all authorized wagers; and
 - 3. Three separate designated areas in front of the dealer for the placement of the community cards, with one area inscribed "3rd street," a second area inscribed "4th street," and a third area inscribed "5th street."

(3) Each Mississippi stud table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of, the dealer.

146.44: Red Dog Table; Physical Characteristics

(1) Red dog shall be played at a table having ~~on one side~~ ~~places~~ player positions for no

more than seven players on one side of the table and on the opposite side a place for the dealer. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

- (2) The layout for a red dog table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee offering the game;
 - (b) Two separate designated betting areas for each player, clearly marked to distinguish between the original wager and the raise wager, and situated so that the betting area for the raise wager is closer to the player than the betting area for the original wager;
 - (c) An area designated for the placement of the first, second and third card; and
 - (d) The payout odds currently being offered in accordance with the authorized Rules of the Game of Red Dog.
- (3) Each red dog table shall have a drop box and a tip box attached to it with the location of said boxes on the same side of the gaming table but on opposite sides of the dealer.

146.58: Crazy 4 Poker Table; Physical Characteristics

- (1) Crazy 4 poker shall be played on a table having player positions for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Crazy 4 poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Separate designated betting areas at each betting-player position for the placement of the Ante, Play, Super Bonus and Queens Up Wagers for each player. The Super Bonus betting area must be located to the right of the Ante Wager betting area and be separated by an “=” symbol;
 - (c) If the licensee offers either the Four or Five-Card Progressive Payout Wager pursuant to the Authorized Rules of the Game of Crazy 4 Poker, a separate area designated for the placement of the Progressive Payout Wager for each player;
 - (d) If a licensee offers the Five Card Hand Bonus Wager pursuant to the Authorized Rules of the Game of Crazy 4 Poker, each betting-player position must contain an electronic wagering system for the placement of the Five Card Hand Bonus Wager;
 - (e) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds or amounts for all permissible wagers posted at each Crazy 4 Poker table;
 - (f) Inscriptions that advise patrons of the following:
 - (i) The best four-card hand plays.
 - (ii) The dealer qualifies with a king or better.
 - (iii) A player who has a pair of aces or better may place a Play Wager in an amount up to three times the player's Ante Wager.

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(iv) The player's Super Bonus Wager shall be returned if the player beats or ties the dealer with a hand that is not a straight or better.

(4) Each Crazy 4 poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

(5) If the gaming licensee offers either a Four or Five-Card Progressive Payout Wager pursuant to the Authorized Rules of the Game of Crazy 4 Poker, the Crazy 4 Poker table must have a progressive table game system, in accordance with 205 CMR 143.02 for the placement of Progressive Payout Wagers. If the gaming licensee is offering a Progressive Payout Wager on multiple linked tables or games in the same gaming establishment, the progressive table game system must comply with 205 CMR 143.02. The progressive table game system must include:

- (a) A wagering device at each ~~betting-player~~ position that acknowledges or accepts the placement of the Progressive Payout Wager; and
- (b) A device that controls or monitors the placement of Progressive Payout Wagers at the gaming table, including a mechanism, such as a lock-out button, that prevents the recognition of any Progressive Payout Wager that a player attempts to place after the dealer has announced "no more bets."

(6) If the gaming licensee offers the Five Card Hand Bonus Wager pursuant to the Authorized Rules of the Game of Crazy 4 Poker, the Crazy 4 Poker table must have a table game system, in accordance with 205 CMR 138.62 and an electronic wagering system in accordance 205 CMR 146.63. Each ~~betting-player~~ position must contain an electronic wagering system for the placement of the Five Card Hand Bonus Wager. The system must include a mechanism, such as a lockout button, that prevents the placement of any Five Card Hand Bonus Wagers that a player attempts to place after the dealer has begun dealing the cards. If the certificate holder is offering a Five Card Hand Bonus Wager on multiple linked tables or games in the same gaming establishment, the progressive table game must comply with 205 CMR 143.02.

146.59: Criss-Cross Poker table physical characteristics.

- (1) Criss-Cross Poker shall be played at a table having ~~betting-player~~ positions for no more than six players on one side of the table and a place for the dealer on the opposite side ~~of the table~~. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Criss-Cross Poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee.
 - (b) Five separate betting areas for each player designated for the placement of the Ante Across and Ante Down Wagers and the Across, Down and Middle Bets.
 - (c) Five separate areas designated for the placement of the five community cards. The area for the community cards must form a cross with one box furthest from the table inventory container, three boxes in the center row and one box directly in front of the table inventory container.

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- (d) If the licensee offers the optional Five Card Bonus Wager, a separate area designated for the placement of the Five Card Bonus Wager for each player.
 - (e) Inscriptions that advise patrons of the payout odds or amounts for all permissible wagers offered by the licensee. If payout odds or amounts are not inscribed on the layout, a sign identifying the payout odds or amounts for all permissible wagers shall be posted at each Criss-Cross Poker table.
 - (f) If the licensee establishes a payout limit per player per round, inscriptions that advise patrons of the payout limit. If the limit is not inscribed on the layout, a sign identifying the payout limit shall be posted at each Criss-Cross Poker table.
 - (g) Each Criss-Cross Poker table must have a drop box and a tip box attached on the same side of the table as, but on opposite sides of, the dealer as approved by the on-site Bureau office. The Bureau may approve an alternative location for the tip box when a card shuffling device or other table game equipment prevents the placement of the drop box and tip box on the same side of the gaming table as, but on opposite sides of, the dealer.
- (3) Each Criss-Cross Poker table must have a discard rack securely attached to the top of the dealer's side of the table.

146.60: Free Bet Blackjack

(1) Free Bet Blackjack shall be played at a table having ~~betting-player~~ positions for no more than six players on one side of the table and a place for the dealer on the opposite side ~~of the table~~.

(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a Free Bet Blackjack table shall contain, at a minimum:

- (a) The name or logo of the gaming licensee;
- (b) A separate betting area designated for the placement of the Blackjack Wager for each player;
- (c) The following inscriptions:
 - (i) Blackjack pays 3 to 2;
 - (ii) Insurance pays 2 to 1;
 - (iii) Dealer shall draw to 16 and stand on all 17s or other similar language approved by the Bureau;
 - (iv) Blackjack Wagers will push if the dealer's hand has a total point count of 22 or other similar language approved by the Bureau; and
 - (v) Surrender is not available on a Free Bet Blackjack table or other similar language approved by the Bureau, unless the gaming licensee posts a sign at each Free Bet Blackjack table specifying that surrender is not available.
- (d) If the licensee offers the Push 22 Wager, a separate area designated for the placement of the wager for each player;

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(e) Inscriptions that advise patrons of the payout odds or amounts for all permissible wagers offered by the certificate holder unless a sign identifying the payout odds or amounts for all permissible wagers is posted at each Free Bet Blackjack table.

(3) Each Free Bet Blackjack table must have a drop box and a tip box attached on the same side of the table as, but on opposite sides of, the dealer.

(4) Each Free Bet Blackjack table must have a card reader device attached to the top of the dealer's side of the table. The floorperson assigned to the Free Bet Blackjack table shall inspect the card reader device at the beginning of each gaming day to ensure that there has been no tampering with the device and that it is in proper working order.

(5) Each Free Bet Blackjack table must have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack must either:

- (a) Equal the height of the cards, stacked one on top of the other, in the total number of decks that are to be used in the dealing shoe at that table; or
- (b) Be taller than the height of the total number of decks being used if the discard rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards in the number of decks to be used in the dealing shoe at that table.

146.61: Heads Up Hold 'Em

(1) Heads Up Hold 'em shall be played at a table having betting-player positions for no more than six players on one side of the table and a place for the dealer on the opposite side.

(2) A true-to-scale rendering and color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a Heads Up Hold 'em table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting-player position for the placement of the ante wager;
- (c) A separate designated betting area located immediately behind each ante wager betting area for the placement of the raise wager;
- (d) The odds wager, trips plus wager and pocket bonus wager permitted pursuant to the Authorized Rules of the Game of Heads Up Hold 'em, shall be placed in a separate designated betting area at each betting-player position for the placement of each wager as follows:
 - (i) The odds wager designated betting area shall be to the right of and aligned with the ante wager;
 - (ii) The trips plus wager designated betting area shall be in front of the ante wager;
 - (iii) The pocket bonus wager designated betting area shall be to the right of and aligned with the trips plus designated betting area, and in front of the odds wager designated betting area;

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(d) Heads Up Hold 'em tables shall have inscriptions that advise patrons of the payout odds of the odds wager, bad beat bonus, trips plus wager, and pocket bonus wager as described in the Authorized Rules of the Game of Heads Up Hold 'em, respectively; and inscriptions that advise patrons of the permissible raise wagers.

(3) Each Heads Up Hold 'em table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

146.62: High Card Flush; physical characteristics

(1) High Card Flush shall be played at a table having betting-player positions for no more than six players on one side of the table and a place for the dealer on the opposite side.

(2) A true-to-scale rendering and color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a High Card Flush table shall contain, at a minimum:

- a) The name or trade name of the gaming licensee;
- b) A separate designated betting area at each betting-player position for the placement of the ante wager;
- c) A separate designated betting area located immediately in front of each ante wager betting area for the placement of the raise wager;
- d) If a gaming licensee offers the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager pursuant to the Authorized Rules of the Game of High Card Flush, a separate designated betting area at each betting-player position for the placement of each wager, which shall be located behind each ante wager betting area;
- e) If a gaming licensee offers the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager pursuant to the Authorized Rules of the Game of High Card Flush, inscriptions that advise patrons of the payout odds for the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager, as described in the Authorized Rules of the Game of High Card Flush.
- f) Inscriptions that advise patrons of the permissible raise wagers, as described in the Authorized Rules of the Game of High Card Flush; and;
- g) Inscriptions that advise patrons of the dealer's qualifying hand, as defined in the Authorized Rules of the Game of High Card Flush.

(3) Each High Card Flush table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(4) If a gaming licensee offers the Progressive payout wager pursuant to the Authorized Rules of the Game of High Card Flush, each High Card Flush table shall be equipped with an approved table game progressive payout wager system for the placement of Progressive payout wagers, equipped with additional approved features or standards including, but not limited to, those required pursuant to 205 CMR 143.02.



Division of Racing

TO: Gayle Cameron, Interim Chairwoman
Eileen O'Brien, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner

FROM: Alexandra Lightbown, Director of Racing

CC: Edward Bedrosian, Executive Director
Catherine Blue, General Counsel

DATE: January 18, 2019

RE: Recovery of 2017 Unclaimed Winnings from
Sterling Suffolk Racecourse

Dear Commissioners:

In accordance with Massachusetts General Law Chapter 128A Section 5, Senior Financial Analyst Chad Bourque has reviewed the unclaimed winnings from calendar year 2017 at Sterling Suffolk Racecourse and determined that \$236,084.68 (\$236,302.31 total outs-\$217.63 approved ticket payments) is payable to the Commonwealth of Massachusetts.

Recommendation: That the Commission approve the payment of \$236,084.68 from Sterling Suffolk Racecourse to the Commonwealth of Massachusetts for 2017 unclaimed winnings ("Outs").



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Division of Racing

TO: Gayle Cameron, Interim Chairwoman
Eileen O'Brien, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner

FROM: Alexandra Lightbown, Director of Racing

CC: Edward Bedrosian, Executive Director
Catherine Blue, General Counsel

DATE: January 18, 2019

RE: Recovery of 2017 Unclaimed Winnings from
Wonderland Greyhound Park

Dear Commissioners:

In accordance with Massachusetts General Law Chapter 128A Section 5, Senior Financial Analyst Chad Bourque has reviewed the unclaimed winnings from calendar year 2017 for Wonderland Greyhound Park and determined that \$7,981.23 is payable to the Commonwealth of Massachusetts.

Recommendation: That the Commission approve the payment of \$7,981.23 from Wonderland Greyhound Park to the Commonwealth of Massachusetts for 2017 unclaimed winnings ("Outs").



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Division of Racing

TO: Gayle Cameron, Interim Chairwoman
Eileen O'Brien, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner

FROM: Alexandra Lightbown, Director of Racing

CC: Edward Bedrosian, Executive Director
Catherine Blue, General Counsel

DATE: January 18, 2019

RE: Recovery of 2017 Unclaimed Winnings from
Plainridge Racecourse

Dear Commissioners:

In accordance with Massachusetts General Law Chapter 128A Section 5, Senior Financial Analyst Chad Bourque has reviewed the unclaimed winnings from calendar year 2017 at Plainridge Racecourse and determined that \$186,705.64 is payable to the Commonwealth of Massachusetts.

Recommendation: That the Commission approve the payment of \$186,705.64 from Plainridge Racecourse to the Commonwealth of Massachusetts for 2017 unclaimed winnings ("Outs").



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Division of Racing

TO: Gayle Cameron, Interim Chairwoman
Eileen O'Brien, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner

FROM: Alexandra Lightbown, Director of Racing

CC: Edward Bedrosian, Executive Director
Catherine Blue, General Counsel

DATE: January 18, 2019

RE: Recovery of 2017 Unclaimed Winnings from
Raynham/Taunton/Massasoit Greyhound
Associations

Dear Commissioners:

In accordance with Massachusetts General Law Chapter 128A Section 5, Senior Financial Analyst Chad Bourque has reviewed the unclaimed winnings from calendar year 2017 at Raynham/Taunton/Massasoit Greyhound Associations and determined that \$150,144.70 is payable to the Commonwealth of Massachusetts.

Recommendation: That the Commission approve the payment of \$150,144.70 from Raynham/Taunton/Massasoit Greyhound Associations to the Commonwealth of Massachusetts for 2017 unclaimed winnings ("Outs").



Massachusetts Gaming Commission



MASSACHUSETTS GAMING COMMISSION

MEMORANDUM

To: Interim Chairwoman Cameron and Commissioners O'Brien, Stebbins, and Zuniga
From: Edward Bedrosian, Jr., Executive Director and Derek Lennon, CFAO
Date: 1/24/2019
Re: Fiscal Year 2019 (FY19) Mid-Year Budget Review

Summary:

The Massachusetts Gaming Commission approved a FY19 budget for the Gaming Control Fund of \$33.4M composed of \$22.6M in regulatory costs and \$10.79M in statutorily required costs. The Gaming Control Fund required an initial assessment of \$28.32M on licensees. FY18 revenue exceeded FY18 expenses by \$947.3K, which resulted in the initial FY19 assessment being reduced from \$28.32M to \$27.37M.

The FY19 approved budget does not include operational or public safety costs associated with the opening of the Everett casino site. Additionally, the FY19 approved budget does not include the costs associated with migrating our technology backbone outside of the Commonwealth's information technology support group, or the additional costs of on-going litigation. Staff is recommending that \$3.1M in additional costs be added to the FY19 approved budget.

The above mentioned increase in costs would result in a revised budget of \$36.5M for the Gaming Control Fund. The increased costs are partially offset by \$860.9K in revenue that has exceeded the initial FY19 projections. The combined effect of budget increases and additional revenue would result in an increase to licensees' assessments of \$2.24M. The table below summarizes the impact of the additional costs and excess revenues:

Category	Description	Amount
Opening of Everett Casino		
	Public Safety Everett	\$807,876.57
	Gaming Agents Everett	\$229,709.50
	IT Everett	\$134,386.00
Subtotal Opening of Everett Casino		\$1,171,972.07
Other MidYear Needs		
	Public Safety MGM Springfield	\$396,341.78
	Litigation	\$750,000.00
	IT Migration	\$791,429.03
Subtotal Other Mid Year Needs		\$1,937,770.81
Total Mid Year Request		\$3,109,742.88
Less Revenue in Excess of Projections		\$860,945.25
Increase to Licensee Assessment		\$2,248,797.63



Massachusetts Gaming Commission

Everett Casino Operational and Public Safety Cost Details:

When the Commission approved the FY19 initial budget it was with the knowledge that MGC operational and public safety costs associated with the start-up of the Everett casino site were not included. Staff explained in the June 2018 public meetings the reason for not including the start-up costs was due to the uncertain time table for the opening of the casino. At this point, while the time table is still uncertain, if the Commission fails to authorize funding for the operational and public safety costs requested to open a casino, the Commission's staff will not be able to make the end of June time table currently projected.

The additional costs total \$1.31M and are composed of new full-time positions and fringe benefits (8 FTEs, \$229.7K), funding of the Gaming Enforcement Unit (\$807.8K), and information technology circuits, equipment, and testing of Gaming Equipment at MGC offices in the Everett facility (\$134.8K). The following chart lists the costs by spending category and below the chart is a description of the costs as it relates to each division:

Object Class	Description	Amount
AA	Full-time Equivalent Salaries	167,500.00
DD	Fringe and Payroll Taxes	62,209.50
HH	GameSense	144,418.00
UU	Gaming Technology	134,386.00
Total Everett Operational and Public Safety Costs		1,171,972.07

Office of Information Technology \$134.3K:

- Slot Machine Testing \$75K: Testing of progressive metering devices and casino management system by independent test laboratory.
- Hardware and Data Lines \$59.3K: Data lines and equipment for MGC's central monitoring system, and IT equipment for staff at Everett Casino.

Investigations and Enforcement Bureau \$1.03M:

- Gaming Agents Division \$229.7K: Eight (8) FTEs composed of a senior supervising agent and seven (7) supervisors/agents. All these positions would be budgeted for the last three months of FY19
- Gaming Enforcement Unit \$807.8K: 19 members composed of both Everett and MSP Lieutenant, Sergeants, and Troopers/Officers. All of these positions would be budgeted for the last four months of FY19.

Other Mid-Year Needs:

In addition to the operational and public safety costs for the Everett Casino site, staff is requesting consideration for funding for litigation (\$750K, this covers current legal costs), additional public safety funding for MGM Springfield (\$396.3K), and migration of the MGC IT backbone from the Executive Office of Technology and Security (EOTSS) to a cloud based solution (\$791.4K). The following chart lists the costs by spending category and below the chart is a description of the costs as it relates to each division:



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Object Class	Description	Amount
HH	Outside Counsel Litigation	750,000.00
JJ	Public Safety Costs	396,341.78
UU	IT Migration to Cloud	791,429.03
Total Other Mid-Year Costs:		1,937,770.81

Office of General Counsel \$750K:

- Litigation for Boston based services \$500K.
- Litigation for Nevada based services \$250K.

Investigations and Enforcement Bureau \$396.3K:

- Five months funding for three (3) additional staff (2 MSP and 1 Springfield) for the Springfield Gaming Enforcement unit (\$146.3K). Post opening of the casino, the Springfield GEU has had to adjust security levels based on operational needs. This funding will help to reduce overtime costs as well as staff burnout.
- Replenish of overtime budget for GEU at MGM, Plainville and Central Office \$250K.

Office of Information and Technology \$791.4K:

- Switches, circuits, servers and equipment for a new network and cloud environment (\$184.2K)
- Migration from EOTSS to independent cloud with active back-up and creation of our own domain (\$527.2K)
- Migration of applications (JIRA, Intranet, LMS, Itrak, etc) to cloud format (\$80K)

The litigation request funds current litigation costs. Costs for the remainder of the year can range anywhere from an additional \$500K to \$1M. Staff will wait until the end of the third quarter to come back to the Commission on an estimate to finish the year. The litigation outlook should be clearer at that time.

The additional \$250K of overtime proposed in this document will take a great deal of management and prioritizing to last the next six months. However, staff is hopeful that with the addition of three staff at MGM Springfield to help manage high volume times this amount will be sufficient to close out the fiscal year.

The Migration from EOTSS supported services to the cloud environment has been one the Commission has been contemplating for a couple of years. With the opening of an Everett location, as well as a refresh cycle coming up for our IT equipment (which is close to 5 years old and either at the end or past the end of its useful life cycle) now is the time to migrate to avoid duplicative costs.

Mid-Year Revenue Update:

The FY19 Budget for the Gaming Control Fund relies on fees from licensing and slots of ~\$5.08M, and an assessment of \$28.32M to fund the spending needs. Revised licensing estimates have licensing fees exceeding initial projections by \$185.1K. The commission has received a reimbursement of \$57K in attorney's fees from our insurance company as well as another \$4K in miscellaneous revenue sources that were not anticipated in FY19. The Commission also billed for and received \$614.8K in direct costs associated with the Wynn suitability investigation that represents costs from the inception of the investigation through September of 2018. This is a total of \$860.9K in additional revenue that was not



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included in the initial FY19 budget documents. This revenue will offset the requested \$3.1M in additional spending, thus reducing any additional assessment on licensees to \$2.24M

Assessment on Licensees:

205 CMR 121.00 describes how the Commission shall assess its operational costs on casino licensees including any increases or decreases that are the result of over or under spending. CMR 121.04(3) states “If at any time during the fiscal year the commission determines that actual costs will exceed the projected costs and projected revenue in the budget the Commission will revise the Annual Assessment assessed to each gaming establishment and invoice each gaming establishment for its proportional share of such costs.”

205 CMR 121.01 (3) states “The following fees are due and payable to the commission:

(b) An annual assessment, (Annual Assessment) as provided by M.G.L. c.23K § 56(c), to be determined by the commission and calculated in accordance with M.G.L. c.23K § 56(c) to cover costs of the commission necessary to maintain control over gaming establishments, in proportion to the number of gaming positions approved by the commission at the gaming establishment; provided, however, that such assessment may be adjusted by the commission at any time after payment is made where required to reflect the actual number of positions at a gaming establishment...”

The MGM Springfield was initially responsible for paying ~39% (see table below titled “Initial FY19 Gaming Positions Calculation”) of the assessment based on the gaming positions in their approved application (3,600). Currently the casino has 2,435 EGDs, 91 Table Games and 23 Poker Tables. By calculating gaming positions based on the table below, the total number of gaming positions in January for MGM drops to 3,276, and would also result in their proportional share of the assessment dropping to 36.77% (see table below titled “Revised FY19 Gaming Positions Calculations”). While the CMR does allow the commission to adjust the assessment at “any time” staff is suggesting that the commission only adjust one time per year (at the mid-year budget review), and adjust the assessment from January 1st forward and not go retro-active.

Prior to the opening of a category 1 casino, the commission estimated table gaming positions as 6 seats/positions per table. Now that a facility is open, staff is recommending that the following table be used to estimate gaming positions per table game:

Type of Game	Positions
Slot machine	1 position for each seat/ slot
Craps	14 positions for each table
Poker	10 positions for each table
Big 6	8 positions for each table
Roulette	7 positions for each table
All other table games	6 positions for each table



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Initial (June 2018) FY19 Gaming Positions Calculation					
Licensee	Slots	Table Games	Table Gaming Positions*	Total Gaming Positions*	Percentage of Gaming Positions
MGM	3,000	100	600	3,600	38.99%
Encore	3,242	168	1,008	4,250	46.03%
Penn	1,250	-	-	1,383	14.98%
	7,492	268	1,608	9,233	100.00%
*Table gaming positions, slots and table gaming positions for casinos not currently open are derived by using the HLT figures from Finance Plan section of the Presentation under 2.3 the table titled Proposed Facility Suitability. For estimating gaming positions from table games at facilities not yet open, a multiplier of 6 for each table game is used. For open facilities, the table in this memorandum is utilized. For PPC, it is the amount approved as of June 2018.					

Revised (January 2019) FY19 Gaming Positions Calculation					
Licensee	Slots	Table Games	Table Gaming Positions*	Total Gaming Positions*	Percentage of Gaming Positions
MGM	2,435	114	841	3,276	36.77%
Encore	3,242	168	1,008	4,250	47.70%
Penn	1,250	-	-	1,383	15.52%
	7,492	268	1,608	8,909	100.00%
*Table gaming positions, slots and table gaming positions for casinos not currently open are derived by using the HLT figures from Finance Plan section of the Presentation under 2.3 the table titled Proposed Facility Suitability. For estimating gaming positions from table games at facilities not yet open, a multiplier of 6 for each table game is used. For open facilities, the table in this memorandum is utilized.					

The result of the balance forward of \$947.3K in unrestricted revenue from FY18 decreased the FY19 assessment from \$28.32M to \$27.37M. If the Commission agrees to the \$3.1M increase in costs it would be offset by the \$860.9K in additional revenue and would result in an additional \$2.24M to be assessed on licensees

Conclusion:

Staff had a meeting on 1/17/19 with representatives from our three licensees. At the time of writing this memorandum there were no formal comments submitted. However, I will discuss briefly in the meeting the topics that were discussed with the licensees.

Staff is seeking a vote to increase the gaming control fund budget to \$36.5M (a \$3.1M adjustment) and increase the licensees' assessments by \$2.24M as described in this memorandum. Staff is also seeking a vote to adjust the assessment calculation for the second half of the year by utilizing MGM Springfield's current gaming positions as described in this memorandum.

Attachment: A FY19 Actuals Spending and Revenue as of 12/1/2018



Massachusetts Gaming Commission

2019		Budget Projections					Through November of 2019		
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed	
10500001--Gaming Control Fund									
MGC Regulatory Cost									
AA REGULAR EMPLOYEE COMPENSATION	\$ 7,301,056.69		\$ -	\$ 167,500.00	\$ 7,301,056.69	\$ 2,733,979.31	37%	42%	
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 89,400.00		\$ -	\$ -	\$ 89,400.00	\$ 24,884.97	28%	42%	
CC SPECIAL EMPLOYEES	\$ 135,000.00		\$ -	\$ -	\$ 135,000.00	\$ 36,900.00	27%	42%	
DD PENSION & INSURANCE RELATED EX	\$ 2,674,809.96		\$ -	\$ 62,209.50	\$ 2,674,809.96	\$ 977,807.44	37%	42%	
EE ADMINISTRATIVE EXPENSES	\$ 601,607.48		\$ -	\$ -	\$ 601,607.48	\$ 169,494.77	28%	42%	
FF PROGRAM, FACILITY, OPERATIONAL SUPPLIES	\$ -		\$ -	\$ -	\$ -	\$ 23,102.00	#DIV/0!	42%	
GG ENERGY COSTS AND SPACE RENTAL	\$ 1,271,894.58		\$ -	\$ -	\$ 1,271,894.58	\$ 538,727.90	42%	42%	
HH CONSULTANT SVCS (TO DEPTS)	\$ 750,644.48		\$ -	\$ 750,000.00	\$ 750,644.48	\$ 557,102.37	74%	42%	
JJ OPERATIONAL SERVICES	\$ 5,643,125.02		\$ -	\$ 1,204,218.35	\$ 5,643,125.02	\$ 1,376,406.65	24%	42%	
KK Equipment Purchase	\$ 96,000.00		\$ -	\$ -	\$ 96,000.00	\$ 17,506.81	18%	42%	
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 36,824.00		\$ -	\$ -	\$ 36,824.00	\$ 10,250.06	28%	42%	
NN NON-MAJOR FACILITY MAINTENANCE REPAIR	\$ 2,500.00		\$ -	\$ -	\$ 2,500.00	\$ 17,877.22	715%	42%	
PP STATE AID/POL SUB/OSD	\$ 150,000.00		\$ -	\$ -	\$ 150,000.00	\$ 60,309.79	40%	42%	
TT PAYMENTS & REFUNDS	\$ -		\$ -	\$ -	\$ -	\$ -	#DIV/0!	42%	
UU IT Non-Payroll Expenses	\$ 3,852,395.46		\$ -	\$ 925,815.03	\$ 3,852,395.46	\$ 1,237,881.14	32%	42%	
MGC Regulatory Cost Subtotal:	\$ 22,605,257.67		\$ -	\$ 3,109,742.88	\$ 22,605,257.67	\$ 7,782,230.43			
EE--Indirect Costs	\$ 2,037,294.23	\$ -	\$ -	\$ -	\$ 2,037,294.23	\$ 678,540.84			
Office of Attorney General									
ISA to AGO	\$ 2,760,000.00		\$ -	\$ -	\$ 2,760,000.00	\$ 817,512.58		42%	
TT Reimbursement for AGO 0810-1024	\$ -				\$ -	\$ -		42%	
AGO State Police	\$ 1,096,997.20				\$ 1,096,997.20	\$ 228,897.34		42%	
Office of Attorney General Subtotal:	\$ 3,856,997.20	\$ -	\$ -	\$ -	\$ 3,856,997.20	\$ 1,046,409.92			
Research and Responsible Gaming/Public Health Trust Fund									
AA REGULAR EMPLOYEE COMPENSATION	\$ 201,973.00		\$ -	\$ -	\$ 201,973.00	81,565.98		42%	
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 6,000.00		\$ -	\$ -	\$ 6,000.00	3,515.30		42%	
CC SPECIAL EMPLOYEES	\$ -		\$ -	\$ -	\$ -	-		42%	
DD PENSION & INSURANCE RELATED EX	\$ 75,012.77		\$ -	\$ -	\$ 75,012.77	29,869.45		42%	
EE ADMINISTRATIVE EXPENSES	\$ 32,995.23		\$ -	\$ -	\$ 32,995.23	4,778.27		42%	
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 1,000.00		\$ -	\$ -	\$ 1,000.00	59.11		42%	
HH CONSULTANT SVCS (TO DEPTS)	\$ 2,454,000.00		\$ -	\$ -	\$ 2,454,000.00	1,046,102.62		42%	
JJ OPERATIONAL SERVICES	\$ -		\$ -	\$ -	\$ -	-		42%	
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 10,000.00		\$ -	\$ -	\$ 10,000.00	\$ 7,020.68		42%	
PP STATE AID/POL SUB	\$ 2,045,000.00		\$ -	\$ -	\$ 2,045,000.00	\$ -		42%	
UU IT Non-Payroll Expenses	\$ -		\$ -	\$ -	\$ -	\$ 1,135.00		42%	
ISA to DPH	\$ -		\$ -	\$ -	\$ -	\$ 309,479.59		42%	
Research and Responsible Gaming/Public Health Trust Fund Subtotal:	\$ 4,825,981.00	\$ -	\$ -	\$ -	\$ 4,825,981.00	\$ 1,483,526.00		42%	
ISA to ABCC	\$ 75,000.00	\$ -	\$ -	\$ -	\$ 75,000.00	\$ -		42%	
Gaming Control Fund Total Costs	\$ 33,400,530.10	\$ -	\$ -	\$ 3,109,742.88	\$ 33,400,530.10	\$ 10,990,707.19			
Revenue Projections									
Revenues	Initial Projection		Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total			
Gaming Control Fund Beginning Balance 0500	\$ -		\$ 947,361.22	\$ -	\$ 947,361.22	\$ 947,361.22			
Phase 1 Collections (restricted) 0500	\$ -		\$ 614,824.22	\$ -	\$ 614,824.22	\$ 614,824.22			
Phase 1 Refunds 0500	\$ -		\$ -	\$ -	\$ -	\$ -			
Phase 2 Category 1 Collections (restricted) 0500	\$ -		\$ -	\$ -	\$ -	\$ -			
Region C Phase 1 Investigation Collections 0500	\$ -		\$ -	\$ -	\$ -	\$ -			
Region C Phase 2 Category 1 Collections 0500	\$ -		\$ -	\$ -	\$ -	\$ -			
Grant Collections (restricted) 0500	\$ 50,000.00		\$ -	\$ -	\$ 50,000.00	\$ -			
Region A slot Machine Fee 0500	\$ 1,945,200.00		\$ -	\$ -	\$ 1,945,200.00	\$ 1,945,200.00			
Region B Slot Machine Fee 0500	\$ 1,800,000.00		\$ -	\$ -	\$ 1,800,000.00	\$ 1,800,000.00			
Slots Parlor Slot Machine Fee 0500	\$ 750,000.00		\$ -	\$ -	\$ 750,000.00	\$ 750,000.00			
Gaming Employee License Fees (GEL) 3000	\$ 300,000.00		\$ 190,402.81	\$ -	\$ 490,402.81	\$ 490,402.81			
Key Gaming Executive (GKE) 3000	\$ 15,000.00		\$ -	\$ -	\$ 15,000.00	\$ 6,000.00			
Key Gaming Employee (GKS) 3000	\$ 20,000.00		\$ 44,700.00	\$ -	\$ 64,700.00	\$ 64,700.00			
Non-Gaming Vendor (NGV) 3000	\$ 25,000.00		\$ -	\$ -	\$ 25,000.00	\$ 30,100.00			
Vendor Gaming Primary (VGP) 3000	\$ 75,000.00		\$ (30,000.00)	\$ -	\$ 45,000.00	\$ 45,000.00			
Vendor Gaming Secondary (VGS) 3000	\$ 25,000.00		\$ (20,000.00)	\$ -	\$ 5,000.00	\$ 5,000.00			
Gaming School License (GSB)	\$ -		\$ -	\$ -	\$ -	\$ -			
Gaming Service Employee License (SER) 3000	\$ 75,000.00		\$ -	\$ -	\$ 75,000.00	\$ 55,050.00			
Subcontractor ID Initial License (SUB) 3000	\$ -		\$ -	\$ -	\$ -	\$ -			
Temporary License Initial License (TEM) 3000	\$ -		\$ -	\$ -	\$ -	\$ -			
Veterans Initial License (VET) 3000	\$ -		\$ -	\$ -	\$ -	\$ -			
Transfer of Licensing Fees to CMF 0500	\$ -		\$ -	\$ -	\$ -	\$ -			
Assessment 0500	\$ 28,320,330.10		\$ (947,361.22)	\$ 2,248,797.63	\$ 27,372,968.88	\$ 14,160,165.06			

Misc/Bank Interest 0500	\$	-	\$	61,018.22	\$	-	\$	61,018.22	\$	61,018.22		
Grand Total	\$	33,400,530.10	\$	-	\$	860,945.25	\$	2,248,797.63	\$	34,261,475.35	\$	20,974,821.53

Budget Projections							Actuals To Date Total	
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)			
10500002								
TT LOANS AND SPECIAL PAYMENTS	\$ -		\$ -	\$ -	\$ -	\$ -	-	42%
Revenue Projections							Actuals To Date Total	
Revenues	Initial Projection		Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)			
Greyhound Balance Forward Simulcast 7200	\$ 150,000.00			\$ -	\$ 150,000.00	\$ -	-	
Plainridge Greyhound Import Simulcast 7200	\$ 27,500.00		\$ -	\$ -	\$ 27,500.00	\$ 9,695.64		
Raynham Greyhound Import Simulcast 7200	\$ 95,000.00		\$ -	\$ -	\$ 95,000.00	\$ 29,163.39		
Suffolk Greyhound Import Simulcast 7200	\$ 25,000.00		\$ -	\$ -	\$ 25,000.00	\$ 6,683.32		
TVG Greyhound Import Simulcast 7200	\$ 2,000.00		\$ -	\$ -	\$ 2,000.00	\$ 4,632.57		
TWS Greyhound Import Simulcast 7200	\$ 1,500.00				\$ 1,500.00	\$ 1,167.93		
Wonderland Greyhound Import Simulcast 7200	\$ 10,000.00		\$ -	\$ -	\$ 10,000.00	\$ 2,105.01		
	\$ 311,000.00	\$ -	\$ -	\$ -	\$ 311,000.00	\$ 53,447.86		

Budget Projections							Actuals To Date Total	
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)			
1050003								
AA REGULAR EMPLOYEE COMPENSATION	\$ 779,111.86		\$ -	\$ -	\$ 779,111.86	\$ 256,720.35		42%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 12,000.00		\$ -	\$ -	\$ 12,000.00	\$ 2,591.68		42%
CC SPECIAL EMPLOYEES	\$ 425,000.00		\$ -	\$ -	\$ 425,000.00	\$ 276,041.50		42%
DD PENSION & INSURANCE RELATED EX	\$ 279,030.65		\$ -	\$ -	\$ 279,030.65	\$ 98,546.44		42%
EE ADMINISTRATIVE EXPENSES	\$ 42,485.00		\$ -	\$ -	\$ 42,485.00	\$ 21,533.48		42%
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 2,000.00		\$ -	\$ -	\$ 2,000.00	\$ -		42%
HH CONSULTANT SVCS (TO DEPTS)	\$ 25,000.00			\$ -	\$ 25,000.00	\$ -		42%
JJ OPERATIONAL SERVICES	\$ 727,758.73		\$ -	\$ -	\$ 727,758.73	\$ 251,932.91		42%
KK EQUIPMENT PURCHASES	\$ -		\$ -	\$ -	\$ -	\$ 300.00		42%
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 915.00		\$ -	\$ -	\$ 915.00	\$ -		42%
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 155,000.00		\$ -	\$ -	\$ 155,000.00	\$ -		42%
NN INFRASTRUCTURE:	\$ -		\$ -	\$ -	\$ -	\$ -		42%
TT LOANS AND SPECIAL PAYMENTS	\$ -		\$ -	\$ -	\$ -	\$ -		42%
UU IT Non-Payroll Expenses	\$ -		\$ -	\$ -	\$ -	\$ 1,626.69		42%
EE --Indirect Costs	\$ 202,687.10		\$ -	\$ -	\$ 202,687.10	\$ 59,704.76		42%
ISA to DPH	\$ 70,000.00		\$ -	\$ -	\$ 70,000.00	\$ -		42%
Grand Total	\$ 2,720,988.34		\$ -	\$ -	\$ 2,720,988.34	\$ 968,997.81		42%

Revenue Projections							Actuals To Date Total	
Revenues	Initial Projection		Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)			
Plainridge Assessment 4800	\$ 121,200.00		\$ -	\$ -	\$ 121,200.00	\$ 41,071.10		
Plainridge Daily License Fee 3003	\$ 108,600.00		\$ -	\$ -	\$ 108,600.00	\$ 36,300.00		
Plainridge Occupational License 3003/3004	\$ 55,000.00		\$ -	\$ -	\$ 55,000.00	\$ 10,905.00		
Plainridge Racing Development Oversight Live 0131	\$ 25,000.00		\$ -	\$ -	\$ 25,000.00	\$ 6,701.95		
Plainridge Racing Development Oversight Simulcast 0131	\$ 135,000.00		\$ -	\$ -	\$ 135,000.00	\$ 45,354.59		
Racing Oversight and Development Balance Forward 0131	\$ 400,000.00		\$ -	\$ -	\$ 400,000.00	\$ -		
Raynham Assessment 4800	\$ 96,150.00		\$ -	\$ -	\$ 96,150.00	\$ 28,750.82		
Raynham Daily License Fee 3003	\$ 108,600.00		\$ -	\$ -	\$ 108,600.00	\$ 32,700.00		
Raynham Racing Development Oversight Simulcast 0131	\$ 133,000.00		\$ -	\$ -	\$ 133,000.00	\$ 33,574.46		
Suffolk Assessment 4800	\$ 526,650.00		\$ -	\$ -	\$ 526,650.00	\$ 173,633.46		
Suffolk Commission Racing Development Oversight Simulcast 0131	\$ 140,000.00		\$ -	\$ -	\$ 140,000.00	\$ 59,117.12		
Suffolk Daily License Fee 3003	\$ 78,000.00		\$ -	\$ -	\$ 78,000.00	\$ 28,200.00		
Suffolk Occupational License 3003/3004	\$ 33,000.00		\$ -	\$ -	\$ 33,000.00	\$ 31,680.00		
Suffolk Racing Development Oversight Live 0131	\$ 22,000.00		\$ -	\$ -	\$ 22,000.00	\$ 12,737.02		
Suffolk TVG Commission Live 0131	\$ 18,000.00		\$ -	\$ -	\$ 18,000.00	\$ 631.32		
Suffolk TVG Commission Simulcast 0131	\$ 125,000.00		\$ -	\$ -	\$ 125,000.00	\$ 90,977.72		
Suffolk Twin Spires Commission Live 0131	\$ 15,000.00		\$ -	\$ -	\$ 15,000.00	\$ 391.81		
Suffolk Twin Spires Commission Simulcast 0131	\$ 97,000.00		\$ -	\$ -	\$ 97,000.00	\$ 50,705.59		
Suffolk Xpress Bet Commission Live 0131	\$ 13,000.00		\$ -	\$ -	\$ 13,000.00	\$ 202.33		
Suffolk Xpress Bet Commission Simulcast 0131	\$ 45,000.00		\$ -	\$ -	\$ 45,000.00	\$ 21,224.32		
Suffolk NYRA Bet Commission Live 0131	\$ 7,500.00		\$ -	\$ -	\$ 7,500.00	\$ 70.72		
Suffolk NYRA Bet Commission Simulcast 0131	\$ 22,000.00		\$ -	\$ -	\$ 22,000.00	\$ 15,718.58		
Transfer to General Fund 10500140 0000			\$ -	\$ -	\$ -	\$ -		

Wonderland Assessment 4800	\$	6,000.00	\$	-	\$	-	\$	6,000.00	\$	2,874.78
Wonderland Daily License Fee 3003	\$	78,000.00	\$	-	\$	-	\$	78,000.00	\$	28,200.00
Wonderland Racing Development Oversight Simulcast 0131	\$	10,000.00	\$	-	\$	-	\$	10,000.00	\$	1,050.87
Plainridge fine 2700	\$	25,000.00	\$	-	\$	-	\$	25,000.00	\$	7,525.00
Suffolk Fine 2700	\$	4,500.00	\$	-	\$	-	\$	4,500.00	\$	3,500.00
Plainridge Unclaimed wagers 5009	\$	168,000.00	\$	-	\$	-	\$	168,000.00	\$	-
Suffolk Unclaimed wagers 5009	\$	250,000.00	\$	-	\$	-	\$	250,000.00	\$	-
Raynham Unclaimed wagers 5009	\$	160,000.00	\$	-	\$	-	\$	160,000.00	\$	-
Wonderland Unclaimed wagers 5009	\$	15,000.00	\$	-	\$	-	\$	15,000.00	\$	-
Misc/Bank Interest 0131	\$	500.00	\$	-	\$	-	\$	500.00	\$	13.83
Grand Total		\$3,041,700.00		\$0.00		\$0.00		\$0.00		\$763,812.39

Budget Projections							
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	
10500004							
PP Grants and Subsidies (Community Mitigation Fund)	\$	-			\$	-	\$ 566,958.62 42%
Revenue Projections							
Revenues	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	
Balance forward prior year	\$	-	\$	-	\$	-	\$ -
Grand Total	\$	-	\$	-	\$	-	

Budget Projections							
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	
10500005							
TT LOANS AND SPECIAL PAYMENTS (Race Horse Dev Fund)	\$	14,400,000.00	\$	-	\$	-	\$ 14,400,000.00 \$ 6,053,293.16 42%
Revenue Projections							
Revenues	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	
Balance forward prior year 3003		\$ 14,500,000.00			\$	14,500,000.00	
Race Horse Development Fund assessment 3003	\$	15,000,000.00			\$	15,000,000.00	\$ 6,910,691.82
Grand Total	\$	15,000,000.00	\$	14,500,000.00	\$	-	\$ 29,500,000.00 \$ 6,910,691.82

Budget Projections							
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	
10500008							
Casino forfeited money MGC Trust MGL 267A S4	\$	7,500.00			\$	7,500.00	\$ 6,000.00 42%
Grand Total	\$	7,500.00	\$	-	\$	-	\$ 7,500.00 \$ 6,000.00

Budget Projections							
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	
10500012/ P promo							
TT LOANS AND SPECIAL PAYMENTS	\$	-	\$	-	\$	-	\$ - 42%
Revenue Projections							
Revenues	Initial Projection		Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	
Plainridge Import Harness Horse Simulcast 0131	\$	3,500.00	\$	-	\$	-	\$ 3,500.00 \$ 6,060.25
Plainridge Racing Harness Horse Live 0131	\$	9,000.00	\$	-	\$	-	\$ 9,000.00 \$ 6,425.46
Raynham Import Plainridge Simulcast 0131	\$	3,500.00	\$	-	\$	-	\$ 3,500.00 \$ 991.60
Suffolk Import Plainridge Simulcast 0131	\$	25,000.00	\$	-	\$	-	\$ 25,000.00 \$ 861.86
Plainridge Racecourse Promo Fund Beginning Balance 7205	\$	50,000.00	\$	-	\$	-	\$ 50,000.00 \$ -
TVG Live 0131			\$	-	\$	-	\$ - \$ -
TVG Simulcast 0131	\$	12,000.00	\$	-	\$	-	\$ 12,000.00 \$ 4,858.46
Twin Spires Live 0131			\$	-	\$	-	\$ - \$ -
Twin Spires Simulcast 0131	\$	14,500.00	\$	-	\$	-	\$ 14,500.00 \$ 3,217.05
Xpress Bets Live 0131			\$	-	\$	-	\$ - \$ -
Xpress Bets Simulcast 0131	\$	3,500.00	\$	-	\$	-	\$ 3,500.00 \$ 1,133.92
NYRA Live 0131			\$	-	\$	-	\$ - \$ -
NYRA Simulcast 0131	\$	1,000.00	\$	-	\$	-	\$ 1,000.00 \$ 362.19
Grand Total	\$	122,000.00	\$	-	\$	-	\$ 122,000.00 \$ 23,910.79

Budget Projections						
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total
10500013/ P Cap						
TT LOANS AND SPECIAL PAYMENTS	\$ 125,000.00	\$ -	\$ -	\$ -	\$ 125,000.00	\$ - 42%
Revenue Projections						
Revenues	Initial Projection		Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total
Plainridge Import Harness Horse Simulcast 0131	\$ 27,500.00		\$ -	\$ -	\$ 27,500.00	\$ 13,183.63
Plainridge Racing Harness Horse Live 0131	\$ 15,000.00		\$ -	\$ -	\$ 15,000.00	\$ 10,496.62
Raynham Import Plainridge Simulcast 0131	\$ 2,500.00		\$ -	\$ -	\$ 2,500.00	\$ 1,802.73
Suffolk Import Plainridge Simulcast 0131			\$ -	\$ -	\$ -	\$ 2,072.27
Plainridge Capital Improvement Fund Beginning Balance 7205	\$ 355,000.00		\$ -	\$ -	\$ 355,000.00	\$ -
TVG Live 0131			\$ -	\$ -	\$ -	\$ -
TVG Simulcast 0131	\$ 30,000.00		\$ -	\$ -	\$ 30,000.00	\$ 15,349.34
Twin Spires Live 0131			\$ -	\$ -	\$ -	\$ -
Twin Spires Simulcast 0131	\$ 30,000.00		\$ -	\$ -	\$ 30,000.00	\$ 7,830.59
Xpress Bets Live 0131			\$ -	\$ -	\$ -	\$ -
Xpress Bets Simulcast 0131	\$ 6,500.00		\$ -	\$ -	\$ 6,500.00	\$ 2,967.05
NYRA Live 0131			\$ -	\$ -	\$ -	\$ -
NYRA Simulcast 0131	\$ 1,200.00		\$ -	\$ -	\$ 1,200.00	\$ 1,388.08
Grand Total	\$467,700.00		\$0.00	\$0.00	\$467,700.00	\$55,090.31

Budget Projections						
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total
10500021/ S promo						
TT LOANS AND SPECIAL PAYMENTS	\$ 146,000.00	\$ -	\$ -	\$ -	\$ 146,000.00	\$ - 42%
Revenue Projections						
Revenues	Initial Projection		Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total
Plainridge Import Suffolk Simulcast 0131	\$ 26,000.00		\$ -	\$ -	\$ 26,000.00	\$ 10,589.05
Raynham Import Suffolk Simulcast 0131	\$ 13,000.00		\$ -	\$ -	\$ 13,000.00	\$ 5,441.89
Suffolk Import Running Horse Simulcast 0131	\$ 60,000.00		\$ -	\$ -	\$ 60,000.00	\$ 17,746.23
Suffolk Racing Running Horse Live 0131	\$ 3,500.00		\$ -	\$ -	\$ 3,500.00	\$ 4,245.66
Suffolk Promotional Fund Beginning Balance 7205	\$ 90,000.00		\$ -	\$ -	\$ 90,000.00	\$ -
TVG Live 0131	\$ 750.00		\$ -	\$ -	\$ 750.00	\$ 210.44
TVG Simulcast 0131	\$ 52,000.00		\$ -	\$ -	\$ 52,000.00	\$ 27,119.49
Twin Spires Live 0131	\$ 300.00		\$ -	\$ -	\$ 300.00	\$ 130.60
Twin Spires Simulcast 0131	\$ 27,000.00		\$ -	\$ -	\$ 27,000.00	\$ 15,206.91
Xpress Bets Live 0131	\$ 100.00		\$ -	\$ -	\$ 100.00	\$ 67.45
Xpress Bets Simulcast 0131	\$ 12,500.00		\$ -	\$ -	\$ 12,500.00	\$ 6,636.03
NYRA Live 0131	\$ 50.00		\$ -	\$ -	\$ 50.00	\$ 23.57
NYRA Simulcast 0131	\$ 4,000.00		\$ -	\$ -	\$ 4,000.00	\$ 5,037.87
Grand Total	\$289,200.00	\$0.00	\$0.00	\$0.00	\$289,200.00	\$92,455.19

Budget Projections						
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total
10500022/ S Cap						
TT LOANS AND SPECIAL PAYMENTS	\$ 525,500.00	\$ -	\$ -	\$ -	\$ 525,500.00	\$ 1,755.00
Revenue Projections						
Revenues	Initial Projection		Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total
Plainridge Import Suffolk Simulcast 0131	\$ 102,000.00		\$ -	\$ -	\$ 102,000.00	\$ 41,314.18
Raynham Import Suffolk Simulcast 0131	\$ 55,000.00		\$ -	\$ -	\$ 55,000.00	\$ 18,113.65
Suffolk Import Running Horse Simulcast 0131	\$ 220,000.00		\$ -	\$ -	\$ 220,000.00	\$ 41,142.43
Suffolk Racing Running Horse Live 0131	\$ 12,000.00		\$ -	\$ -	\$ 12,000.00	\$ 41,292.63
Suffolk Capital Improvement Fund Beginning Balance 7205	\$ 1,200,000.00		\$ -	\$ -	\$ 1,200,000.00	\$ -
TVG Live 0131	\$ 750.00		\$ -	\$ -	\$ 750.00	\$ 526.51
TVG Simulcast 0131	\$ 210,000.00		\$ -	\$ -	\$ 210,000.00	\$ 100,377.61
Twin Spires Live 0131	\$ 500.00		\$ -	\$ -	\$ 500.00	\$ 485.52
Twin Spires Simulcast 0131	\$ 125,000.00		\$ -	\$ -	\$ 125,000.00	\$ 200,398.17
Xpress Bets Live 0131	\$ 1,200.00		\$ -	\$ -	\$ 1,200.00	\$ 161.74
Xpress Bets Simulcast 0131	\$ 47,500.00		\$ -	\$ -	\$ 47,500.00	\$ 24,492.30
NYRA Live 0131	\$ 30.00		\$ -	\$ -	\$ 30.00	\$ 52.81
NYRA Simulcast 0131	\$ 3,500.00		\$ -	\$ -	\$ 3,500.00	\$ 18,810.94
Grand Total	\$1,977,480.00	\$0.00	\$0.00	\$0.00	\$1,977,480.00	\$487,168.49

		Budget Projections						
Row Labels	Initial Projection	FY18 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total		
10500140								
TT LOANS AND SPECIAL PAYMENTS	\$ 721,350.00	\$ -	\$ -	\$ -	\$ 721,350.00	\$ -		42%