



MASSACHUSETTS GAMING COMMISSION
PUBLIC MEETING #290

February 27, 2020
10:00 a.m.
MassMutual Center
1277 Main Street
Springfield, MA



Massachusetts Gaming Commission



**NOTICE OF MEETING and AGENDA
February 27, 2020**

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, February 27, 2020
10:00 a.m.
MassMutual Center
1277 Main Street, Room 1 and 2
Springfield, MA 01103**

PUBLIC MEETING - #290

1. Call to order
2. Approval of Minutes
 - a. February 13, 2020 – **VOTE**
3. Administrative Update – Karen Wells, Interim Executive Director/Dir. Of IEB
 - a. General Update
 - b. Problem Gambling Awareness Month/Research and Responsible Gaming Report - M. Vander Linden, Director of Research and Responsible Gaming
4. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. Springfield Public Safety Update – Marek Vander Linden, Director; Commissioner Gayle Cameron; Commissioner Eileen O'Brien; Christopher Bruce, Crime Analyst
5. Ombudsman – John Ziemba
 - a. MGM Residential Requirement - Joe Delaney, Construction Project Oversight Manager - **VOTE**
 - b. Springfield Chief Development Officer Report - Timothy Sheehan
 - c. MGM Quarterly Report – Chris Kelley, President & COO MGM; Seth Stratton, V.P. Legal Counsel; Saverio Mancini, Dir. of Communications; Ryan Geary, Dir. of Finance; Daniel Miller, Dir. of Compliance; Marikate Murren, V.P. Human Resources; Jose Delgado, Dir. of Government Affairs
6. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. MGM GameSense Update –Teresa Fiore, Program Manager of Research and Responsible Gaming; Chelsea Turner, Director, Mass Council on Problem Gambling; Amy Gabriela, GameSense Supervisor
 - b. Springfield Lottery Impact Study – Mark Vander Linden, Dir., Dr. Mark Nichols, SIEGMA Research Team; Dr. Rachel Vohlberg, SIEGMA Research Team



Massachusetts Gaming Commission

7. Workforce, Supplier and Diversity Development – Jill Griffin, Director of Workforce, Supplier and Development
 - a. Business Tech. Assistant Grant – John Waite, Franklin County Community Development Corporation (FCCDC); Amine Benali, Local Enterprise Assistance Fund (LEAF)

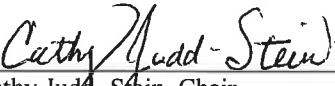
8. Legal – Todd Grossman, Interim General Counsel
 - a. Initial Draft Version of an amendment to **205 CMR 133.04: Duration of Exclusion and Removal from the List**, revising the period between the exit session and re-entry onto the gaming floor after removal from the Voluntary Self-Exclusion list; and Small Business Impact Statement, Todd Grossman, Interim General Counsel; Carrie Torrisi, Associate General Counsel; Mark Vander Linden, Director of Research and Responsible Gaming – **VOTE to begin the promulgation process**
 - b. Final Draft Versions of **205 CMR 134.01 and 134.06 Re: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations**, to authorize Encore Boston Harbor to begin running junkets; and Amended Small Business Impact Statements – **VOTE to finalize the promulgation process**
 - c. Final Draft Version of an amendment to **205 CMR 133.05: Voluntary Self-Exclusion**, to allow licensees to provide an aggregated no-marketing list to junket operators that will include individuals on the Voluntary Self-Exclusion list but will not identify them as being on such list; and Amended Small Business Impact Statement – **VOTE to finalize the promulgation process**
 - d. Final Draft Version of several amendments to **205 CMR 134.00: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations**, to include procedural and administrative updates, and the addition of a waiting period to reapply for a license; and Amended Small Business Impact Statement – **VOTE to finalize the promulgation process**

9. Commissioner Items and Updates

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

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.

02.24.20
Date


Cathy Judd-Stein, Chair

Date Posted to Website: February 25, 2020 at 10:00 a.m.



Massachusetts Gaming Commission



Massachusetts Gaming Commission Meeting Minutes

Date/Time: February 13, 2020 -10:00 a.m.

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

Present: Chair Cathy Judd-Stein
Commissioner Gayle Cameron
Commissioner Enrique Zuniga
Commissioner Bruce Stebbins
Commissioner Eileen O'Brien

Hyperlinks to closed-captioned video
footage of discussions and the
meeting transcript are provided
throughout this document.



Call to Order

See [transcript](#) page 1

[10:06 a.m.](#) Chair Cathy Judd-Stein called to order public meeting #289 of the Massachusetts Gaming Commission.

Approval of Minutes

See transcript pages 1 – 3

[10:06 a.m.](#) *Commissioner Stebbins moved to approve the minutes from the Commission meeting of December 19, 2019, subject to correction for typographical errors and other nonmaterial matters. Commissioner O'Brien seconded the motion. A small edit was requested (see video and transcript). The motion passed unanimously, as amended.*

Commissioner Stebbins moved to approve the minutes from the Commission meeting of January 23, 2020, subject to correction for typographical errors and

other nonmaterial matters. Amendments were requested (see video and transcript). Commissioner Zuniga seconded the motion. The motion passed unanimously, as amended.

Administrative Update

See [transcript](#) pages 3 – 10

10:14 a.m. General Update

Interim Executive Director/Director of Investigations and Enforcement Bureau (IEB) Karen Wells reported that Jim Murren, CEO of MGM International, will be stepping down from his position. She commended him for supporting the Springfield project, and for his efforts regarding diversity in the workplace. Mr. Murren will remain in his position until it is filled.

Ms. Wells also reported that as a member of the International Association of Gaming Regulators board, she attended the board meeting last week, where she discussed a variety of topics with the members. She stated that she is grateful for the opportunity to discuss gaming regulation and different issues, gaining different perspectives from these international regulators. Ms. Wells stated that the board members are all looking forward to the 2020 Conference to be held in Boston.

10:19 a.m. Information Technology (IT) Director Katrina Jagroop-Gomes updated the Commission on current activities, projects, and changes that have and are occurring in the IT Services department. She reviewed PowerPoint slides with the Commission and described current major projects, responsibilities of her team, as well as open positions within the IT department.

10:31 a.m. Draft Region C Request for Information (RFI) and draft Request for Public Comments Status Report

Ms. Wells reported on the status of the request for public comments and on the draft RFI that the staff has posted. She stated that the deadline for public comment submission is March 16, 2020. She noted that the Commission has received a significant amount of media coverage regarding this topic. Ms. Wells stated that there is an ongoing effort from the Commission to solicit responses from the public via social media, and once the responses are collected, she will provide this information to the Commission.

10:33 a.m. Two MGM Qualifiers

Ms. Wells requested that the Commission approve Janet Swartz, Outside Director at MGM Resorts International, as a Qualifier for MGM Springfield. Ms. Wells described investigators' findings on this matter and recommended that the Commission approve Ms. Swartz.

[10:36 a.m.](#) *Commissioner Cameron moved that the Commission find Janet Swartz suitable as a Qualifier for Blue Tarp reDevelopment, LLC. Commissioner Zuniga seconded the motion.
The motion passed unanimously.*

Next, Ms. Wells requested that the Commission approve Craig Jacobs, Vice President of Information Technology Operations at MGM Resorts International as a Qualifier for MGM Springfield. Ms. Wells described investigators' findings on this matter and recommended that the Commission approve Mr. Jacobs.

[10:41 a.m.](#) *Commissioner Zuniga moved that the Commission find Craig Jacobs suitable as a Qualifier for Blue Tarp reDevelopment, LLC. Commissioner Stebbins seconded the motion.
The motion passed unanimously.*

Ombudsman

See [transcript](#) pages 10 – 18

[10:42 a.m.](#) **MGM Residential Requirement Fulfilment**
Ombudsman John Ziembra and Construction Project Oversight Manager Joe Delaney briefed the Commission on the current status of MGM Springfield's residential requirement to provide 54 units of market-rate housing within one-half mile of the casino. Presenting with them was Assistant Secretary -Executive Office for Administration and Finance Mark Attia, City of Springfield Chief Development Officer Timothy Sheehan, Michael O'Brien from the Winn Companies, and Vice President & General Counsel MGM Springfield Seth Stratton.

Ombudsman Ziembra reported that earlier in the week, Mayor Sarno of Springfield issued a statement regarding positive news about the status of the 31 Elm Street project. That statement was followed by a review of the project by Springfield's Casino Oversight Committee.

[10:45 a.m.](#) Mr. Stratton reviewed a letter with the Commission that is included in the [Commissioner's Packet](#), providing detail concerning the history, MGM Springfield's position, and highlighting the key elements of MGM Springfield's involvement in the 13-31 Elm Street project with the Commission.

[10:52 a.m.](#) Mr. Attia provided the Commission with an overview of how the framework and nature of the cooperative funding agreement amongst the parties, and addressed the Chair's concern regarding the timing of the construction, explaining that the cooperative agreement contemplates certain time limitations to commence with the project.

Next, Mr. Stratton reported that Mr. Sheehan and Mr. O'Brien, and he went to the Casino Oversight Committee meeting and that everyone was enthusiastic about this development. They anticipate that a final approval will go very well.

[11:03 a.m.](#) Mr. O'Brien and Mr. Sheehan described the City's approval process for the project to the Commission. They stated that they would be restoring the property historically, making sure all historical elements are preserved and protected. Mr. O'Brien described the project plan to the Commission.

Mr. Attia stated that there are potential tax benefits for the City of Springfield that will be associated with the income-producing property. He also stated that it satisfies the need for economic development around the casino area, and brings economic spending power from new residents back into downtown Springfield.

The Chair thanked the team for all of their collaborative efforts on this project. She also acknowledged that the new president of MGM Springfield, Chris Kelly, is in attendance today to observe. The Commission will hold its next meeting in Springfield, where Mr. Kelly will be formally introduced.

Workforce, Supplier and Diversity Development

See [transcript](#) pages 18 – 21

[11:15 a.m.](#) **Vendor Spotlight Update**

During Black History Month, the Commission recognized one of the oldest Black-owned businesses in New England, Owens Movers. Recently the company worked on Encore Boston Harbor pre-opening moving of gaming tables, along with gaming equipment into the nearby dealer training school, relocating table games, and performing multiple on-demand jobs for the casino.

Director of Workforce, Supplier and Diversity Development Jill Griffin introduced the father-and-son team of CEO Eddie Owens and CFO Ed Owens, Jr. of Owens Movers. She described the history of the company to the Commission.

[11:17 a.m.](#) Mr. Owens Sr. described his observations as to how the casino has made a positive impact on the City of Everett and thanked the Commission as well as Encore Boston Harbor.

Mr. Owens, Jr. further described Owens Moving, and how his family came to do business as Owens Movers. He also thanked the Commission as well as Encore Boston Harbor for allowing them to provide services. Mr. Owens Sr. made closing comments.

Licensing

See [transcript](#) pages 21 – 38

[11:34 a.m.](#) **Encore Boston Harbor Alcohol License Amendment Request**

Licensing Manager Bill Curtis described the three separate amendment requests to Encore Boston Harbor's Gaming Beverage License via a memorandum provided in the [Commissioners' Packet](#). With him was Senior V.P. & General Counsel for Encore, Jacqui Krum, and Executive Director of Food & Beverage, Warren Richards.

Encore Boston Harbor's first request is for additional alcohol storage. The second request is for an additional alcohol beverage outlet, and the third request is for a change in the description of the licensed area. He provided an overview of each application for the Commission. He also directed Encore to review their internal controls for alcoholic beverages upon approval of their request and ensure that the changes are reflected there.

[11:38 a.m.](#) Mr. Richards took the Commission through a slide presentation that illustrated and described Encore Boston Harbor's amendment requests in detail. He explained that the adjustment requests are based on the demands of various areas throughout the building.

[11:42 a.m.](#) Concerning the first-floor alcohol storage for Fratelli restaurant, Commissioner O'Brien expressed concern regarding the storage units being on wheels and readily moveable. Mr. Richards replied that they are currently on wheels for ease of cleaning the area, but they can be affixed in place. Commissioner O'Brien then asked if the wheeled cages cause any issues in terms of fire code or egress, and Mr. Richards answered that the width of the corridor is not an issue with Everett Fire Department.

The Chair asked for clarification as to why Encore did not build a hallway with affixed storage instead of wheeled cages. Mr. Richards answered that they are going to investigate a more permanent solution now that the casino is in full operation.

Commissioner Stebbins voiced his concern that there is the potential for employees to forget to lock the storage door. Ms. Krum confirmed that there is surveillance in this area.

[11:57 a.m.](#) Next, Mr. Richards reviewed slides entitled, "Casino Beverage Service," and described the scenario that led to the installation of EasyBar self-service towers. He described the terminals and how the staff uses the system. Ms. Krum then explained how implementing these drink systems will alleviate the bottleneck in service that guests have been experiencing.

[12:02 p.m.](#) Commissioner Cameron addressed public comments regarding concerns about the speed of service, as well as bartender jobs. Mr. Richards described comments that he received from casino guests, indicating that there is approximately an hour wait for a cocktail server. The Chair asked how many bartender jobs were lost due to the implementation of the EasyBar machines. Mr. Richards stated that

Encore has placed 30 bartenders in other positions in the beverage department on property. He added that jobs now at the service bar are paying a higher hourly rate, compensating for the loss of guest tips, and these bartenders will instead receive a percentage of the servers' tips. Four bartenders have accepted a transfer to other departments. One bartender is currently undecided, and eight bartenders have decided to leave the company. He then stated that anyone who has chosen to leave is eligible for re-hire.

12:12 p.m. Commissioner O'Brien asked what Fratelli's is doing at this time for alcohol storage. Mr. Richards stated that it is a daily struggle for them currently. She then asked if it would help them if the Commission were to recommend that they affix the storage. Mr. Richards replied yes, and that they could complete it within a week. They discussed her concern regarding Encore having moveable alcohol storage cages in further detail.

Mr. Curtis and Acting General Counsel Todd Grossman provided the Commission with licensing info for the vendors concerning the ABCC and the Commission's Gaming License and c. 130A and 23K.

12: 20 p.m. Commissioner O'Brien suggested affixing the cages with the understanding that this is a six-month review. She added that the alcohol storage should continue to be looked, and should be more secure and not visible to people.

Commissioner Stebbins asked if by removing a full-time employee from that alcohol storage area, what safeguards would be in place to ensure that no one can gain entry to the area. Ms. Krum replied that if anyone did gain access from the casino floor, they would not be able to access any of the alcohol. However, they intend to employ a full-time bar porter for the area.

12:25 p.m. *Commissioner Zuniga moved that the Commission approve Wynn MA LLC's request to use an Easy Bar self-service tower in their service bar numbers one through six and number eight in accordance with the terms and conditions discussed here today. Commissioner Cameron seconded the motion. The motion passed unanimously.*

The Chair noted that with regard to Salon Privé, there will be no bottle service.

Commissioner Zuniga further moved that the Commission approves Wynn MA, LLC's request to add a newly licensed area, referred to as Salon Privé, as described on slides 13 and 14 in the PowerPoint presentation. Commissioner Stebbins seconded the motion. The motion passed unanimously.

Regarding Encore's request for additional alcohol storage, Commissioner O'Brien recommends a motion that references approval for a six-month period with the condition that the cages be locked. Further, before the end of the end of th

ose six months, both IEB and Licensing, with the licensee, should return to the Commission for a review of whether that can be improved in terms of the visibility and the egress in the hallway. Mr. Richardson stated that he anticipates the alcohol will be in an approved and RFID secured floor and that they will lock the cages to the wall today. He is investigating a more permanent spot.

Commissioner Zuniga moved that the Commission approve Wynn MA LLC's request to add seven new alcoholic beverage storage areas as depicted on slide number four and labeled one through three and five through eight, submitted in the PowerPoint presentation in accordance with the terms discussed here today. Commissioner Cameron seconded the motion.

The motion passed unanimously.

Commissioner O'Brien further moved that the Commission approve subject to confirmation of the cages being affixed, the storage beverage area that is referenced on slide four of the PowerPoint today bulleted as number four outside Fratelli's with the further understanding that on or before six months from today's date that a review will be conducted in terms of the visibility and the storage of that location. Commissioner Cameron seconded the motion.

The motion passed unanimously.

Ombudsman

See [transcript](#) pages 38 – 49

1:09 p.m.

Quarterly Report Template

Mr. Ziemba described the draft of the updated template for quarterly reports with the Commission. With him were Ms. Griffin and Construction Project Oversight Manager Joe Delaney.

Mr. Ziemba recommends developing a more concrete system to flag certain items for the Commission's attention. He stated that one of the most valuable parts of this endeavor would most likely be achieving compliance and greater cooperation between and among all of the various divisions.

1:18 p.m.

Ms. Griffin recommends incorporating a snapshot of diversity by management level to describe how employees are doing in terms of getting promoted to managerial or supervisor jobs into the template.

Mr. Ziemba stated that he would like to continue to work with licensees to determine how to capture quarterly some of the more exceptional impacts on the communities themselves. Next, he stated that he would like to include some of the Commission's capital spending requirements in the reports, and continue to work with licensees on much of the financial reporting. Lastly, he would like to encourage licensees to incorporate relevant information regarding responsible gaming activities in their quarterly reports or their PowerPoints.

[1:25 p.m.](#) Commissioner Zuniga suggested creating in addition to the four quarterly reports, the creation of a fifth report that could be submitted annually, for compliance purposes that need only be reported annually. This would also aid with the comparison of statistics for compiling the Commission's annual report.

The Chair stated that the Commission might have tools to help determine what data is needed for review at what particular period of time moving forward, to assist the licensees through a proper forum to prompt that review.

[1:34 p.m.](#) **Mitigation Intake Review**
Mr. Ziemba reviewed the process for reviewing the Community Mitigation Fund applications and summarized the available grants by category. He reported that there were a number of applications received for Transportation Construction grants, the new category that was added this year.

[1:42 p.m.](#) Commissioner Zuniga asked that the Review Committee returns to the next Commission meeting to report on the status of the fund as a whole, looking back to how much has been awarded, what is pending, and a target projection for the coming year.

Investigations and Enforcement Bureau

See [transcript](#) pages 49 – 62

[1:49 p.m.](#) **Plainridge Park Casino License Renewal Follow-Up & Timeline**
Mr. Grossman stated that the license awarded to Plainville Gaming Redevelopment LLC is set to expire on June 24 of this year. The agenda for today is to establish the procedures for renewal and commemorate them in writing. The Commission reviewed the draft of the plan. Mr. Grossman would like to take the decision and commemorate it in a written letter to the licensees that would then initiate the renewal process. He then reviewed with the Commission each section of the proposal via the Renewal Procedures Letter in the [Commissioners' Packet](#).

[2:10 p.m.](#) There was a discussion of several edits that could be made to the draft application (see [video link](#) and [transcript](#) starting on page 53). The Commission reached a consensus on final edits to be made.

[2:29 p.m.](#) Ms. Wells confirmed with the Commission the edits that are to be made to the draft application (see [video link](#) and [transcript](#) starting on page 61).

[2:32 p.m.](#) *Commissioner O'Brien moved that the Commission approve the procedures for the renewal of a Category Two gaming license as outlined in the memorandum included in the Commissioners' packet and as further discussed here today. Commissioner Stebbins seconded the motion. The motion passed unanimously.*

*Commissioner O'Brien further moved that Commission authorizes staff to serve a letter on the gaming licensee commemorating the approved renewal procedures and to take steps to facilitate the renewal process consistent with the discussion today and the timeline in the memorandum that is included in the Commissioners' packet. Commissioner Cameron seconded the motion.
The motion passed unanimously.*

Commissioner Items and Updates

See [transcript](#) pages 62 – 66

[2:33 p.m.](#)

Update on Executive Director Search

Commissioner Zuniga and CFO Derek Lennon updated the Commission on the status of the search for a new executive director. They together drafted a new Request for Response (RFR). They also posted an intention to post an RFR to advise potential respondents and bidders that it is upcoming. Mr. Lennon stipulated the two phases of the Commission's approach. Mr. Lennon explained how the team devised the RFR by reviewing items discussed at prior Commission meetings.

[2:41 p.m.](#)

Update on (Wynn) Independent Monitor's Report

The Chair updated the Commission on Miller & Chevalier, the independent monitor's request for an extension on the due date for their baseline report. She anticipates that there will be a hearing near the end of March or the beginning of April.

[2:44 p.m.](#)

*Commissioner O'Brien moved that the Commission grant the independent monitor's request for an extension for the submission of the six-month baseline. The deadline currently set for March 5 is to be extended to a date prior to the end of March. Commissioner Cameron seconded the motion.
The motion passed unanimously.*

[2:45 p.m.](#)

*With no further business, Commissioner Stebbins moved to adjourn the meeting. Commissioner Zuniga seconded the motion.
The motion passed unanimously.*

List of Documents and Other Items Used

1. Notice of Meeting and Agenda dated February 13, 2020
2. Draft Commission Meeting Minutes dated December 19, 2019
3. Draft Commission Meeting Minutes dated January 23, 2020
4. Information Technology Services PowerPoint Presentation dated February 24, 2020
5. Letter Re: 31 Elm Street Development dated February 10, 2020
6. Slide Presentation: "The Revitalized 13-31 Elm Street"
7. Modified Final Grant Agreement Draft

8. Modified Fifth Amendment to the Host Community Agreement by and Among the City of Springfield
9. Memorandum Re: Black History Month Vendor Spotlight – Owens Movers dated February 13, 2020
10. Memorandum Re: Encore Boston harbor Gaming Beverage License Amendment Applications
11. Gaming Beverage License Amendment Application Forms for Encore Boston Harbor
12. Encore Boston Harbor Appendix to Gaming Beverage License Amendment Application Forms
13. Public Comment #1 Re: Encore Bartenders dated December 27, 2019
14. Public Comment #2 Re: Encore Bartenders dated January 11, 2020
15. Memorandum Re: Review of the Format of the Quarterly Reports Submitted by Licensees dated February 10, 2020
16. Memorandum Re: 2020 Community Mitigation Fund Applications
17. Memorandum Re: Renewal of the Category 2 Gaming License dated February 13, 2020
18. PPC Renewal Procedures Letter draft\
19. Request to Renew Category 2 Gaming License dated February 5, 2020
20. Letter Re: Uploaded Scope of Licensing Letter – Additional Qualifier dated February 2, 2020

/s/ Bruce Stebbins
Secretary



RESEARCH AND RESPONSIBLE GAMING

OVERVIEW OF ORGANIZATION AND ACTIVITIES

FEBRUARY 27, 2020



NATIONAL PROBLEM GAMBLING AWARENESS MONTH (PGAM)

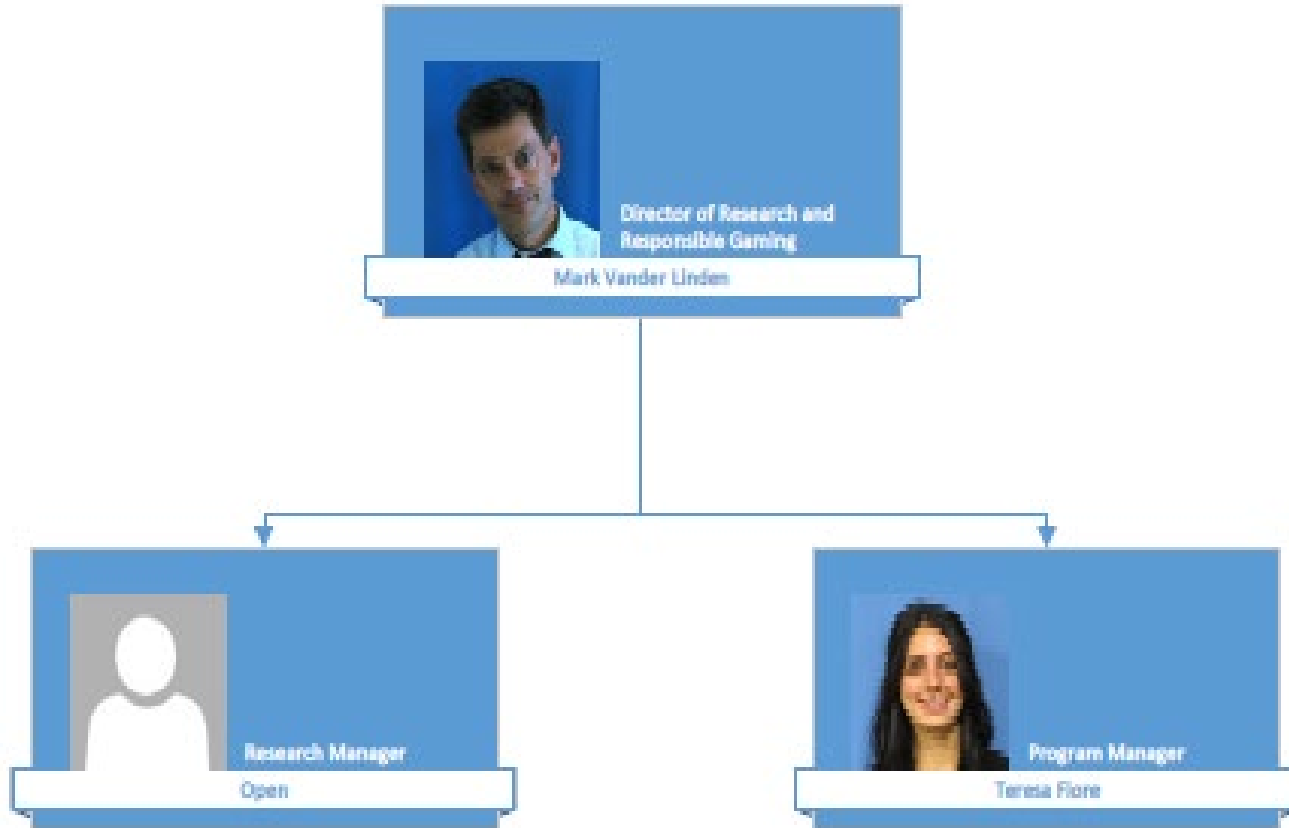
March 2020 is Problem Gambling Awareness Month. PGAM is a national outreach campaign designed to educate the public about problem gambling and the resources available.

This year's PGAM theme of "Awareness + Action".

We have a full month of initiatives and activities tapping into robust research program and comprehensive approach to responsible gaming.



RESEARCH & RESPONSIBLE GAMING TEAM



SERVICE AREAS

Research

- Direct research as required by Sect. 71
 - Social impacts
 - Economic impacts
 - Public safety
 - Community driven
 - Evaluation
- Coordinate and facilitate Research Review Committee
- Research dissemination and mobilization

Responsible Gaming

- Oversee on-sight resource, GameSense
- Promote a comprehensive approach responsible gaming through commission activities, casino operations, community engagement
- Oversee the development, expansion of PlayMyWay as a key responsible gaming tool
- Pursue innovative approaches to promoting safe play and mitigate gambling related harm

GAMESENSE UPDATE

GameSense Advisors work in the GameSense Info Ctr. 16 hours/day/ 7 days/week to:

- Promote positive play
- Foster an RG enabled casino workforce
- Mitigate gambling related harm

Outside the casino GameSense Advisors provide education to targeted groups

Emerging initiatives in 2020:

- Veteran's outreach
- Positive play initiative
- VSE resource liaison
- Augmented reality
- 24/7 trial at EBH



RESEARCH UPDATE

Significant SEIGMA & MAGIC research activities:

- New employee survey @ MGM, EBH, PPC
- Casino operations data collection
- EBH Construction data collection
- Follow-up Springfield Targeted population survey
- MGM Patron survey data collection
- MAGIC Wave 5

Knowledge Mobilization

- Chinese translation of *Talking about Casino Gambling: Community Voices from Boston Chinatown*
- Research Snapshots (attached)
- Data storage and sharing project



RESEARCH UPDATE

Publications

To date MGC research has generated 8 publications in the following academic journals:

- *International Journal of Mental Health and Addiction.*
- *The American Journal on Addictions.*
- *Journal of Gambling Studies.*
- *Journal of Addiction Medicine.*
- *Journal of Behavioral Addictions.*

In 2019 the following articles were published:

- Venne, D., Mazar, A., & Volberg, R. (2019). Gender and Gambling Behaviors: a Comprehensive Analysis of (Dis)Similarities. *International Journal of Mental Health and Addiction.*
- Freeman, J., Volberg, R., & Zorn, M. (2019). Correlates of At-Risk and Problem Gambling Among Veterans in Massachusetts. *Journal of Gambling Studies.*



OPPORTUNITIES SHARING & LEARNING

Confirmed:

March 10 - 12 BCLC New Horizons Conference on RG, Vancouver, BC

April 13 – 17 NCPG International Advisory Committee, Singapore

May 29 Trends in Reducing Gambling Harm & Promoting Positive Play, Natick

Proposals under consideration: to

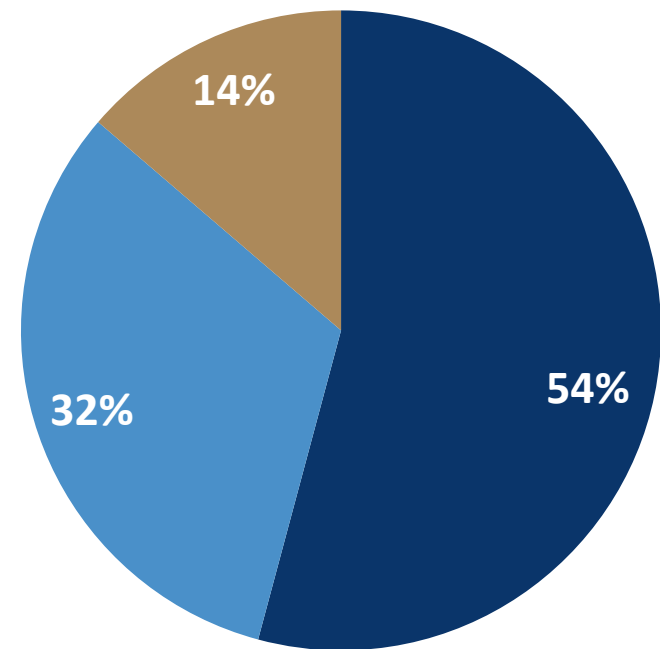
- International Assoc. Gaming Regulators
- American Public Health Association
- National Council on Problem Gambling



FY2021 BUDGET SETTING

- Funding for MGC's Research and Responsible Gaming initiatives comes from the Public Health Trust (MGL 23k Sect. 58).
- The budget and funding priorities are established by the Public Health Trust Fund Executive committee.
- A vote by the PHTF EC on the proposed FY21 budget is expected in March.
- The total proposed budget is \$6,149,000. This is approx. \$400k less than FY2020.

■ Responsible Gaming ■ Research
■ Personnel + indirect ■ Communications





TO: Chair Judd-Stein, Commissioners Cameron, O'Brien, Stebbins and Zuniga
FROM: Mark Vander Linden, Director of Research and Responsible Gaming
DATE: February 27, 2020
RE: Research Update

Released Reports & Studies, July 2019 – January 2020

Knowledge Translation: Gambling Research Exchange of Ontario (GREO) Research Snapshots of SEIGMA Studies

[Gender and Gambling Behaviors: a Comprehensive Analysis of \(Dis\)Similarities](#) RESEARCH SNAPSHOT

Authors: Danielle Venne, Alissa Mazar, and Rachel Volberg

Publication: *International Journal of Mental Health and Addiction*

[Correlates of At-Risk and Problem Gambling Among Veterans in Massachusetts](#) RESEARCH SNAPSHOT

Authors: Joshua Freeman, Rachel Volberg, and Martha Zorn

Publication: *Journal of Gambling Studies*

[Gender Differences in Mental Health and Substance Use Disorders and Related Healthcare Services Utilization](#) RESEARCH SNAPSHOT

Authors: Evelyn Brand, Rosa Rodriguez-Monguio, and Rachel Volberg

Publication: *The American Journal on Addictions*

[The Importance of Friends and Family to Recreational Gambling, At-Risk Gambling, and Problem Gambling](#) RESEARCH SNAPSHOT

Authors: Alissa Mazar, Robert J. Williams, Edward J. Stanek III, Martha Zorn, and Rachel A. Volberg

Publication: *BMC Public Health*

[Comorbid Pathological Gambling, Mental Health, and Substance Use Disorders: Health-Care Services Provision by Clinician Specialty](#) RESEARCH SNAPSHOT

Authors: Rosa Rodriguez-Monguio, Maria Errea, and Rachel Volberg

Publication: *Journal of Behavioral Addictions*

Economic Impacts of Plainridge Park Casino: Four Years of Operations

Thomas Peake, Abigail Raisz, and Kazmiera Breest (Released: MGC open meeting, November 7, 2019, Plainville, MA)

In October of 2017, the UMass Donahue Institute's Economic and Public Policy Research Unit (UMDI), as part of the [SEIGMA](#) research team, published a [report](#) of the first year of operation at Plainridge Park Casino (PPC)—the first casino to open in Massachusetts following the passage of the Expanded Gaming



Massachusetts Gaming Commission

Act in 2011. That report utilized proprietary data from PPC provided to UMDI under PPC's agreement with the Massachusetts Gaming Commission (MGC) on employment, wages, and spending, along with revenue data from the MGC. The report also included findings from a [survey of PPC patrons](#) conducted on-site during that first year of operation. The data from that survey, along with the operations data from PPC and the MGC, allowed UMDI to produce a full economic impact analysis using a REMI PI+ economic impact model.

In subsequent fiscal years, budgetary constraints have prevented the SEIGMA team from dedicating resources to additional patron surveys. Operating data from PPC and the MGC, however, have continued to be collected and tabulated. This report aims to illustrate how operations at PPC have changed in the last three fiscal years, but it does not employ a full economic impact analysis since we do not have information on how patron behavior has changed since the first year of operation. This report is presented as a time-series, as it analyzes the first four years of operation at PPC (FY 2016, FY 2017, FY 2018, and FY 2019) with a focus on Fiscal Years 2017, 2018, and 2019.

This report's main findings:

- Employment at PPC has declined. When PPC opened in summer 2015, it employed 555 employees at its peak. At the end of fiscal year 2019, PPC employed just over 450 employees.
- Full-time employees represent the majority of PPC's workforce in all four fiscal years of operation. Median hourly wages for full-time workers have increased faster than for part-time workers.
- In-state spending on private vendors dropped in fiscal year 2019, while out-of-state spending has seen a gradual increase. 54.5% of PPC's private sector spending was on vendors outside of Massachusetts, and 26.3% was spent in the Metro Boston region.
- Plainridge spent less money on private sector vendors and increased its payment to charitable organizations in fiscal year 2019.
- Revenues have been trending slightly upwards (approx. \$160M in FY2016, \$158M in FY2017, \$170M in FY2018, and \$169M in FY2019). However, each successive year has seen lower visitation than the previous year.
- Average annual gross gaming revenue brought in per PPC patron has increased by 27% from fiscal year 2016 to fiscal year 2019. This change in patron behavior has driven the rise in revenues, even as visitation has fallen.

New Employee Survey at Plainridge Park Casino: Analysis of Fiscal Year 2018

Andrew L. Hall (Released: MGC open meeting, November 7, 2019, Plainville, MA)

The findings of this report are based on an analysis of the third year of data collected from the Massachusetts Gaming Commission (MGC) New Employee Survey administered at Plainridge Park Casino in Plainville, Massachusetts. The period captured in this analysis is fiscal year 2018, which roughly spans the time from the summer of 2017 to the summer of 2018. During this period, 193 survey responses were collected. This study follows the [New Employee Survey at Plainridge Park Casino: Analysis of First Two Years of Data Collection](#) report that documented new employee characteristics during the first two years of operation. Survey respondents in both studies include newly hired employees of different types: employees who already worked for Plainridge Racecourse before the Commission designated it as the Commonwealth's only slots parlor; those who are new to the gaming industry; employees who were permanently transferred from other gaming properties operated by the casino licensee, Penn National; and employees of food-court vendors. Respondents completed the

survey during the fingerprinting process, which is the only step in the gaming-licensing process, where they appear in person.

In general, the investigators found that the new employment opportunities created at Plainridge Park Casino have benefited people who have experienced unemployment or underemployment and those with little educational attainment, experience, or training. Hiring at Plainridge Park Casino has also generated interest in employment in this industry, evident from the career-related reasons new employees provided for seeking employment at Plainridge Park Casino.

- 46% of respondents hired in 2017-2018 reported being previously unemployed or employed only part-time. 76% of people who were previously unemployed are in full-time positions at the casino. 42% of those who previously worked in part-time jobs now work full-time at the casino.
- 75% of new employees in 2017-2018 have less than a bachelor's degree, and 82% of casino employees lacked previous casino-related experience.
- The three major reasons why recent hires wanted to work at PPC include 1) the opportunity for career advancement; 2) improved pay, and 3) the opportunity to learn new skills or receive training.
- 67% of people hired in 2017-2018 are Massachusetts residents and 33% commute from out-of-state, mainly from Rhode Island.

Social and Economic Impacts of Plainridge Park Casino: 2018

UMass Amherst research team (Released: MGC open meeting, November 7, 2019, Plainville, MA)

In September 2018, a comprehensive report on the [*Social and Economic Impacts of Expanded Gambling in Massachusetts: 2018*](#) (SEIGMA Research Team, 2018) was produced that described both the regional and statewide impacts of expanded gambling in Massachusetts as of mid-2018. The present report is an extraction of information from that report specific to the impacts of the construction and operation of Plainridge Park Casino (PPC). Two fact sheets summarizing PPC's impacts on traffic and social/public health indicators were also crafted and released. Charts from those fact sheets are presented below.

In general, the overall impacts of PPC to date have largely been positive, with clear positive economic impacts along with relatively minor negative social impacts. The profile of specific impacts is described below.

Social and Health Impacts

- There has been no significant change in the prevalence of problem gambling or related indices (treatment-seeking, bankruptcy, divorce/separation, suicides) in the PPC Host and Surrounding Communities (H&SC).
- There has been no significant change in the overall amount of crime in the PPC H&SC.
- There has been a significant change in the PPC H&SC attitudes toward gambling. A greater portion of people in the region now report being satisfied with the availability of gambling. However, there has also been a decrease in the percentage of people who believe casinos will be beneficial to Massachusetts and an increase in the percentage of people with more neutral opinions about PPC (i.e., more people believing it will be neither beneficial nor harmful).
- There has been no significant change in population health (health, happiness, stress, substance use, addictions) in the PPC H&SC that can be attributed to casino introduction.
- There has been no change in overall gambling involvement in the PPC H&SC or the percentage of people who consider gambling to be an important leisure activity.

- There has been no change in the broader population demographics in the PPC H&SC that can be attributed to casino introduction.

Economic and Fiscal Impacts

- The building of PPC has had significant economic benefits. Penn National spent \$150.2 million building PPC and employing a large local workforce in the construction. A total of 87% of this direct spending was within Massachusetts as was 81% of the construction workforce, with the majority of spending and employment occurring in Bristol and Norfolk Counties (where PPC is located). Economic modeling suggests that PPC construction created 1,286 net new jobs, \$104.4 million in net new personal income, and \$121.8 million in net new economic activity in the state, with most of this occurring within Bristol and Norfolk Counties.
- The operation of PPC is also creating significant economic benefits as most of the \$176 - \$186 million annual revenue appears to represent new money from 'recaptured' Massachusetts casino patrons (i.e., Massachusetts residents who reported they would have gambled out-of-state if not for PPC) and out-of-state patrons. Furthermore, the large majority of this revenue stays in the state. Of the \$129.5 million in operational expenses (taxes, wages, supplies) in PPC's first year of operation, 87% were spent within Massachusetts. Also, slightly more than 500 people have ongoing employment at the casino, with approximately 71% being in-state employees. A significant portion of these are 'new' jobs as people taking the positions were either unemployed or working part-time prior to beginning work at the casino. After accounting for losses to other sectors of the economy due to reallocated consumer spending to PPC, economic modeling projects 2,417 net new jobs were created in the first year of operation, as well as \$143.7 million in net new personal income and \$362.4 million in net new economic activity, with most of this occurring within the Metro Boston region.
- There is no strong direct evidence that the overall number of businesses has significantly changed as a direct result of PPC or that the construction and/or operation of PPC has differentially impacted certain types of businesses. That said, economic modeling does project \$72.4 million in additional economic activity in Bristol and Norfolk Counties due to PPC construction and \$326.3 million in additional economic activity in the Metro Boston and Southeastern regions associated with PPC operation prior to considering reallocation. In addition, there is an unambiguous rejuvenation of racing at Plainridge Racecourse, which is primarily due to the funds provided from the Race Horse Development Fund (which is funded by PPC slot revenue).
- There has been a slight increase in wages and a slight decrease in the poverty rate in Plainville, but it is uncertain whether this is attributable to the casino. However, economic modeling does show significant increases in personal income in Bristol and Norfolk Counties due to PPC construction and to the Metro Boston and Southeast regions due to PPC operation.
- It is unlikely that PPC has impacted local property values or rental costs.
- Government impacts from casino gambling have not been extensively analyzed. There are some financial costs in Plainville due to the strain on infrastructure and local government services as well as the fact that the local populace disproportionately contributes to PPC revenue. However, this is offset by revenue from Host and Surrounding Community agreements with PPC, PPC property taxes, and Local Aid from the state government from taxes on casino gross gaming revenue.

Summary of Impacts

SOCIAL and HEALTH IMPACTS		Change from baseline to follow up
Problem Gambling and Related Indices	Prevalence and Incidence of Problem Gambling; Treatment Seeking for Problem Gambling	↔
	Financial Problems, Bankruptcy, Employment Problems	↔
	Divorce, Separation, Domestic Violence, Child Abuse and Neglect; Suicide	↔
Crime	Overall Crime Rates; Illegal Gambling	↔
Attitudes	Attitudes Towards Gambling	↓ ↑
Population Health & Leisure	Physical and Psychological Health; Substance Use and Addictions; Leisure Activity	↔
Demographics	Population; Educational System	↔
Environment	Traffic (accidents, volume); Noise	↑

ECONOMIC AND FISCAL IMPACTS		Change from baseline to follow up
Direct Casino Expenditure and Revenue	Plainridge Park Casino	↑
Business Establishments	Number of Business Establishments; Impacts on Other Types of Gambling	↑
Employment	Employment Levels, Labor Force Participation	↑
Personal Income	Wages	↑
	Poverty Rate	↓
	Gambling Participation in Relation to Income	TBD
Real Estate and Housing	Property Values; Residential Building Permits; Rental Costs	↔
Government and Fiscal	Expenditure	↑
	Revenue	↑

Assessing the Influence of Gambling on Public Safety in Massachusetts Cities and Towns Baseline analysis of crime, call-for-service, and collision data in the communities near Encore Boston Harbor
Christopher W. Bruce (Release: MGC open public meeting, November 7, 2019, Plainville, MA)

This is the first report concerning the Everett-area agencies likely to be affected by Encore Boston Harbor. It is a baseline report, and as such, there are no particular “findings” in relation to any changes in public safety issues caused by the casino. Those will be covered in a subsequent series of reports. The most important points covered in this report are:

- Everett, Boston, Chelsea, Lynn, Malden, Melrose, Revere, and Somerville all contributed data to this report. Medford was not able to contribute data in time but hopefully will join us in future reports. Cambridge declined to participate.
- Statistics were calculated by fusing data on crimes, calls for service, and collisions extracted from each participating agency’s records management system (RMS) and computer-aided dispatch (CAD) system.
- There are means by which Encore’s presence could cause crime to increase (e.g. a larger population of visitors and vehicles providing more opportunities for offenders) and there are means by which it could decrease (e.g., by supplying more law enforcement presence, economic development, and legitimate activity in the area).
- Full statistics for crimes, calls for service, and traffic collisions are given for each participating agency from the 2012-2018 period. The data tables indicate how much the categories typically fluctuate from year to year and how the trend has been progressing over time. Despite noted errors and pitfalls within the data, it can still be effectively used to compare changes post-Encore.
- Analysis will need to consider the presence of several existing types of facilities that have seen increased traffic and usage in other communities across the nation with new casinos, including hotels, gas stations, convenience stores, transportation centers, pawnshops, and social service agencies.
- Local police agencies supply most of the actual crime data from the region, but State Police data was collected primarily to determine patterns on state roadways. Crashes have been on an upward trend (as they have for many area communities), which may be accelerated with extra traffic in the area.

Assessing the Influence of Gambling on Public Safety in Massachusetts Cities and Towns Analysis of changes in police data following eight months of activity at MGM Springfield

Christopher W. Bruce (Release: MGC open meeting, November 7, 2019, Plainville, MA)

The primary purpose of this report is to conduct an analysis of the increases and decreases in activity in the communities surrounding MGM Springfield since the casino opened, to identify which changes in activity might be attributable to the casino, and to triage trends for more detailed analysis in later reports.

Data was collected from the records management systems of the Springfield, Agawam, Chicopee, East Longmeadow, Hampden, Holyoke, Longmeadow, Ludlow, Northampton, West Springfield, and Wilbraham Police Departments and the Massachusetts State Police. Crime, calls for service, and

collisions during the period of September 2018–April 2019 were compared to the same months over the previous 5 to 7 years, depending on the data quality of the participating agency. Any significant increases were analyzed in more detail with available quantitative data. To determine likelihood of a casino relation, I used a rubric of my own design that analyzes the data for several variables: logical connection to a casino, complementary increases in other communities, complementary increases in similar crimes, evidence of increased participation from individuals outside the local area, spatial proximity to the casino, comparison to control communities, and specific mention of the casino or gambling in the police reports.

Major Findings:

- The casino itself has been the site of several hundred crimes, including violent crimes, property crimes, and police responses for other types of activity, in the eight months since it opened. As such, it has risen to the top of the local area list of hot spots and has about as much activity as a large shopping mall.
- To the extent that the casino has “caused” crime, however, it seems largely confined to the casino itself. Both the immediate block around the casino, the Metro Center of Springfield, and the surrounding residential and business community all have normal-to-low volumes, suggesting that attractors of more crime (i.e., extra people in the area) and suppressors (i.e., extra natural guardianship, extra police presence) are canceling each other out.
- The surrounding communities saw some increases and decreases but very few consistent trends to which MGM Springfield serves as a clear source. Issues most likely influenced by the casino include:
 - An increase in traffic collisions and traffic-related calls for service (disabled vehicles, abandoned vehicles, traffic complaints) on state highways and some local roads, particularly to the south and west of the casino (notably in Agawam and West Springfield).
 - An increase in other activities that tend to increase with visitors to an area, such as medical aids in Springfield and “general service” and “lost property” calls in other communities.
 - An increase in activity at Union Station in Springfield specifically. (The facility had been closed between 1973 and 2017, but crimes and calls increased even in comparison to the combined values at the previous train station and bus stations.)
 - An increase in minor disorder and suspicious activity just across the two bridges in West Springfield.
 - The surrounding communities had several joint trends for which there is no logical tie to MGM Springfield but are still worth addressing to improve public safety in the region. These include:
 - An increase in domestic violence and domestic disputes in Agawam, Ludlow, and perhaps Longmeadow.
 - Increases in pornography-related offenses in several communities. Judging by the locations of the incidents and the demographics of those involved, these seem to be a trend of “selfies” and “sexting” among local teenagers, and not anything occasioned by the casino.

- Although there is anecdotal evidence of MGM Springfield appearing among “last drink” locations during drunk driving arrests, in general drunk driving has not increased in the region as reflected either in police arrests or crash statistics. This variable is poorly recorded within regional crash data, however, and we await a more comprehensive state dataset for further analysis

Assessing the Impact of Gambling on Public Safety in Massachusetts Cities and Towns Analysis of changes in police data following four years of activity at Plainridge Park Casino

Christopher W. Bruce (Release: MGC open meeting November 7, 2019, Plainville, MA)

The primary purpose of this report is to conduct an analysis of the increases and decreases in activity in the communities surrounding Plainridge Park since the casino opened and to identify which changes in activity might be attributable to the casino. Data was collected from the records management systems of Plainville, Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham since 2010. The period of 1 July 2015 through 30 June 2019 (4 years post-casino) was compared to the same periods of previous years. Both crimes and non-crime calls for service were included. Overall crime was down in the communities, but there were significant variations across communities and across crime categories within individual communities. Any significant increases were analyzed in more detail with both quantitative and qualitative data. Rarely was there evidence to establish a casino relationship, and the general sense from the participating agencies was that they did not feel that Plainridge Park Casino had contributed significantly to crime or calls for service. Two agencies cited a heroin epidemic as more likely causing their crime increases.

Major findings:

- During Plainridge Park’s first four years of operation, the Gaming Enforcement Unit reported 5,194 “incidents” at the casino, of which 843 incidents were actual crimes. Trends include thefts of gaming credits, drug use, and distribution in the parking areas, angry and intoxicated patrons, and thefts of personal property.
- The casino directly (i.e., incidents on casino property) led to a 2% increase in violent crime (+3 incidents), a 7% increase in property crime (+44 incidents), an 9% increase in total crime (+104 incidents), and a 3% increase in calls for service (+872 incidents) for the Plainville Police Department. Crime by all measures has been declining at PPC since its first year,
- Statistics at the casino are similar to those at the top call-for-service locations in other communities.
- Based on a totality of the quantitative and qualitative evidence, the following trends in the surrounding community are “likely” to be related to the presence of Plainridge Park:
 - Increases in credit card fraud in multiple communities during the first year. (The trend abated in the second and third years.)
 - At least part of an increase in traffic collisions in the area, primarily minor collisions with no injury not reported to the state
 - An increase in traffic complaints along Route 1 south of PPC, including parts of Plainville and North Attleborough
 - Several additional disorderly conduct incidents at Plainville Commons Marketplace, across the street from the casino, in 2017

- An increase in “lost property” reports in Plainville
- An increase in “suspicious activity” reports in Plainville
- Analysis of the latest available year of statewide traffic data (2017) suggests that increases in reported collisions have simply kept track with trends that existed before PPC. Data from the agencies’ CAD systems tells a different story, but those datasets include low property-damage, non-injury crashes.
- A recent increase in drunk driving collisions plus state Alcoholic Beverage Control Commission data on “last drinks” suggests a mild increase in drunk driving in the area, likely influenced more by Patriot Place than Plainridge Park.
- Total arrests and other charges were down significantly in the area, particularly for liquor-related offenses at the major event venues. Even controlling for liquor-related offenses, arrests were down in most communities.
- No related increase was seen in state police crime statistics, excepting incidents at Plainridge Park specifically.
- Increases in domestic violence, identity theft, and fraud remain a major concern in the area, but no evidence ties these crimes directly to PPC.
- Even though burglary declined 40% in the region, Wrentham Police identified a burglary pattern whose perpetrator was principally motivated by a gambling and drug addiction, and who was known to frequent Plainridge Park.

Talking about Casino Gambling: Community Voices from Boston Chinatown

Carolyn Wong, Giles Li (Release October 24, 2019, MGC public meeting, Boston, MA)

This pilot study examined the casino gambling practices of residents and workers in Boston Chinatown. The aim was to learn about the trajectory and life context of individual participants’ gambling activity, including how individual participants describe their motivation, nature, and frequency of gambling and its effects on self and family. The research was conducted by a university-based research team in partnership with the Boston Chinatown Neighborhood Center and with the assistance of the Massachusetts Council on Compulsive Gambling. Twenty-three individuals participated in face-to-face interviews. Most participants were low-wage workers or retirees from the food and services industries in Chinatown.

The stories told by participants illustrate multiple and overlapping risk factors for problem gambling. The conceptual approach took into account the dynamic interaction of risk factors from multiple sources: stressors in participants’ daily lives rooted in socio-economic conditions, exposure to targeted marketing aimed at Chinese immigrants inside and outside the casino, casino inducements, family contexts, and individual-level psychological and/or emotional factors. Protective factors include the support of social networks or families.

Findings from this study challenge erroneous notions found in popular media and some misinformed academic writings that homogenize and reify culture by depicting Chinese as “gamblers”. Many of the interviewees described varying degrees of dependency on gambling in casinos to relieve the drudgery of

work in low-paying jobs in the food service industry, and the isolation of life in linguistically isolated neighborhoods with few alternative opportunities for recreation.

Participants expressed concern about increased risk for problem gambling with the establishment of the new Encore Boston Harbor casino. There are no culturally-appropriate prevention and treatment programs in Chinatown. Interview themes point to why there is an urgent need to fill this gap: concentrated poverty, social isolation, language and cultural difference, lack of recreational alternatives, and the longstanding practice of casino targeted advertising to Chinatown community members. The need for evidence-based and culturally appropriate prevention and treatment programs is shared by other low-income Asian American communities in Massachusetts.

Real Estate Impacts of MGM Springfield in Springfield and Surrounding Communities

Henry Renski, Thomas Peake, Andrew Hall, Denis McAuliffe, and Jonathan Astor (Release: MGC open meeting, September 26, 2019, Springfield, MA)

This report details the examination of the initial impacts of MGM Springfield on the residential, commercial, and industrial real estate markets for Springfield and its surrounding communities. It follows the [Baseline Real Estate Conditions, Host Community Profile: Springfield](#) report that documented residential, commercial, and industrial real estate trends prior to the opening of MGM Springfield. The purpose of this study is to document any notable changes to the Springfield area's real estate market following the awarding of a casino license to MGM Springfield in February 2014 and the subsequent opening of the first resort-style casino in Massachusetts in August of 2018. Since MGM Springfield has been open for less than a year at the time of writing, there are some data sources which we had hoped to use, but which do not include any post-opening data due to lags in publication.

The SEIGMA team also interviewed key informants in Springfield with a specific focus on real estate conditions and housing and concerns surrounding gentrification and displacement. The goals of the qualitative interviews are to: (1) gain an on-the-ground understanding of the social and economic conditions in host communities prior to the development of a casino, during the process of constructing a casino, and while hosting a casino, (2) utilize qualitative data of impacts to triangulate findings from quantitative data, and (3) pinpoint mechanisms to explain quantitative trends and correlations.

Key Findings: Residential Real Estate Indicators

- Sales of single-family homes in Springfield, Massachusetts flattened in the wake of the Great Recession of 2009. However, home sales picked up in 2014, just before the license was awarded to MGM and continued through 2018 when MGM Springfield opened. Since the economic recovery matched the awarding of the MGM Springfield casino license, it is difficult to truly distinguish the impact of the casino from the more general economic recovery on sales of single-family homes.
- Between 2009 and 2011, Springfield's single-family home sales saw decreasing growth rates. After 2011, Springfield's rates were below those of the surrounding communities and the rest of Hampshire and Hampden Counties. However, all three experienced steady growth after the license was awarded to MGM in 2014, although this growth could be interpreted as being due to broader market conditions.
- Between licensing and opening of MGM Springfield, condominium sales in the rest of Hampshire and Hampden Counties experienced quicker growth rates than both Springfield and its surrounding communities.

- Inflation-adjusted median sales prices in Springfield have increased slightly or remained flat for single-family homes and condominiums between the casino’s licensing and opening. Only multi-family home prices have increased dramatically during that time. Key informant interviews suggest that this phenomenon could be due to investors buying up multi-family homes.
- Median sales prices in Springfield’s surrounding communities and the rest of Hampden and Hampshire Counties experienced very little change during that time for single-family homes, condominiums, and multi-family homes.
- Median gross rents in Springfield, the surrounding communities, Hampden and Hampshire Counties, and the state as a whole increased in the period prior to and following the awarding of the MGM Springfield license. This suggests that increases in the study region could be following larger state trends.
- Springfield’s residential vacancy rate saw a 1.2% decrease in the most recent years of data following the license award while the combined surrounding communities and the rest of Hampden and Hampshire Counties saw their vacancy rates increase at rates of 0.6% and 1.5%, respectively.
- Key informants from Springfield noted the increasing pressure on the housing market and increasing rental costs. Key informants were unsure whether these trends could be attributed to the licensing and opening of MGM Springfield and teased out from larger market forces and other development projects.
- Springfield key informants raised concerns regarding the speculative buying of properties in Springfield. For instance, many of the key informants discussed investors buying multi-family buildings and raising rents and/or buying a property and leaving it vacant with the hope of selling higher. Key informants also discussed concerns regarding displacement and an increase in evictions.

Key Findings: Commercial and Industrial Real Estate Indicators

- For most of the study period (2008-2018), Springfield added new commercial space at a slightly faster rate than the Commonwealth as a whole, but lagged in terms of industrial buildings. That trend reversed at the end of 2018 with the addition of a very large industrial facility.
- Vacancy rates—or the share of rentable building area which is listed on the market—have fallen in Springfield over the last 11 years and were lower than the statewide rates at the end of 2018. It is difficult to determine how much potentially rentable building area remains off the market.
- Average lease rates for office and industrial properties were consistently much lower in Springfield and its surrounding communities than in the Commonwealth as a whole. Lease rates in Springfield and its surrounding communities were more comparable to the state for non-office commercial properties.
- The development and opening of MGM Springfield introduced a substantial amount of new commercial space to the Springfield real estate market and may have contributed to a fall in commercial vacancy rates. Otherwise, there were few obvious breaks from past trends that could plausibly be attributed to the casino.
- Springfield key informants discussed the increased patronage of downtown Springfield as a result of MGM Springfield. Key informants did note that increased foot traffic and spillover impacts onto businesses as a result of the casino are limited to businesses and restaurants adjacent to MGM Springfield.

The Construction of MGM Springfield: Spending, Employment, and Economic Impacts

Rod Motamedi, Andrew Hall, Ellen Aron, Ian Dinnie, and Jonah Swotes (Release MGC open meeting, September 26, 2019, Springfield, MA)

The UMass Donahue Institute ([UMDI](#)) is a member of the Social and Economic Impacts of Gambling in Massachusetts ([SEIGMA](#)) research team charged with carrying out aspects of the research agenda of the Massachusetts Gaming Commission (MGC). This report seeks to inform stakeholders about the construction of the MGM Springfield casino and its economic impacts in the Commonwealth. Over the course of the casino's construction, UMDI worked with the Massachusetts Gaming Commission and MGM Springfield to obtain data on the spending, employment, and wages related to the construction of MGM Springfield. These data are summarized here along with an estimate of the total economic impacts to the Commonwealth of Massachusetts resulting from the casino construction.

MGM Resorts International spent \$573.3 million to build the MGM Springfield casino. This amount differs from the larger amount that is commonly reported in the press. The larger amount represents total investment of which construction is a component. The difference between investment and construction includes design fees; furniture, fixtures, and equipment (FF&E); operating supplies and equipment (OSE); license/application fees; and pre-opening expenses.

Where were the construction dollars spent?

- Two-thirds of the construction budget (\$373.8M of \$573.3M) went to firms based in Massachusetts. Half of that (\$194.3M) (or a third of the total) remained in Hampden County.
- Nearly \$85 million went to firms based in the City of Springfield.
- Of the remaining third that went out of state (\$199.5M), about half went to firms in nearby Connecticut with the remainder spread across 16 other states and Canada.
- About one-third of the total contract value went to firms that met at least one element of the diversity criteria.

Where did construction workers reside and was it a diverse workforce?

- Over two-thirds (2,963 of 4,249) of the construction workers were Massachusetts residents. Most of the remainder were from Connecticut.
- In total, the most common place of residence was Hampden County, where 36 percent (1,524 of 4,249) of the workers resided. Of this 36 percent, 509 were Springfield residents.
- Workforce diversity statistics suggest that the MGM Springfield construction workforce largely reflected the composition of the populations from which they were drawn.
- One-quarter of Massachusetts-resident construction workers employed during the construction of MGM Springfield were minorities, which is similar to the minority share of the statewide population. Overall, the construction workers were over 90 percent male and non-veteran.
- In Springfield, the population is majority minority. Overall, the shares of White and minority MGM Springfield construction workers from Springfield were similar to their shares of the city's working age population. The largest disparity was with Black construction workers from Springfield who were significantly overrepresented compared to their share of the Springfield population.

What were the total statewide economic impacts of constructing MGM Springfield?

- Increases in company revenues and employment drive larger changes in the economy, which are estimated using an economic model.

- Overall, total statewide economic activity (also known as output) increased by \$849 million over the five-year construction period.
- Net new economic activity (i.e., value added or gross state product) totaled \$512 million.
- About 1,000 jobs were created or supported by this economic activity. These jobs accrued \$397 million of income.
- When the estimates of total economic impacts are compared to MGM Springfield's expenditures, the results show that every \$2 of construction spending created about \$1 of additional economic activity in Massachusetts and every \$1 of compensation to construction workers created an additional \$1.29 of income to others in Massachusetts.

The MA Gambling Impact Cohort: Analysis Across Three Waves

Alissa Mazar, Rachel A. Volberg, Robert J. Williams, Edward J. Stanek III, and Martha Zorn (Release MGC open meeting, September 12, 2019)

The Social and Economic Impacts of Gambling in Massachusetts ([SEIGMA](#)) research team at UMass Amherst has released a report on the first major adult cohort study of gambling conducted in the United States—the [Massachusetts Gambling Impact Cohort \(MAGIC\)](#). By surveying the same individuals over time, cohort studies provide information on how gambling and problem gambling develops, progresses, and remits. The goals of the MAGIC study are to 1) uncover and understand populations in Massachusetts who are at a higher risk of experiencing gambling harm and problem gambling and 2) inform the development of effective and efficient prevention and treatment programming in the Commonwealth.

This report specifically looks at the changes in the gambling behaviors of 3,139 Massachusetts adults from 2013/2014 (Wave 1), 2015 (Wave 2), and 2016 (Wave 3)—prior to MGM Springfield and Encore Boston Harbor opening, but after Plainridge Park Casino opened in 2015.

This is what the report found:

- Massachusetts residents gambling at out-of-state casinos significantly decreased from 2015 to 2016.
 - This suggests that the opening of Plainridge Park Casino in Plainville—and near the border of Rhode Island—in June 2015 may have been successful in ‘recapturing’ Massachusetts residents who were previously gambling at out-of-state casinos (see [Plainridge Park Casino First Year of Operation: Economic Impacts Report](#) for a detailed discussion of Plainridge Park Casino’s ‘recapture’ of Massachusetts residents’ casino spending).
- From 2015 to 2016, the problem gambling incidence rate—the proportion of people that newly experience problem gambling over a 12-month time period—was 1.2%, which is similar to other jurisdictions.
- From Wave 2 to Wave 3, the remission rate—the proportion of people who are no longer experiencing problem gambling but were experiencing this disorder 12 months prior—was 44% and slightly more individuals remitted compared with the number becoming new problem gamblers.
 - This suggests that additional treatment resources and prevention efforts may be especially beneficial in continuing the higher remission over incidence rate.
- Concerning stability—an individual’s gambling behavior remaining the same across years—Recreational Gamblers were the most stable, followed by Non-Gamblers. Those who were

experiencing problem gambling or who were engaging in gambling in ways that put them at risk of experiencing problem gambling were the least stable.

- Individuals who gambled were unlikely to transition to non-gambling across the three years.
 - Problem and At-Risk Gamblers were unlikely to transition to become Non-Gamblers.
 - This suggests that, when individuals move to less harmful gambling behaviors, they are unlikely to abstain from gambling altogether, but pursue more moderate forms of gambling.
 - These results are consistent with findings that some ‘controlled’ gambling may not be incompatible with remitting from problem gambling.
 - These findings only represent three years of data and, since gambling problems can be transitory and episodic, the UMass Amherst research team looks forward to examining how the cohort members transition in future years and whether this pattern persists.

The next MAGIC report—to be released in 2020—will examine the predictors of problem gambling across years and whether there are racial/ethnic, income, gender, and/or regional differences in these predictors. In later waves, the research team will conduct in-depth interviews with a cross-section of individuals experiencing at-risk or problem/pathological gambling who remit, do not remit, and relapse to more fully understand pathways to remission.

Gender and Gambling Behaviors: a Comprehensive Analysis of (Dis)Similarities

Danielle Venne, Alissa Mazar, and Rachel Volberg (2019), International Journal of Mental Health and Addiction, <https://doi.org/10.1007/s11469-019-00116-y> (Published on July 31, 2018)

Gambling is a gendered activity. Yet, the majority of research focuses on males and treatment seeking/clinical populations—a population that is fundamentally distinct from and ungeneralizable to non-treatment seekers. The objective of this article is to tease out the characteristics that discriminate the subtypes of gambling behavior by gender based on a representative sample of a population. In 2013–2014, 9,523 Massachusetts adults completed a survey examining their past year gambling behavior based on the Problem and Pathological Gambling Measure (PPGM). Unlike male at-risk gamblers, female at-risk gamblers are likely to play bingo and have anxiety and/or depression. Unlike female at-risk gamblers, male at-risk gamblers gamble to “feel good” about themselves. Unlike males, female problem/pathological gamblers are more likely to have a problem with drugs or alcohol in the past 12 months. Unlike females, male problem/pathological gamblers are more likely to have unhappier childhoods, gamble online, and identify as Hispanic. Demographic, health-related, and gambling-related discriminators are largely the same for female and male gambling subtype behaviors. There are, however, a few defining characteristics that differentiate females and males in terms of the likelihood of experiencing problematic gambling behavior.

Significant Research Activities, July 2019 – January 2020

Data Storage and Sharing Project

In December 2019, the MGC entered into an ISA agreement with MDPH to host several datasets produced from MGC research activities. Initial datasets include Baseline General Population Survey (BGPS), Baseline Online Panel (BOPS), Targeted Population Surveys, Plainville Patron Survey, MA Gaming Impact Cohort (MAGIC) datasets and codebooks.

In January, the MGC will launch a new research webpage that includes an application for researchers to access the datasets for research purposes. Over time the number of datasets is expected to grow and include player card data from casino licensees (Sect.97)

New Employee Survey: Encore Boston Harbor, MGM Springfield, and Plainridge Park Casino
UMass Amherst research team

A critical component of the SEIGMA research involves estimating the effects of new casino employees on the local labor force by identifying industries and occupations that may experience vacancies as employees take jobs at the new casinos; measuring new job creation by counting those who were previously unemployed or underemployed or moved from out of state; and analyzing whether and how casino jobs improve the livelihoods of local employees through their wages and benefits and opportunities for career advancement and training.

To achieve these goals, the SEIGMA team assists the MGC in the development of a survey questionnaire. The MGC administers the survey to new employees during the completion of the I-9 process. The questionnaire is administered online on tablet computers and collects several key pieces of data from each applicant to help the MGC and the SEIGMA team understand the impacts of casinos on the Commonwealth's workforce.

The survey collects the following types of information about employees:

- Previous work at a casino (if applicable)
- Massachusetts Gaming Commission temporary identification numbers (for occupations legally required to have a valid state gaming license) or casino-specific employee identification numbers (for occupations that do not require gaming licenses)
- Previous and current work status (i.e., full-time or part-time status)
- Previous industry of work
- Previous and current occupation
- Previous and current annual salaries/wages
- Previous and current benefits received (if applicable)
- Reasons for seeking a job at the casino
- City/town, state, and zip codes of current residence
- City/town, state, and zip codes of origin and destination if moving
- Educational attainment
- Receipt of pre-employment casino-related training and the organization that provided the training (if applicable)
- Interest in a casino-related career and in different types of training
- Demographic information such as age, gender, race/ethnicity, citizenship status, and veteran status

Casino Operations Data Collection, MGM Springfield
UMass Amherst research team

It is vital that MA casino operators report key information about their business operations and practices to enable the monitoring of these operations and practices. Such information will also be critical in assessing the economic impacts of expanded gambling in Massachusetts. Data requests will be communicated directly to data providers named by the individual operator. Examples of data which will be requested include:

- Non-gaming revenue by type (e.g., hotel, restaurant, retail, etc).
- Employment, wages, and business type data for casino tenants and on-site vendors
- For each casino employee: e.g., gaming license number, employee identification number, start date, termination date (if applicable), category/department, hours worked, total wages and salaries, benefits and fringe, and ZIP code of residence
- We also anticipate working with each casino operator to develop a method to estimate tips earnings.
- For each vendor/supplier: Amount spent on goods/services, North American Industrial Classification System (NAICS) code, and ZIP code
- All other spending by recipient: Amount by category, e.g., taxes, fees, licensing payments, host community agreement payments, other payments to host communities for infrastructure and public services, payments towards community mitigation funds, etc.
- Spending (or value) of player incentives
- Example templates for employee and vendor data will be made available to operators
- Note – Gross gaming revenue totals are currently provided to SEIGMA by the MGC

Encore Boston Harbor Construction Data Collection

UMass Amherst research team

Over the course of Encore Boston Harbor's casino construction, the SEIGMA research team worked with the Massachusetts Gaming Commission and Encore Boston Harbor to obtain data on the spending, employment, and wages related to the construction of Encore Boston Harbor. These data will be used to estimate the total economic impacts of Encore's construction to the Commonwealth of Massachusetts. A report detailing the results is expected in July 2020.

Examples of data requested include:

- For each worker: Hours worked, total wages and salaries, benefits and fringe, and ZIP code of residence (the research team will discuss options for aggregating the data should this level of detail be impractical).
- For each vendor/supplier: Amount spent, North American Industrial Classification System (NAICS) code, and ZIP code
- Spending on new infrastructure or improvements to infrastructure serving the facility (roads; water/sewer, etc.)
- Party with primary responsibility for maintaining the infrastructure post-construction (e.g., will this be contracted out, to whom, under what terms?)
- All other spending by recipient: Amount by category, e.g., taxes, fees, licensing payments, host community agreement payments, other payments to communities for infrastructure and public services, etc.
- Example templates for employee and vendor data will be made available to operators

Follow-Up Springfield Targeted Population Survey

UMass Amherst research team

The purpose of this survey is to understand the social and health impacts of opening MGM Springfield in Springfield and the surrounding communities. The survey will be based on a random selection of 1,000 adults in Springfield and its surrounding communities with a 100 percent over selection of those who

identify as Black, Hispanic, or Asian. Address-based sampling will be utilized, and the surveys will be administered by NORC at the University of Chicago. The Follow-Up Springfield Targeted Population Survey will ensure a sufficient sample size in the local region to identify localized community-specific impacts that can be compared to the Baseline Springfield Targeted Population Survey. Data collection will begin at the end of September 2019 and will be completed in January 2020. A report detailing the results is expected at the end of June 2020.

MGM Springfield Patron Survey Data Collection, completed

UMass Amherst research team

The Patron Survey is an essential component of the economic analysis that will clarify patron origin and expenditure. The Patron Survey will also inform analyses of the social impacts of the introduction of casino gambling in Massachusetts. On a team consisting of over 15 surveyors, 1 of every 6 persons exiting MGM Springfield were asked to participate in a 5-7 minute survey concerning their experience at MGM Springfield that day. Dates of the first Wave (winter) of survey data collection were: Saturday, February 23, 2019: 11-5pm; Monday, February 25, 2019: 6-12am; Saturday, March 2, 2019: 11-5pm; and Monday, March 4, 2019: 6-12am. Dates of the second Wave (summer) of survey data collection were: Saturday, July 27, 2019: 11-5pm; Monday, July 29, 2019: 6-12am; Saturday, August 3, 2019: 6-12am; Monday, August 5, 2019: 11-5pm. In total, 880 surveys were collected. A report detailing the results will be released in March 2020.

Massachusetts Gambling Impact Cohort (MAGIC) data collection, Wave 5, completed

UMass Amherst research team

While robust in many regards, the SEIGMA methodology provides population-based 'snap shots' of the dynamic process of behavior change during a time of gambling expansion. The cross-sectional design of the SEIGMA project is in contrast to the Massachusetts Gambling Impact Cohort (MAGIC) study design that follows 3,139 Massachusetts adults with a shared experience (exposure to expanded gambling) at intervals over time. From a prevention standpoint, knowing how and where to effectively intervene hinges on having research that clearly identifies the variables that are etiologically involved in problem gambling, their temporal sequence, and their causal connections. MAGIC provides the etiological information necessary to understand how gambling and problem gambling develops, progresses, and remits over time. MAGIC has significant value as it will highlight risk and protective factors important in developing effective prevention, intervention, treatment, and recovery support services. The 5th Wave of data collection from the MA cohort was completed at the end of July 2019. The National Opinion Research Center (NORC) delivered the 5th Wave of data to the UMass Amherst research team in January 2020. A report detailing the longitudinal predictors of developing and remitting from problem gambling will be published in November 2020.

Forthcoming Reports and Studies

Massachusetts Gambling Impact Cohort (MAGIC)

- Five waves of data have been collected from a cohort of 3,139 adult Massachusetts residents. The study includes an over-sample of at-risk and problem gamblers drawn from the SEIGMA baseline population survey. A summative and final report will be published in November 2020.
- **Low-Risk Gambling Guidelines for MA**

- The report will focus on the operationalization of gambling harm based on the cohort study.
STATUS: March 1, 2020
- **MAGIC, Transitions across Waves 1-4**
 - Assesses Wave 4 data collection and changes across the four waves in terms of (1) gambling participation, (2) incidence of problem gambling, and (3) transitions within the cohort.
 - **STATUS:** March 31, 2020
- **Longitudinal Predictors of Problem Gambling Across Waves**
 - Analyses will focus on predictors of problem gambling onset and whether there are racial/ethnic, income, gender, and/or regional differences in these predictors across five waves of data.
 - Examine predictors of problem gambling remission and the extent to which accessing treatment is one of these factors.
STATUS: November 30, 2020

Social and Economic Impacts of Gambling in Massachusetts (SEIGMA)

- **Further Analyses of BGPS Data**
 - Preparation and submission of publishable manuscripts based on (1) deeper analyses of the BGPS (published—*BMC Public Health*), (2) analysis of differences in predictors of problem gambling by gender (published—*International Journal of Mental Health and Addiction*), (3) risk of harm based on analysis of associations between problem gambling and specific forms of gambling (submitted to *BMC Public Health* in December 2019), and (4) veterans and problem gambling (published—*Journal of Gambling Studies*).
STATUS: Risk of harm manuscript was submitted in December 2019 to *BMC Public Health* and is awaiting peer review.
- **Gambling Harms in Massachusetts Report**
 - Prepare and publish report on deeper analyses of BGPS and BOPS examining gambling harms in Massachusetts.
STATUS: March 31, 2020
- **Springfield Key Informant Interviews**
 - Gain an on-the-ground understanding of conditions in host communities.
 - These interviews will specifically focus on the public health impacts of MGM Springfield in the Springfield community.
STATUS: April 30, 2020
- **MGM Springfield Patron & License Plate Survey report (w/ fact sheet)**
 - Clarifies patron origin and expenditure and informs analyses of the social and economic impacts of the introduction of casino gambling in Massachusetts.
STATUS: March 31, 2020
- **Academic publication: Treatment seeking among MA problem gamblers (w/ fact sheet)**

- Assesses the determinants of wanting and/or seeking help for a gambling problem in the Massachusetts population.
STATUS: February 28, 2020
- **Springfield Lottery Report (w/ fact sheet)**
 - Assesses the impact of MGM Springfield on lottery sales statewide, in the host and surrounding communities, and for agents at different driving distances from the casino.
STATUS: Under RRC review. Release tentatively scheduled for February 13, 2020.
- **MGM New Employee Survey**
 - Assesses whether and how casino jobs improve the livelihoods of local employees through their wages and benefits and opportunities for career advancement and training.
STATUS: March 31, 2020
- **MGM Operations Report**
 - Assessing the economic impacts of expanded gambling in Massachusetts at the state and host and surrounding community level.
STATUS: April 30, 2020
- **Encore Construction Report**
 - Estimates the total economic impacts of Encore's construction to the Commonwealth of Massachusetts.
STATUS: July 31, 2020

Springfield Youth Health Survey

- To better understand gambling behavior and risk in youth, the MGC provided funding to the Public Health Institute of Western MA to extend questions on the 2019 survey.
STATUS: The survey was administered in Springfield Public Schools in February 2019. The report is under review.

Public Safety

- **Everett and Surrounding Communities:** Six-Month Analysis of Crime, Call-for-Service, and Collision data in the Communities near Encore Boston Harbor.
STATUS: The final report is anticipated April 9, 2020
- **Springfield and Surrounding Communities:** One-year Analysis of Crime, Call-for-Service, and Collision data in the Communities near MGM Springfield.
STATUS: The one-year report to be released February 27, 2020

Community Engaged Research

- The objective of Community Engaged Research is to more deeply understand and address the impact of the introduction of casino gambling in Massachusetts's communities. This type of

work emphasizes the collaboration between researchers and community partners who translate findings to key stakeholders.

- **Massachusetts Council on Compulsive Gambling and the University of Massachusetts Gerontology Institute**
 - Through stakeholder engagement and community-based participatory research, the partnership proposes to develop a senior profile about gambling, problem gambling, and ancillary issues among seniors. These profiles will be broken out by community, demographics, and socio-economic status to provide evidence-based support to help the Councils on Aging (COA) with responsible gambling programs and services.
Status: Lead investigators will provide an update during the Gaming Research Advisory Committee (GRAC) meeting on January 24, 2020. The final report is expected June 2020.

- **JSI Research and Training Institute, Inc.**

The overarching purpose of this study is to understand the ways in which casino gambling influences the life contexts of Hispanic/Latino residents in the Greater Springfield Area. Emphasis will be placed on uncovering how the historical and socio-cultural contexts shaping the life experiences of this population influence their beliefs and behaviors related to casino gambling. We will adopt a rigorous community-based participatory research approach (CBPR) to enhance the existing knowledge base on the impacts of gambling (including the Social and Economic Impacts of Gambling in Massachusetts study (SEIGMA)) on marginalized populations.
Status: Lead investigators will provide an update during the Gaming Research Advisory Committee (GRAC) meeting on January 24, 2020. The final report is expected June 2020.

- **Boston Chinatown Neighborhood Association**
 - The proposed Asian CARES (Center for Addressing Research, Education, and Services) project is a community-engaged research (CER) partnership committed to addressing problem gambling among Asian ethnic communities through research, community education, and culturally-relevant service provision. For this seed proposal, we will conduct preliminary research to expand our understanding of how problem gambling manifests in Asian families and inform the development of tools and community-based resources for prevention and early intervention efforts.
Status: Lead investigators will provide an update during the Gaming Research Advisory Committee (GRAC) meeting on January 24, 2020. The final report is expected June 2020.

Reports & Studies to date, 2014 – January 2020

Reports and publications listed in this section are available at: <https://massgaming.com/about/research-agenda/>

Social & Economic

- Social and Economic Impacts of Plainridge Park Casino: 2018. (November 7, 2019)

- Social and Economic Impacts of Expanded Gambling in Massachusetts: 2018. (December 6, 2018)
- Patron and License Plate Survey Report: Plainridge Park Casino 2016 (October 13, 2017)

Social

- The MA Gambling Impact Cohort: Analysis Across Three Waves. (September 12, 2019)
- Impacts of Gambling in Massachusetts: Results of a Baseline Online Panel Survey (BOPS). (January 10, 2017)
- Analysis of the Massachusetts Gambling Impact Cohort (MAGIC) Wave 2: Incidence and Transitions. (December 22, 2017)
- Gambling and Problem Gambling in Massachusetts: In-Depth Analysis of Predictors. (March 23, 2017)
- Gambling and Problem Gambling in Massachusetts: Results of a Baseline Population Survey. (September 15, 2017)
- Key Findings from SEIGMA Research Activities: Potential Implications for Strategic Planners of Problem Gambling Prevention and Treatment Services in Massachusetts. (December 18, 2015)

Population Specific Research

- Talking about Casino Gambling: Community Voices from Boston Chinatown (October 24, 2019)
- Casinos and Gambling in Massachusetts: African-American Perspectives. (October 26, 2018)
- Screening for Gambling Disorder in VA Primary Care Behavioral Health: A pilot study (October 26, 2018)

Publications

- Venne, D., Mazar, A., & Volberg, R. (2019). Gender and Gambling Behaviors: a Comprehensive Analysis of (Dis)Similarities. *International Journal of Mental Health and Addiction*.
- Freeman, J., Volberg, R., & Zorn, M. (2019). Correlates of At-Risk and Problem Gambling Among Veterans in Massachusetts. *Journal of Gambling Studies*.
- Brand, E., Rodriguez-Monguio, R., & Volberg, R. (2018). Gender Differences in Mental Health and Substance Use Disorders and Related Healthcare Services Utilization. *The American Journal on Addictions*.
- Mazar, A., Williams, R. J., Stanek, E. J., Zorn, M., & Volberg, R. A. (2018). The Importance of Friends and Family to Recreational Gambling, At-risk Gambling, and Problem Gambling. *BMC Public Health*.
- Rodriguez-Monguio, R., Brand, E., & Volberg, R. (2017). The Economic Burden of Pathological Gambling and Co-occurring Mental Health and Substance Use Disorders. *Journal of Addiction Medicine*.
- Rodriguez-Monguio, R., Errea, M., & Volberg, R. (2017). Comorbid Pathological Gambling, Mental Health, and Substance Use Disorders: Health-Care Services Provision by Clinician Specialty. *Journal of Behavioral Addictions*.
- Okunna, N. C., Rodriguez-Monguio, R., Smelson, D. A., Poudel, K. C., & Volberg, R. (2016). Gambling Involvement Indicative of Underlying Behavioral and Mental Health Disorders. *The American Journal on Addictions*.
- Okunna, N. C., Rodriguez-Monguio, R., Smelson, D. A., & Volberg, R. A. (2015). An Evaluation of Substance Abuse, Mental Health Disorders, and Gambling Correlations: An Opportunity for Early Public Health Interventions. *International Journal of Mental Health and Addiction*.

Economic

- Economic Impacts of Plainridge Park Casino: Four Years of Operations. (November 7, 2019)
- New Employee Survey at Plainridge Park Casino: Analysis of Fiscal Year 2018. (November 7, 2019)
- Social and Economic Impacts of Plainridge Park Casino: 2018 (November 7, 2019)
- Real Estate Impacts of MGM Springfield in Springfield and Surrounding Communities. (September 26, 2019)
- The Construction of MGM Springfield: Spending, Employment, and Economic Impacts. (September 26, 2019)
- Real Estate Impacts of the Plainridge Park Casino on Plainville and Surrounding Communities. (October 11, 2018)
- Lottery Revenue and Plainridge Park Casino: Analysis After Two Years of Casino Operation. (May 10, 2018)
- Plainridge Park Casino First year of Operations: Economic Impacts Report. (October 6, 2017)
- New Employee Survey at Plainridge Park Casino: Analysis of the First Two Years of Data Collection. (May 10, 2017)
- Lottery Revenue and Plainridge Park Casino: Analysis of the First Year of Casino Operation. (January 19, 2017)
- Real Estate Profiles of Host Communities. (August 30, 2016)
- The Construction of Plainridge Park Casino: Spending, Employment, and Economic Impacts. (September 19, 2016)
- Economic Profiles of Host Communities. (October 20, 2015)
- Measuring the Economic Effects of Casinos on Local Areas: Applying a Community Comparison Matching Method. (November 5, 2014)

Public Safety

Springfield: Assessing the Impact of Gambling on Public Safety Massachusetts Cities and Towns

- Analysis of Changes in Police Data following Eight Months of Activity at MGM Springfield. (November 7, 2019)
- Analysis of Changes in Police Data following Four Months of Activity at MGM Springfield. (May 19, 2019)
- Baseline Analysis of Crime, Call-for-Service, and Collision data in the Communities near MGM Springfield. (October 25, 2018)

Plainville: Assessing the Impact of Gambling on Public Safety Massachusetts Cities and Towns

- Analysis of Changes in Police Data After Four Years of Operation at Plainridge Park Casino. (November 7, 2019)
- Analysis of Change in Police Data After Two Years of Operation at Plainridge Park Casino. (March 1, 2018)
- Analysis of Changes in Police Data After the First Year of Operation at Plainridge Park Casino. (December 12, 2016)
- Analysis of Changes in Police Data After the First Six Months of Operation at Plainridge Park Casino. (April 12, 2016)

- Baseline Analysis of Crime, Call-for-Service, and Collision Data in the Plainville Region. (August 24, 2015)

Everett: Assessing the Impact of Gambling on Public Safety Massachusetts Cities and Towns

- Baseline Analysis of Crime, Call-for-Service, and Collision Data in the Everett Region. (November 7, 2019)

Program Evaluation

- Assessing the Massachusetts Gaming Commission PlayMyWay Play Management System. (January, 2019)
- Evaluation of the Massachusetts Voluntary Self-Exclusion Program: June 24, 2015 – November 30, 2017. (September 27, 2018)
- Comprehensive Evaluation of the Plainridge Park Casino GameSense Program: 2015-2018 Compendium (July 26, 2018)
- Preliminary Study of Patrons' Use of the Play My Way Play Management System at Plainridge Park Casino: June 8, 2016 – January 31, 2017 (October 2017)
- Summary Analysis of the Plainridge Park Casino GameSense Program Activities & Visitor Survey: December 1, 2015 – May 31, 2016, (July 2016)

Data Presentation

- SEIGMA-MAGIC Fact Sheets. (November 7, 2019 and December 6, 2018)
- MASS-AT-A-GLANCE: An interactive app of social and economic trends in MA communities. (May 10, 2018)

research snapshot

summarize | mobilize



Factors associated with at-risk and problem gambling among U.S. veterans

What this research is about

Problem gambling is defined as repetitive gambling behaviour that leads to negative consequences. Problem gambling is a common issue among military veterans. Other mental health problems that are linked to problem gambling are also common among veterans. These include depression, anxiety, post traumatic stress disorder (PTSD) and substance abuse.

There have been few studies examining problem gambling among veterans, and most of these studies used information from Veterans Affairs (VA) in the USA. However, this information misses veterans who are not enrolled in VA healthcare. The current study examined problem gambling among non-VA veterans. It studied factors associated with problem gambling among veterans in a general population sample.

What the researchers did

The researchers used data from the Baseline General Population Survey (BGPS). The survey collected data from September 11, 2013 to May 31, 2014. Participants of the BGPS were 9,578 adults living in Massachusetts, USA.

The BGPS captured gambling attitudes, gambling behaviour, and gambling-related problems. The BGPS assessed gambling-related problems using the Problem and Pathological Gambling Measure (PPGM). Based on their answers to the PPGM, participants were grouped as non-gambling, recreational gambling, and at-risk or problem gambling (had one or more symptoms of problem gambling).

The BGPS asked participants for their sociodemographic information (age, race/ethnicity, gender, education, etc.). It asked for their military

What you need to know

This study examined problem gambling among U.S. veterans who were not recruited through Veterans Affairs. The researchers examined survey data from 9,578 adults living in Massachusetts, USA. There were 126 participants with problem gambling. Nearly one-fifth of those participants were veterans. The researchers compared veteran recreational gamblers to veterans with at-risk/problem gambling. Gambling in more activities and having friends and family involved in gambling raised the odds of at-risk/problem gambling among veterans who gambled. Purchase of raffle tickets in the past year lowered the odds of at-risk/problem gambling among the veterans. These findings may be useful in developing treatment for veterans with gambling problems.

status. The BGPS also asked about playing extreme sports, health status, level of stress, tobacco use, alcohol use, binge drinking, drug use, mental health, childhood happiness, and family and friend involvement in gambling.

In this study, the researchers focused on participants with veteran status. They analyzed differences between veteran non-gamblers and veteran gamblers (recreational, at-risk and problem gambling). They also compared veteran recreational gamblers and veterans with at-risk/problem gambling. Finally, the researchers examined factors associated with at-risk and problem gambling among veterans.

What the researchers found

Among the 9,578 BGPS participants, 923 participants (9.6%) were veterans and 129 participants (1.3%) had problem gambling. Of those participants with problem gambling, 126 reported their military status and 26 were veterans. Thus, approximately one-fifth of participants with problem gambling were veterans. This is a higher percentage than previously reported with VA veterans. Another 93 veterans had at-risk gambling.

Compared to veteran gamblers (recreational, at-risk and problem), non-gambling veterans were more likely to binge drink and less likely to have friends and family involved in gambling.

There were few differences between veterans with at-risk gambling and veterans with problem gambling. Thus, the two groups were combined into one group to compare to veteran recreational gamblers. Veteran recreational gamblers and veterans with at-risk/problem gambling differed on education, family and friend involvement in gambling, and involvement in different types of gambling. Veterans with at-risk/problem gambling played more types of gambling than veteran recreational gamblers. They were also more likely to have friends and family involved in gambling. Veterans with at-risk/problem gambling were less likely to purchase raffle tickets in the past year than veteran recreational gamblers. This could be because buying raffle tickets is likely for supporting a charity cause, rather than for winning money.

How you can use this research

This study could be useful to treatment providers working with veterans. Treatment providers could design treatments that address multiple gambling activities and involvement of friends and family in gambling. Future research could examine the changes in problem gambling among veterans over time. It could also study other factors of problem gambling that may be unique to veterans.

About the researchers

Joshua R. Freeman, Rachel A. Volberg and Martha Zorn are affiliated with the Department of Biostatistics and Epidemiology at the University of Massachusetts in Amherst, Massachusetts, USA. For more information about this study, please contact Joshua R. Freeman at jrfreeman@umass.edu.

Citation

Freeman, J. R., Volberg, R. A., & Zorn, M. (2019). Correlates of at-risk and problem gambling among veterans in Massachusetts. *Journal of Gambling Studies*. Advance online publication.

<https://doi.org/10.1007/s10899-018-9814-7>

Study funding

This study was funded by Massachusetts Gaming Commission (Grant No. ISA MGC10500003UMS15A).

Gambling Research Exchange Ontario (GREO)

Gambling Research Exchange Ontario (GREO) has partnered with the Knowledge Mobilization Unit at York University to produce Research Snapshots. GREO is an independent knowledge translation and exchange organization that aims to eliminate harm from gambling. Our goal is to support evidence-informed decision making in responsible gambling policies, standards and practices. The work we do is intended for researchers, policy makers, gambling regulators and operators, and treatment and prevention service providers.

Learn more about GREO by visiting greo.ca or emailing info@greo.ca.



research snapshot

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Gender differences in healthcare use for mental health and substance use disorders

What this research is about

Problem gambling is defined as repetitive gambling behaviour that leads to negative consequences. Pathological gambling is a clinical diagnosis of severe problem gambling. It is more common among men than women. Pathological gambling often co-occurs with a range of other mental disorders. These include alcohol and substance use disorders, mood and anxiety disorders, and impulse control disorders.

Co-occurring mental disorders are more common among women with pathological gambling than men with pathological gambling. Women are also more likely than men to seek treatment and use healthcare services for mental disorders. However, women seek treatment for pathological gambling less often than men.

There is little research about whether there are differences in treatment-seeking and healthcare use between men and women with clinician diagnosed pathological gambling and co-occurring mental health and substance use disorders. The current study fills this research gap.

What the researchers did

The researchers used healthcare claims data from the Massachusetts All Payer Claims Database. The data covered claims from January 1, 2009 to June 30, 2013 for healthcare services provided by the 16 largest private commercial payers in Massachusetts, USA. The researchers examined data from 591 adult patients with pathological gambling. Their diagnosis was based on the International Classification of Diseases, 9th Revision, Clinical Modification (ICD-9-CM). Diagnoses of co-occurring mental health and substance use disorders were also based on the ICD-9-CM.

What you need to know

The researchers examined healthcare claims data from 591 adult patients with pathological gambling. Over two-thirds of patients were male. Most patients had pathological gambling as their principal diagnosis. Slightly more women than men had a principal diagnosis of pathological gambling. More women than men had co-occurring mental health disorders, except for alcohol use disorders. Men were more likely than women to have an alcohol use disorder. Also, more women than men seeking treatment for pathological gambling had three or more co-occurring conditions. Women also had more episodes of care for those disorders than men. This study shows that gender-specific strategies are needed to address differences in mental health and substance use disorders and related healthcare needs.

The healthcare claims data also included patient age, gender, zip code, and dates and type of health care service provided, provider random identifiers and provider zip code. The researchers added up each patient's total number of mental health and substance use disorders. They grouped the number of diagnoses into three groups: 1-2 diagnoses, 3-4 diagnoses, and 5 or more diagnoses.

The researchers also used each patient's principal diagnosis to classify each episode of care into mental health or substance use disorder.

The researchers analyzed co-occurring mental health and substance use disorders for patients who had a principal diagnosis of pathological gambling by gender. The researchers also analyzed differences in

health care use for mental health and substance use disorders by gender.

What the researchers found

Among the 591 patients diagnosed with pathological gambling, over two-thirds (68.4%) were men. Women seeking care for pathological gambling and co-occurring disorders were older than men.

Slightly more women (83.4%) than men (80.2%) seeking treatment had pathological gambling as their principal diagnosis. Having pathological gambling as the principal or primary diagnosis was associated with a greater use of healthcare services.

More women than men had a co-occurring depressive or mood disorder. More men than women had a co-occurring alcohol use disorder. Also, more women than men had 3 or more co-occurring disorders; whereas, more men than women had 1-2 co-occurring disorders.

Women seeking treatment for pathological gambling and co-occurring disorders used more health care services than men. On average, women had more episodes of care related with mood disorders and neurotic disorders, including anxiety disorders, than men. There was no difference in the number of episodes of care for substance use between men and women.

Having a diagnosis of a mood or neurotic disorder (e.g., anxiety disorder) increased the use of health care for both genders. Having a diagnosis of a substance use disorder increased the use of health care in men compared to men without the diagnosis. This was not found in women.

How you can use this research

The findings suggest that different screening and treatment strategies to reduce prevalence of pathological gambling are needed for each gender. For instance, clinicians could screen for and treat alcohol use disorder among men with pathological gambling. For females with pathological gambling, clinicians could screen for mood and neurotic

disorders. Patients, especially females, might also present with multiple co-occurring disorders.

About the researchers

Evelyn Brand is affiliated with Mathematica Policy Research in Ann Arbor, Michigan, USA. **Rosa Rodriguez-Monguio** is affiliated with the School of Pharmacy and the Medication Outcomes Centre at the University of California San Francisco in San Francisco, California, USA. **Rachel Volberg** is affiliated with the School of Public Health and Health Sciences at the University of Massachusetts in Amherst, Massachusetts, USA. For more information about this study, please contact **Rosa Rodriguez-Monguio** at Rosa Rodriguez-Monguio@ucsf.edu.

Citation

Brand, E., Rodriguez-Monguio, R., & Volberg, R. (2019). Gender differences in mental health and substance use disorders and related healthcare services utilization. *The American Journal on Addictions*, 28(1), 9-15.

<https://doi.org/10.1111/ajad.12826>

Study funding

This research was partly funded by the Massachusetts Gaming Commission in Boston, MA.

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research snapshot

summarize | mobilize



Gamblers with a lower portion of friends and family who gamble may have a lower risk of developing gambling problems

What this research is about

There are different types of gamblers. Recreational gamblers gamble for fun. At-risk gamblers have had negative experiences from gambling. Problem or pathological gamblers gamble repeatedly and this leads to negative consequences. Non-gamblers don't gamble at all. Many studies focus on understanding the characteristics of problem gamblers. Few studies examine the different characteristics of the other types of gamblers. It is important to understand how gamblers are different from each other to create effective prevention programs that protect gamblers from harm.

Research shows that there are similarities and differences between the different types of gamblers. These similarities and differences can be based on gender, ethnic group, age, amount of education they have, if they're married or not, how much money they make, if their family or friends gamble, and if they use drugs or alcohol. For example, non-gamblers tend to be female with more education. At-risk gamblers tend to be males with less education.

In this study, the researchers investigated the characteristics that make recreational gamblers different from non-gamblers, at-risk gamblers, and problem or pathological gamblers.

What the researchers did

The researchers used data collected from the Baseline General Population Survey (BGPS) of Massachusetts. NORC at the University of Chicago obtained a representative sample of 9,578 Massachusetts adults who completed the BGPS online, on paper, or in a telephone interview. The BGPS asked participants about their recreation, physical, and mental health behaviours, alcohol and drug use, attitudes toward

What you need to know

This study investigated how recreational gamblers differ from non-gamblers, at-risk gamblers, and problem or pathological gamblers. The researchers used data collected with the Baseline General Population Survey (BGPS). The survey was administered to adults in Massachusetts. The researchers utilized the Problem and Pathological Gambling Measure (PPGM) to identify different gambler types. Males, immigrants, gamblers with less education, and lower income had a higher risk of developing gambling problems. Gamblers who had a lower portion of friends and family who gamble had a lower risk of developing gambling problems. Different forms of gambling games contribute differently in causing problems for gamblers. Prevention service providers can use this research to create programs that consider the effect a gambler's social network may have on their gambling behaviour.

gambling, gambling participation, gambling motivations, awareness of problem gambling services, gambling-related problems, and demographics.

Participants who reported gambling once a month or more were asked to complete the Problem and Pathological Gambling Measure (PPGM). The PPGM assessed participants for problem gambling symptoms. The researchers used the results of the PPGM to sort participants into four different gambler types. These types were non-gamblers, recreational gamblers, at-risk gamblers, and problem and pathological gamblers. They identified respondents as non-gamblers if they didn't gamble at all in the past year. Recreational gamblers gambled in the past year

but did not have any problem gambling symptoms. At-risk gamblers reported gambling more often and losing more money than what the median problem and pathological gambler reported. Problem gamblers reported gambling at least once a month and scored high on the PPGM. Pathological gamblers reported gambling at least once a month and scored higher than problem gamblers on the PPGM.

What the researchers found

Compared to recreational gamblers, non-gamblers had a lower portion of friends and family who were gamblers. Recreational gamblers and non-gamblers had similar characteristics otherwise. Compared to recreational gamblers, at-risk gamblers were more likely to be male, born outside the United States, have less education, and make less money. They were also more likely to have mental health problems and not drink alcohol. The second strongest predictor of being an at-risk gambler was having a higher portion of friends and family who gamble.

The researchers found the most differences between recreational gamblers and problem and pathological gamblers. Compared to recreational gamblers, problem and pathological gamblers tended to be Black, male, have less education, and be born outside of the United States. Like at-risk gamblers, the second strongest predictor of being a problem or pathological gambler was having a higher portion of friends and family who gamble.

At-risk gamblers were more likely than recreational gamblers to gamble at casinos. This finding makes sense, since research shows that casino games, such as slot machines and casino table games, encourage gamblers to play non-stop. Playing non-stop may increase gamblers' risk of developing gambling problems. Overall, at-risk and problem and pathological gamblers play many different types of gambling games. All types of gambling games can play a part in causing problems for gamblers, although they possess different risk profiles.

How you can use this research

Prevention service providers can use this research to create prevention programs that consider the effect a gambler's social network may have on their gambling

behaviour. They could also use this research to develop programs for groups that are more likely to develop gambling problems such as men, people who immigrated to the United States, and people who have less education.

About the researchers

Alissa Mazar, Edward J. Stanek III, Martha Zorn, and Rachel A. Volberg are affiliated with the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) project, at the University of Massachusetts Amherst School of Public Health and Health Sciences in Massachusetts, United States. **Robert J. Williams** is affiliated with the SEIGMA project and with the Faculty of Health Sciences at the University of Lethbridge in Alberta, Canada. For more information about this study, please contact Alissa Mazar at amazar@umass.edu.

Citation

Mazar, A., Williams, R.J., Stanek III, E.J., Zorn, M., & Volberg, R. (2018). The importance of friends and family to recreational gambling, at-risk gambling, and problem gambling. *BMC Public Health*, 18. <https://doi.org/10.1186/s12889-018-5988-2>

Study Funding

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Who is most likely to treat pathological gamblers?

What this research is about

People with pathological gambling (PG) often have other mental health disorders. For instance, bipolar disorders, depression, personality disorders, and anxiety are very common among people with PG. Substance use disorders are also quite common. These include alcohol abuse, tobacco use disorder, and prescription drug abuse. There is little research on the type of health care services received by people for their gambling problems and co-occurring disorders.

The current study assessed the characteristics of patients seeking treatment for PG and co-occurring mental health and substance use disorders in the US context. It also estimated the likelihood of patients receiving care by clinician specialty. That is, it estimated how likely it was for patients to receive care from primary care physicians (PCPs), social workers, psychologists, and psychiatrists.

What the researchers did

The researchers used data from the Massachusetts All-Payer Claims Database (APCD). The APCD represents health claims from public and private health insurance payers in Massachusetts (MA). The APCD includes information on health care services including physician visits, emergency department visits and hospitalizations, and prescription drugs.

The researchers examined data for 869 MA residents with a diagnosis of PG who sought treatment at some time during January 2009 to June 2013. The APCD provided information on these patients' co-occurring mental health and substance use disorders. It also provided information on who treated these patients.

What you need to know

This study examined health care services received by patients seeking treatment for pathological gambling (PG) and co-occurring disorders. All of the 869 patients were residents of Massachusetts, USA. They were covered by private insurance payers, with many being enrolled in a health maintenance organization (HMO). The likelihood of receiving care by clinician specialty varied significantly by patients' diagnosis and number of co-occurring disorders. If PG was the principal diagnosis, then patients were more likely to receive care from social workers and psychologists compared to primary care providers (PCPs) and psychiatrists. PG patients with co-occurring depression were three times more likely to receive care from PCPs. PG patients with three or more co-occurring diagnoses were more likely to receive care from PCPs. They were less likely to receive care from psychologists and social workers.

The researchers analyzed the number of co-occurring mental health and substance use disorders each patient had. Then, they grouped the patients by the number of co-occurring disorders (i.e., one, two, three, and four or more diagnoses).

The researchers also examined who treated these patients. Clinicians could be therapeutic providers, such as social workers or psychologists who cannot prescribe medications. Clinicians could also be prescribing providers, such as psychiatrists and PCPs. The researchers estimated the likelihood of receiving care by clinician specialty based on the specific co-occurring diagnoses and on the total number of clinical diagnoses as a bundle that the patients had.

What the researchers found

Patients were mostly males (71%) and aged 45-54 years old (26.7%). Over half (51.4%) of the patients had PG as a principal diagnosis. In addition, less than half (42.9%) of the patients had PG as a primary diagnosis. This means that PG was the disorder that required the most care.

The most common co-occurring disorders among patients who had PG as a principal diagnosis were anxiety disorders (27.8%), mood disorders (25.6%), and substance use disorders (17.8%). The most common co-occurring disorders among patients who had PG as a primary diagnosis were mood disorders (34.7%), anxiety disorders (17%), and substance use disorders (9.3%). Depression was also common among the patients (13.3% and 7.5%, respectively).

The likelihood of receiving care by clinician specialty varied greatly by patients' diagnosis and number of co-occurring disorders. Patients with PG as a principal diagnosis were three times more likely to receive care from psychologists and social workers. They were less likely to receive care from PCPs and psychiatrists. But PG patients with depression were three times more likely to receive care from PCPs.

Compared to patients with one diagnosis, patients with three clinical diagnoses were three times more likely to receive care from a PCP and five times more likely to receive care from a psychiatrist. Patients with four or more co-occurring disorders were almost six times more likely to receive care from a PCP.

How you can use this research

Because PG patients may seek treatment for their co-occurring disorders rather than gambling problems, mental health and substance use treatment providers should screen for gambling problems among their patients. Health care systems should ensure that care for PG and other co-occurring disorders are coordinated effectively.

About the researchers

Rosa Rodriguez-Monguio, Maria Errea, and Rachel Volberg are affiliated with the School of Public Health and Health Sciences at the University of Massachusetts Amherst in the United States. For more information about this study, please contact Rosa Rodriguez-Monguio at rmonguio@schoolph.umass.edu.

Citation

Rodriguez-Monguio, R., Errea, M., & Volberg, R. (2017). Comorbid pathological gambling, mental health, and substance use disorders: Health-care services provision by clinician specialty. *Journal of Behavioral Addictions*, 6(3), 406-415. <https://doi.org/10.1556/2006.6.2017.054>.

Keywords

Behavioral addictions, mental health disorders, treatment provision, clinician specialty, pathological gambling, All-Payer Claims Data

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Examining gambling subtypes and gender differences in a population-based study

What this research is about

Gambling is a gendered activity. Past research shows that men and women start gambling at different ages and for different reasons. They may engage with and prefer different forms of gambling. However, the majority of research is focused on men with problem gambling, even though women make up one-third of people with problem gambling. Also, past research is largely based on people seeking treatment, despite treatment seekers constituting a very small minority of people experiencing problem gambling. Most of the studies also focus on people who are clinically diagnosed with problem gambling, without studying the various subtypes of gamblers such as recreational or at-risk gamblers.

For these reasons, this study seeks to fill in some research gaps related to gender and gambling. Specifically, this research uses a sample of a population to comprehensively understand gambling subtype behaviours and how they differ by gender.

What the researchers did

The researchers used data from the Baseline General Population Survey of Massachusetts conducted in 2013-2014. This study was the most recent study to measure gambling and problem gambling among adult residents in Massachusetts. In total, there were 9,523 participants who reported their gambling behaviours.

In that survey, participants were first asked how frequently they engaged in 10 types of gambling. Those who gambled at least once a month completed the Problem and Pathological Gambling Measure (PPGM), which was used to assess gambling behaviours. The survey also contained questions

What you need to know

This study examined gambling behaviours by subtype and gender. The researchers analyzed data from the Baseline General Population Survey of Massachusetts. There were 9,523 participants in total. Results revealed few differences between men and women with regard to gambling. For instance, having friends and family who regularly gamble and gambling at casinos predicted at-risk and problem/pathological gambling for both men and women. However, women at-risk gamblers were more likely to play bingo and have anxiety/depression, but men were more likely to gamble "to feel good" about themselves. Women with problem/pathological gambling were more likely to have problems with drugs or alcohol in the past year, while men were more likely to have an unhappier childhood, gamble online, and identify as Hispanic.

about demographics, recreation, physical and mental health, and alcohol and drug use. With respect to gambling, it asked participants about their motivations for gambling, awareness of services related to problem gambling, and importance of gambling as a recreational activity.

The researchers explored differences between genders and across subtypes of gamblers. For both genders, they compared between recreational and non-gamblers, recreational and at-risk gamblers, and recreational gamblers and people with problem/pathological gambling.

What the researchers found

The results revealed that men and women non-gamblers were quite similar. For instance, for both genders, the two strongest predictors for being non-gamblers were having less friends and family involved in gambling and not having consumed alcohol in the last month.

Men and women also had similar factors that predicted being at-risk gamblers. The two strongest predictors were having more friends and family who are regularly involved in gambling and engaging in casino gambling. However, there were two factors that predicted at-risk gambling in women and not in men. These were gambling on bingo and having mental health problems (anxiety and/or depression). Men and women who were at-risk gamblers also had similar motives for gambling. Both genders gambled to win money, for excitement/entertainment, to escape, and/or for distraction. For men only, gambling to feel good about themselves was a predictor for at-risk gambling.

With respect to problem/pathological gambling, men and women again displayed some similarities. These included having friends and family who regularly gamble, gambling at casinos, and having problems with other behavioural addictions. Also, non-US born people were more likely to be non-gamblers and have gambling problems. This result suggested that non-US born men and women were less likely to gamble but when they did, they usually experienced more problems.

Despite the similarities, one predictor for problem/pathological gambling in women was having problems with drugs or alcohol in the last year. This was not observed in men. Likewise, there were a few factors that predicted problem/pathological gambling in men but not women. These were having an unhappier childhood, gambling online, and identifying as Hispanic.

How you can use this research

This research could be used by service providers and clinicians. Prevention and treatment plans could be targeted for each gender and subtype to reduce

gambling related harms. Future research could continue to monitor factors that are related to gambling and how they differ by subtype and gender. Further studies could replicate this study with other populations and see whether the results are comparable in men and women.

About the researchers

Danielle Venne is affiliated with the Center on Medical Product Access, Safety & Stewardship at Georgetown University in Washington, DC, USA.

Alissa Mazar and **Rachel Volberg** are affiliated with the School of Public Health and Health Sciences at the University of Massachusetts Amherst, MA, USA. For more information about this study, please contact Alissa Mazar at amazar@umass.edu.

Citation

Venne, D., Mazar, A., & Volberg, R. (2019). Gender and gambling behaviors: A comprehensive analysis of (dis)similarities. *International Journal of Mental Health and Addiction*. Advance online publication. <https://doi.org/10.1007/s11469-019-00116-v>

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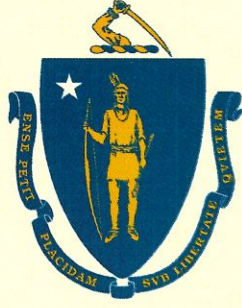
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The Commonwealth of Massachusetts



A Proclamation

Whereas, In the pursuit of maximizing the benefits of casino gaming in Massachusetts, the Commonwealth must tirelessly seek to minimize any potential harm, including problem gambling; and

Whereas, Research reveals that problem gambling affects over 110,000 Massachusetts residents and another 440,000 residents are at-risk of developing a problem; and

Whereas, Problem gambling disproportionately impacts certain groups, but any Massachusetts resident, regardless of age, race, or ethnic background, can be affected; and

Whereas, Massachusetts made an unprecedented commitment to support research on gambling behaviors and problem gambling to inform effective prevention and treatment programs; and

Whereas, The Commonwealth recognizes the importance of a multi-pronged strategy to combat problem gambling, using community-based prevention along with responsible gaming approaches that combine casino-based with public outreach and education strategies; and

Whereas, The Commonwealth further recognizes the important role numerous individuals, professionals, organizations and stakeholders across Massachusetts play in educating the public about problem gambling and the availability and success of treatment,

Now, Therefore, I, Charles D. Baker, Governor of the Commonwealth of Massachusetts, do hereby proclaim March 1st to March 31st, 2020, to be,

PROBLEM GAMBLING AWARENESS MONTH

And urge all the citizens of the Commonwealth to take cognizance of this event and participate fittingly in its observance.

Given at the Executive Chamber in Boston, this twelfth day of February, in the year two thousand and twenty, and of the Independence of the United States of America, the two hundred and forty-third.

BY HIS EXCELLENCY

Handwritten signature of Charles D. Baker in blue ink.

CHARLES D. BAKER
GOVERNOR OF THE COMMONWEALTH

Handwritten signature of Karyn E. Polito in blue ink.

KARYN E. POLITO
LT. GOVERNOR OF THE COMMONWEALTH

Handwritten signature of William Francis Galvin in blue ink.

WILLIAM FRANCIS GALVIN
SECRETARY OF THE COMMONWEALTH

God Save the Commonwealth of Massachusetts

Assessing the Impact of Gambling on Public Safety in Massachusetts

ANALYSIS OF MGM SPRINGFIELD'S
FIRST YEAR

Christopher W. Bruce

Crime analysis consultant



Summary

MGM Springfield opened in August 2018. This report covers September 2018 through August 2019.

During the year, it was in the top two crime and call-for-service locations in the region, having the on-site impact roughly of a shopping mall.

Clear impacts on traffic issues and volume-based calls for service in the immediate area.

Possible ties to some property crime patterns.

Ominous trends in drunk driving.

Methodology

Data collected from records systems of Springfield, Agawam, Chicopee, East Longmeadow, Hampden, Holyoke, Longmeadow, Ludlow, Northampton, West Springfield, and Wilbraham

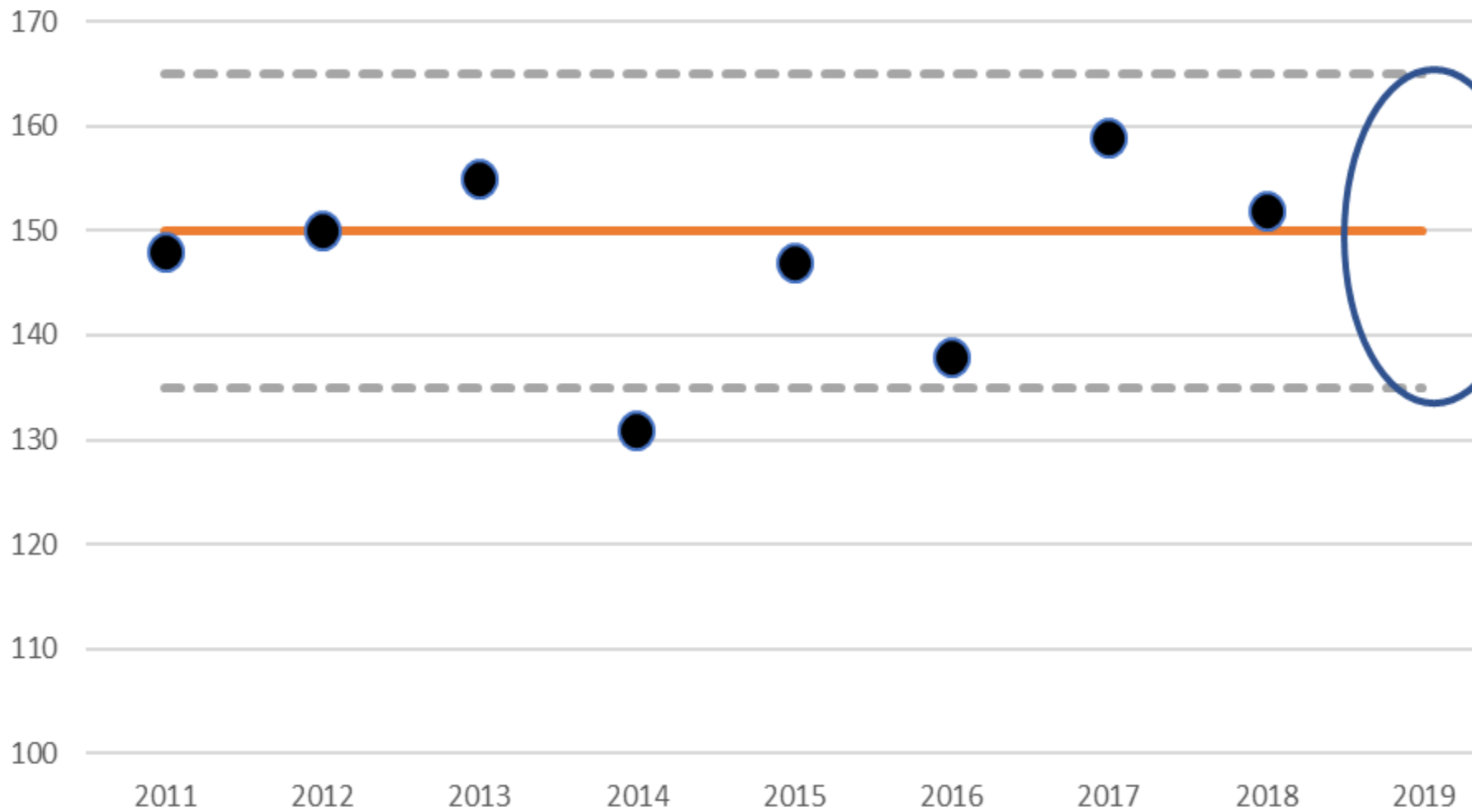
Merged and translated into common database.

Period of September-December compared against past periods since 2012. Unusual changes noted.

Different statistical methods used depending on whether crime already showed a trend.

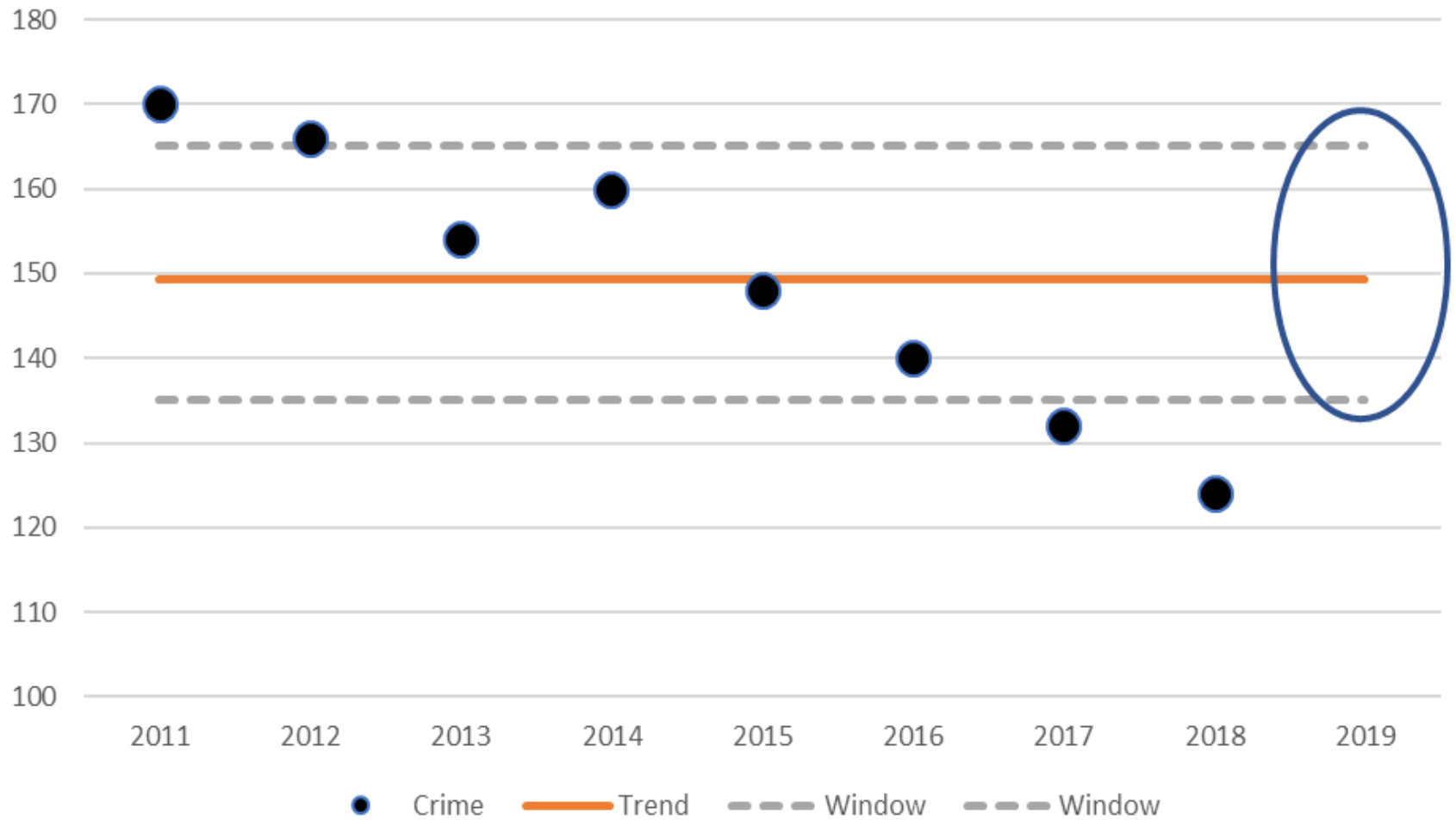
Any category significantly higher than normal fully analyzed with collected data, plus some questions back to participating agencies

Forecasting a Crime by Average and Standard Deviation

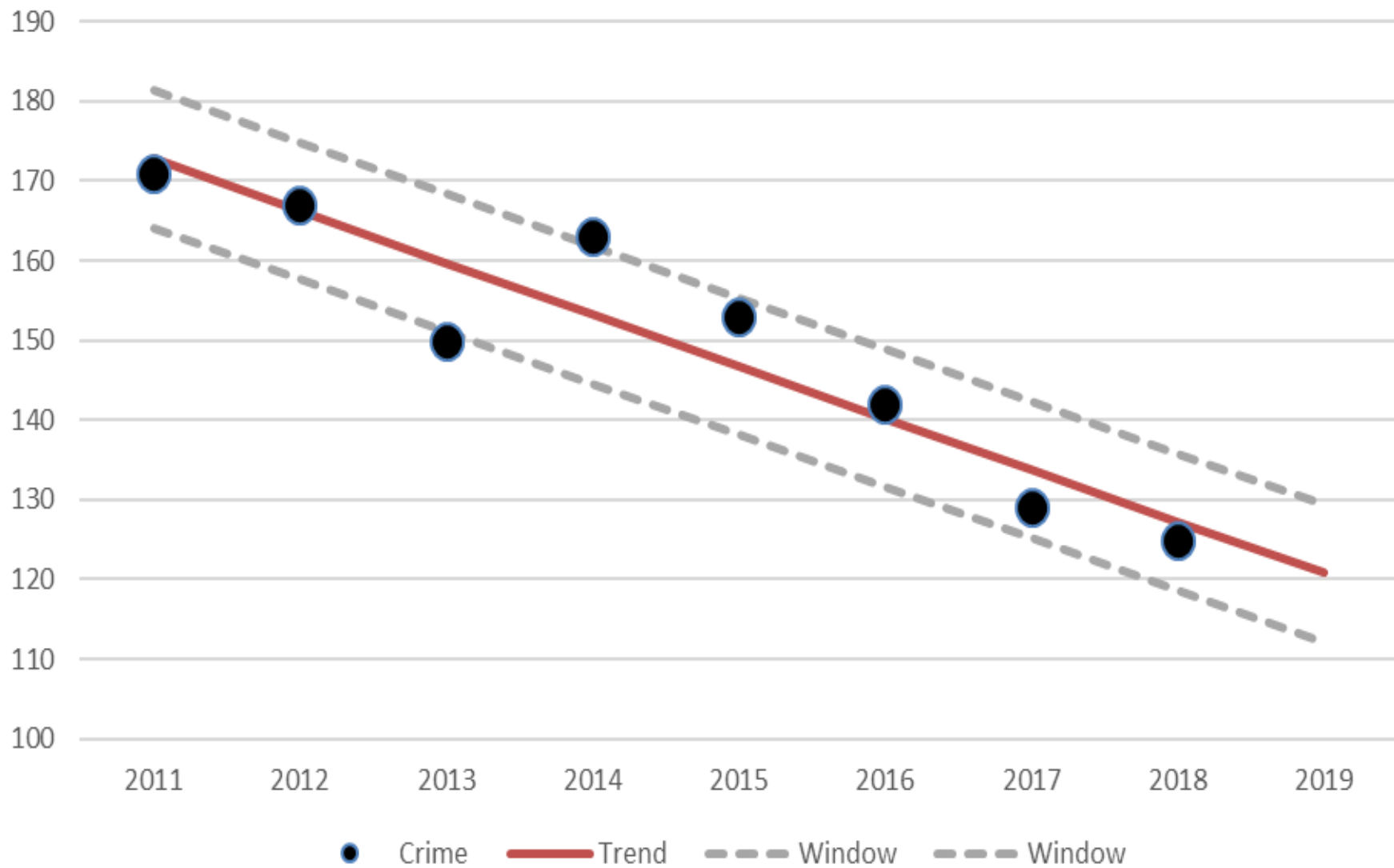


● Crime — Trend - - - Window - - - Window

Forecasting a Crime by Average and Standard Deviation



Forecasting a Crime with a Trend



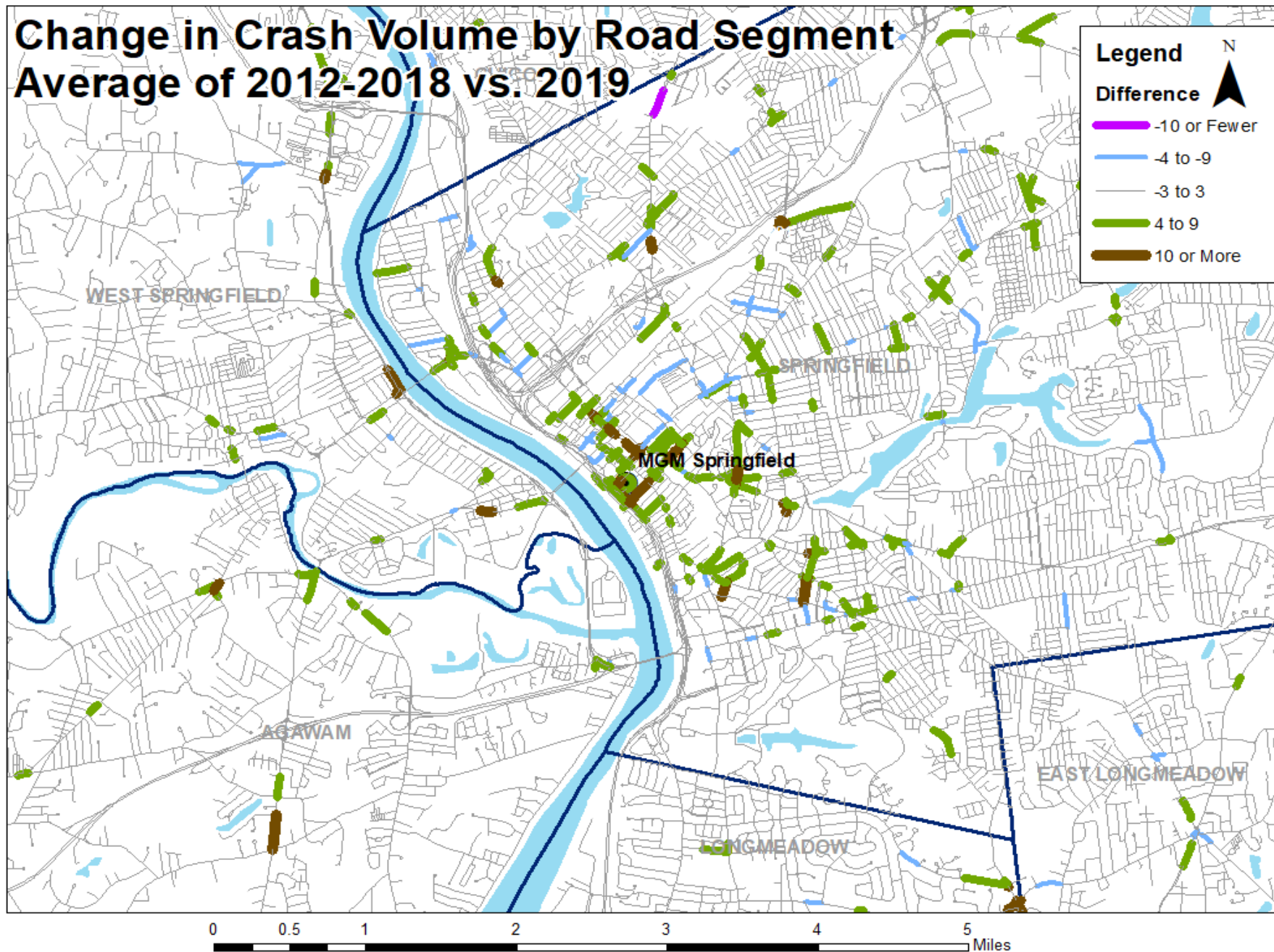
Crimes reported to Gotham, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	Actual 2019	Result
Murder	5	0	C	3–7	5	Expected
Sexual Assault	65	-7	T	18–67	77	High
Kidnapping	18	0	C	16–20	23	High
Robbery	201	-21	T	75–215	163	Expected
Aggravated Assault	317	-15	T	205–334	331	Expected
Simple Assault	1065	-27	T	884–1093	1042	Expected
Threats	606	-8	C	569–643	536	Low
Arson	13	-2	C	2–24	5	Expected
Burglary	551	-112	T	161–367	310	Expected

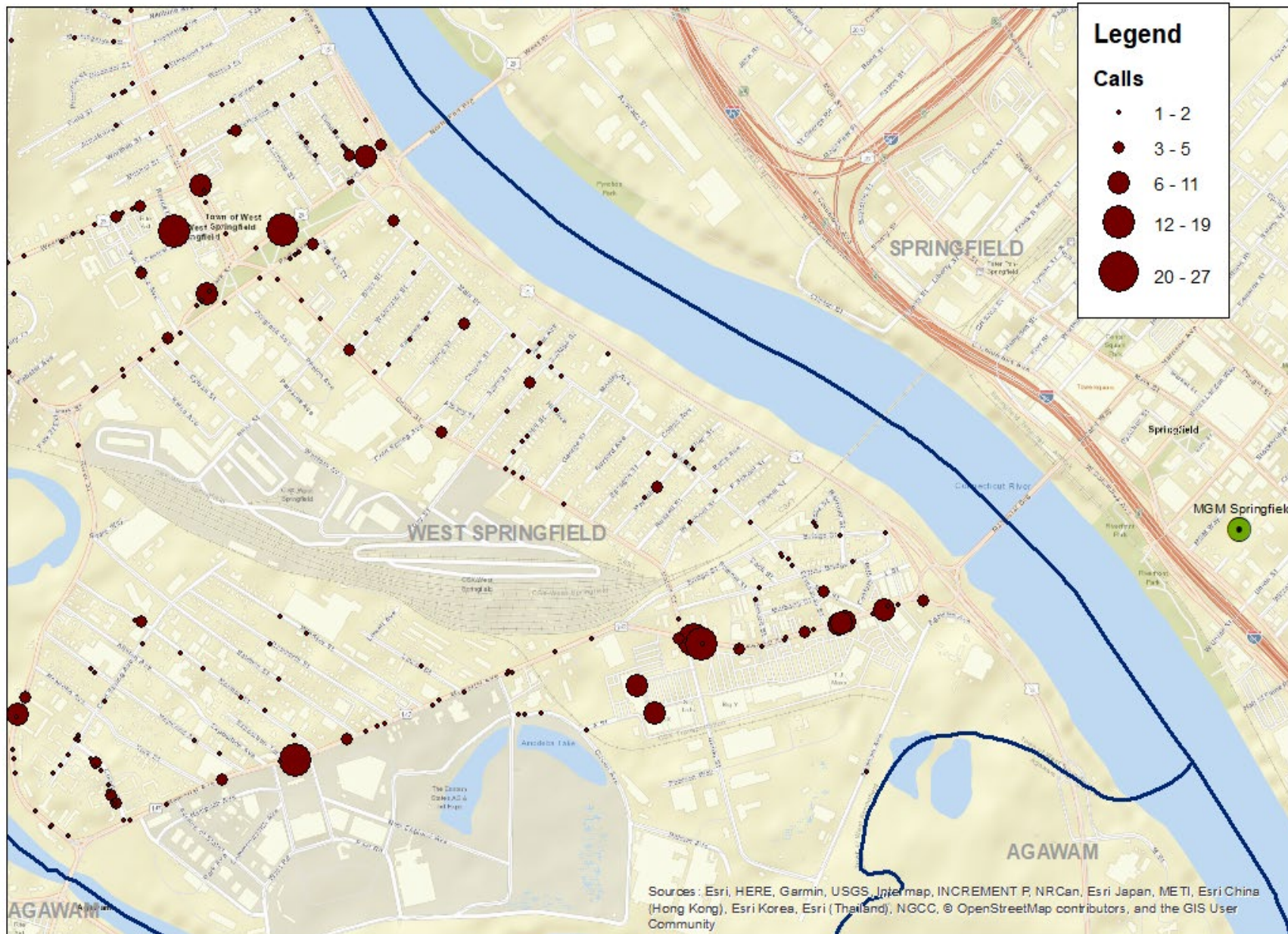
Signs of a casino relationship

Sign	Hypothetical example	Hypothetical opposite
Type of crime logically tied to activity at casino	Increase in robberies in surrounding area	Increase of thefts of property at schools
More offenders and victims from outside the local area	Increase in domestic dispute and violence calls at area hotels	Increase in domestic dispute and violence calls at homes
Same category increasing in multiple agencies	3 of 5 communities see increase in thefts from cars	1 community reports increase in burglary while 4 report decreases
Complementary increases in related offenses	Theft, robbery, and fraud all increase in area	Only identity theft increases in area
Casino specifically mentioned by offenders/victims	Drunk drivers mention they were last drinking at casino	Serial burglar admits to stealing for heroin
Increase is spatially related to location of casino	Traffic collisions increase near highway exits to and from MGM	Traffic collisions increase on residential roads in Hampden
Increase only happened in MGM area, not in control communities or statewide	Thefts from vehicles went up 20% in MGM area but went down 5% everywhere else	Identity theft increased 20% in MGM area but also increased 20% statewide

Change in Crash Volume by Road Segment Average of 2012-2018 vs. 2019



Suspicious Activity Calls in West Springfield September 2018 to August 2019



Similar “volume-based” issues

“Lost property” increase in Agawam and the State Police.

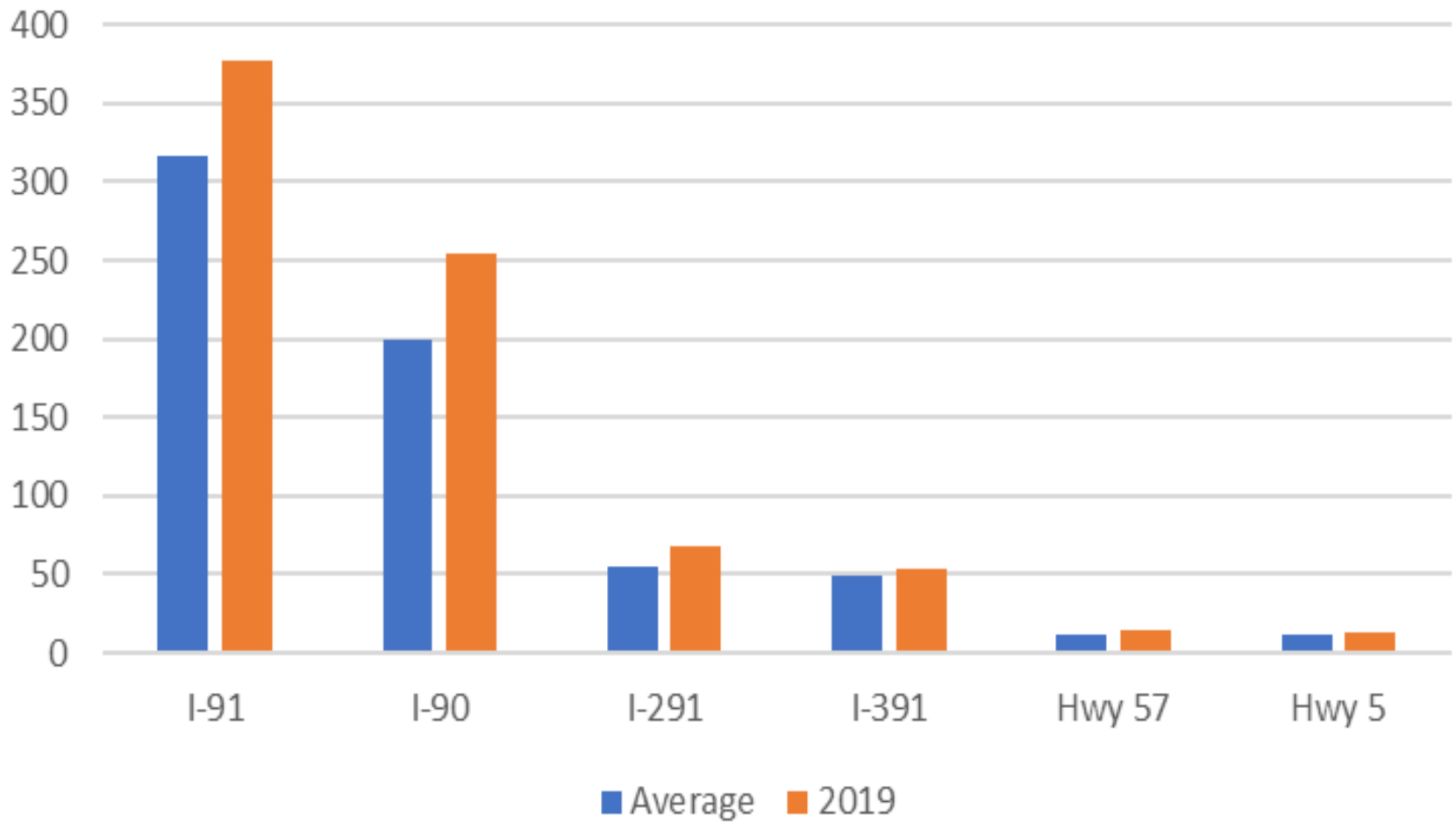
“Traffic complaint” increases in Agawam and Wilbraham and on state roads.

“Abandoned Vehicle” increases in Chicopee and Ludlow.

“Disturbance” calls to the State Police

“General service” calls to “assist motorists” reported to the State Police.

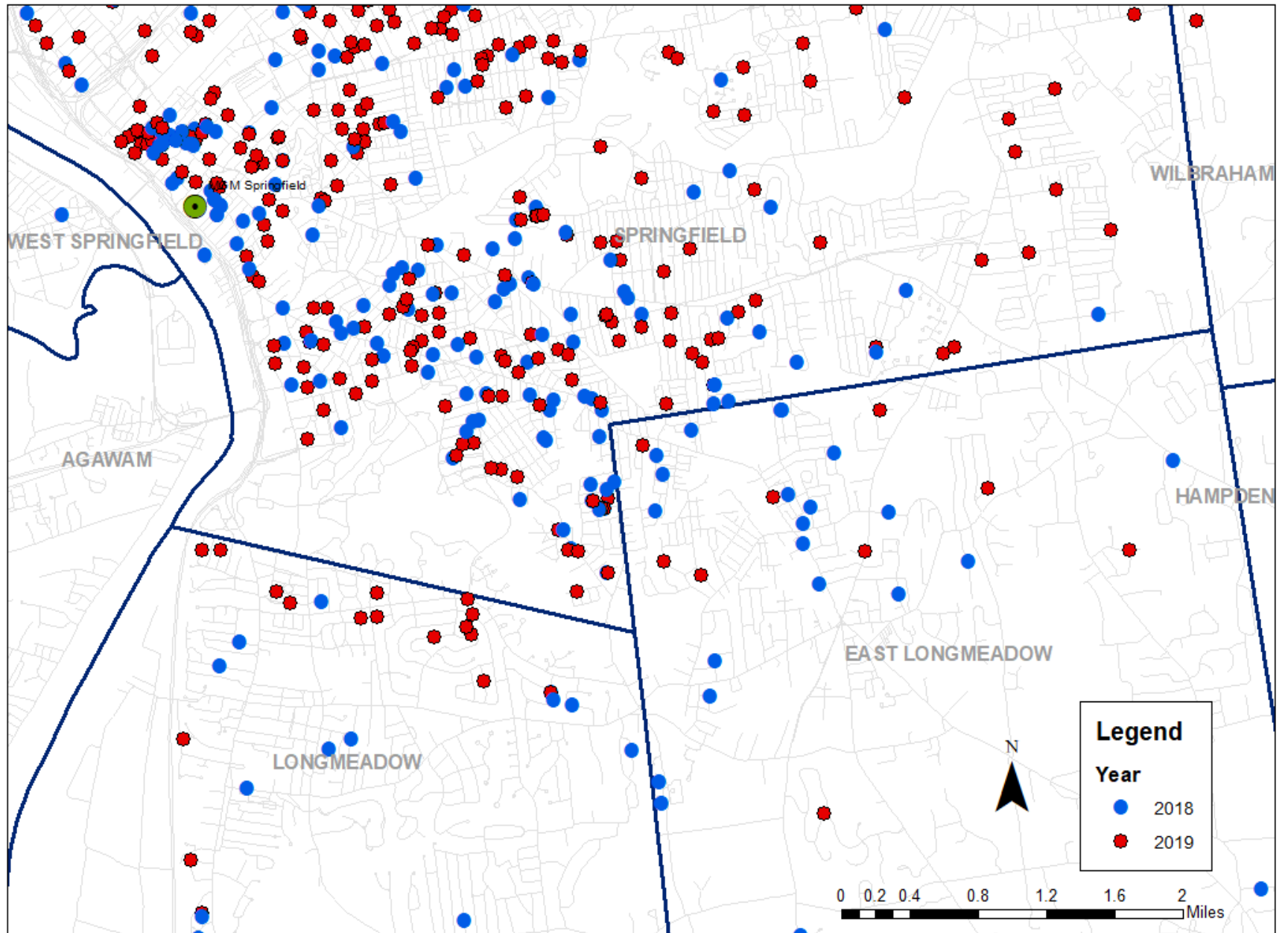
Traffic Complaints on Area Highways



Patterns possibly related

1. **Purse snatchings** in Springfield, Chicopee, and Holyoke
2. **Thefts from vehicles** in residential driveways in Springfield, Longmeadow, and East Longmeadow
3. **Fraud** (con games) throughout the region, particularly Springfield, Holyoke, Northampton, West Springfield.
4. **Shoplifting** increases in Chicopee, Holyoke, Wilbraham (intelligence points to organized retail theft rings).

Thefts from Vehicles at Residences



Probably not related

Increases in domestic assaults, domestic disputes in some communities.

Pornography increases in several communities (teenagers sending “selfies”)

Liquor law violations in several communities (evidence points to more traffic stops)

Extra gunshot complaints in Holyoke.

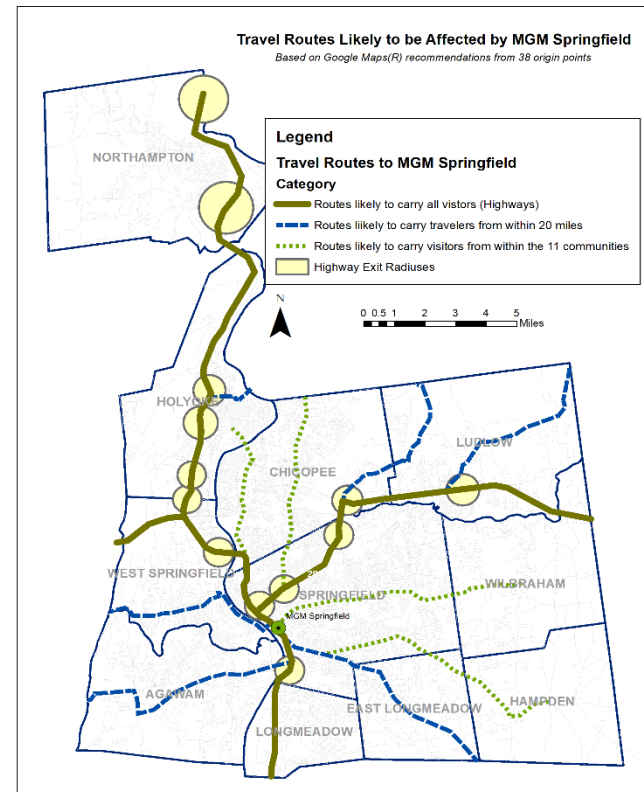
Auto theft increases in Northampton.

What did not happen

No increases at hotels, restaurants, bars, convenience stores, gas stations (except Pride station across from MGM)

No increase in “exit radiuses” to and from MGM.

No increase in the immediate areas around MGM. In fact, violent crime was unusually low in Metro Center and surrounding neighborhood.



Drunk Driving

ABCC reports MGM was the site of 7 “last drinks” in cases adjudicated 1 July 2019 to 30 January 2020, highest single location.

Agawam and Chicopee both had significant increases in drunk driving arrests (crime was otherwise lower than normal for the region).

Crashes that lead to a drunk driving arrests were up 122% for the region (53 in 2019 vs. average of 22).

Will try to get “last drinks” from agency records for next report.

Next Report

Full analysis of drunk driving

Comparison to control areas

Analysis of fraud cases

Comparative statistics for casino-specific crime

Thank You!

Christopher W. Bruce

Crime analyst consultant to the
Massachusetts Gaming Commission

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Assessing the Influence of Gambling on Public Safety in Massachusetts Cities and Towns

Analysis of changes in police data following one year of activity at MGM Springfield

Christopher W. Bruce

Crime Analysis Consultant to the Massachusetts Gaming Commission

20 February 2020

v. 1.2

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Important note

This report was prepared for the Massachusetts Gaming Commission and Springfield-area police agencies by a contracted consultant. Although both the Commission and the chief executives of the agencies were allowed to review, comment, and offer alternate viewpoints, the final conclusions are the consultant's and do not necessarily reflect the views of the Gaming Commission nor the contributing police agencies.

Many statistics are offered in this report that show increases and decreases in certain categories in Springfield and surrounding communities. In all cases, when aberrations have appeared, I have done my best to analyze them and determine their cause. Until analyzed, statistics that indicate notable increases or decreases in activity are simply *indicators* worthy of further analysis, and not proof of any particular "cause" of the changes. **No statistic offered in this report should be taken, by itself, as proof of a casino cause.** Anyone who cites or reports the statistics without a thorough consideration of additional factors is using this report irresponsibly.

Executive summary

Summary

MGM Springfield opened on 24 August 2018 in the midst of a dense, urban area with a historically higher-than-average, but decreasing, crime rate. The large number of patrons drawn to the casino and their associated offenses and victimizations have made the facility the top location for crimes and calls for service in the region, although the overall effect on the region's numbers is mild. In the first year after MGM opened, the most conclusive evidence of effects on public safety has been in certain calls for service related to traffic and visiting population numbers, such as traffic collisions, traffic complaints, and disabled vehicles. Even these are regionally localized and seem to be affecting the southern communities more than the northern ones. There have also been a couple of micro locations close to MGM—principally Union Station in Springfield, a gas station on the same block as MGM, and commercial areas across the bridges in West Springfield—that have seen increased activity. The region has also seen increases in thefts from vehicles, fraud, and purse snatchings, but any direct MGM association remains uncertain.

About this report

- The primary purposes of this report are to conduct an analysis of the increases and decreases in activity in the communities surrounding MGM Springfield since the casino opened, to identify which changes in activity might be attributable to the casino, and to triage trends for more detailed analysis and response among the participating agencies.
- Data was collected from the records management systems of the Springfield, Agawam, Chicopee, East Longmeadow, Hampden, Holyoke, Longmeadow, Ludlow, Northampton, West Springfield, and Wilbraham Police Departments and the Massachusetts State Police. Crimes, calls for service, and collisions during the period of September 2018–August 2019 were compared to the same months over the previous 5 to 7 years, depending on the data quality of the participating agencies.
- Any significant increases were analyzed in more detail with available quantitative data.
- To determine likelihood of a casino relation, I used a rubric of my own design that analyzes the data for several variables: logical connection to a casino, complementary increases in other communities, complementary increases in similar crimes, evidence of increased participation from individuals outside the local area, spatial proximity to the casino, comparison to control communities, and specific mention of the casino or gambling in the police reports.
- Because many of the crimes in these communities were on downward or upward trends, the report compares the eight post-casino months to a range of “expected” values depending on the strength of the past trend.

Major findings

- The casino itself has been the site of several hundred crimes, including violent crimes, property crimes, and police responses for other types of activity. As such, it has risen to the top of the local area list of high-crime addresses and has about as much activity as a large shopping mall.
- To the extent that the casino has “caused” crime, however, it seems largely confined to the casino itself. Both the immediate block around the casino, the Metro Center of Springfield, and the surrounding residential and business community all have normal-to-low volumes, suggesting that attractors of more crime (i.e., extra people in the area) and suppressors (i.e., extra natural guardianship, extra police presence) are canceling each other out.

- The surrounding communities saw some increases and decreases but very few consistent trends to which MGM Springfield serves as a clear source. Issues most likely influenced by the casino include:
 - An increase in traffic collisions and traffic-related calls for service (disabled vehicles, abandoned vehicles, traffic complaints) on state highways and some local roads, particularly to the south and west of the casino (notably in Agawam and West Springfield).
 - An increase in activity at Union Station in Springfield specifically. (The facility had been closed between 1973 and 2017, but crimes and calls increased even in comparison to the combined values at the previous train station and bus stations.)
 - An increase in minor disorder and suspicious activity just across the two bridges in West Springfield.
 - An increase in late-night activity at the Pride gas station across the street from MGM.
- There were several common trends among the agencies for which no direct MGM nexus could be identified (e.g., an arrested offender known to visit the establishment) but which have a logical connection, a spatial connection, or both:
 - A pattern of thefts from vehicles in residential driveways, overnight, usually involving unlocked cars, stretching south and east from MGM, to include the Forest Park area of Springfield, northern Longmeadow, and northeastern East Longmeadow.
 - An increase in purse snatchings seen in the downtown areas of Holyoke, Chicopee, and Springfield, as well as West Springfield during the fall only.
 - Increased fraud throughout the region, often manifesting in telephone calls trying to convince residence that they owe money to the I.R.S. or that a family member is in danger.
- The surrounding communities had several joint trends for which there is no logical tie to MGM Springfield but are still worth addressing to improve public safety in the region. These include:
 - An increase in domestic violence and domestic disputes in Agawam, Ludlow, and perhaps Longmeadow.
 - Increases in pornography-related offenses in several communities. Judging by the locations of the incidents and the demographics of those involved, these seem to be a trend of “selfies” and “sexting” among local teenagers, and not anything occasioned by the casino.
- There is evidence of increased drunk driving in the region caused by the casino. Agawam and Chicopee both reported higher-than average totals, and MGM showed up seven times among “last drink” locations from adjudicated drunk drivers between July 2019 and January 2020. However, drunk driving arrests for the 11-community region are down slightly from their average.
- Despite hypotheses from before the casino opened, there is so far no sign that the presence of the casino has increased crime or calls for service at hotels, restaurants, bars, and gas stations (excepting the one mentioned above), nor has it increased activity specifically within the radiuses of highway exits to and from the facility.

Background and methodology

Background

This analysis is the latest in an effort by the Massachusetts Gaming Commission (MGC) to assess the social and economic influences of new gaming facilities across the state. Primary work in this area is being done by the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study at the University of Massachusetts Amherst School of Public Health & Health Sciences, drawing upon research and experiences in many other states.

Although many studies had attempted to study the effects of gambling on overall rates of serious crimes, aggregated annually, hardly any studies have attempted to analyze more specific and minute changes in public safety activity following the opening of casinos, including variations by hour, month, and season, changes in patterns and hot spots, and changes in non-crime activity such as traffic collisions and calls for service. The MGC was interested in the answers to these questions—in analyzing public safety at a level of detail that would actually help police agencies anticipate and respond to emerging and changing problems.

In 2014, the MGC contracted with a career crime analyst, the author of this report, to extract data from the agencies likely to be affected by the opening of Massachusetts’s new casinos, and to design a process for assessing changes in those agencies’ activity on a periodic basis. Work began in 2015 with baseline and first-quarter analyses of the Plainville area, where Plainridge Park opened in June. As of this date, four years’ worth of reports have been issued covering changes in crime and other public safety issues since Plainridge Park opened.

MGM Springfield opened in late August 2018. This is the third report that investigates that casino’s influence on the surrounding community.

Publicly-issued and planned reports on changes in crime and police activity from this project

Issued	Report	Notes
August 2015	Report on baseline activity at Plainville area agencies	Established statistical measures for post-casino comparison
November 2015	Evaluation of change in police data after the first three months of Plainridge Park	Few changes discernible in immediate 3 months.
April 2016	Analysis of changes in police data after the first six months of operation at Plainridge Park Casino	Identified traffic-related calls for service as likely related to PPC. Noted increases in fraud-related crimes.
December 2016	Analysis of changes in police data after the first year of operation at Plainridge Park Casino	Continued to note increases in traffic-related calls; established credit card fraud increases as “likely related.”
December 2017	Analysis of changes in police data after the first 2 years of operation at Plainridge Park Casino	Most comprehensive report so far. Included comparative analysis of control areas.
June 2018	Report on baseline activity in Springfield-area agencies	First report in preparation for MGM casino.
March 2019	Three-year analysis of Plainridge Park area.	Found no additional major trends not present in two-year report
March 2019	Four-month analysis of MGM Springfield	Showed patterns of thefts from vehicles, traffic collisions in some communities, other scattered patterns
September 2019	Eight-month analysis of MGM Springfield	Showed increases in traffic collisions and complaints but few crime increases.

Issued	Report	Notes
September 2019	Baseline analysis of Encore Boston Harbor area	First report on this casino
October 2019	Four-year analysis of Plainridge Park	
February 2020	One-year analysis of MGM Springfield	This report
February 2020	Four-month analysis of Encore Boston Harbor	
May 2020	18-month analysis of MGM Springfield	
May 2020	8-month analysis of Encore Boston Harbor	

Methodology

The data used in this report was extracted from the individual records management systems of the Springfield, Agawam, Chicopee, East Longmeadow, Hampden, Holyoke, Longmeadow, Ludlow, Northampton, West Springfield, and Wilbraham Police Departments. I established an ODBC connection to each of these agencies' records management and computer-aided dispatch databases, connected to the databases via Microsoft Access, and used a series of "make table" queries to copy the data into Access data tables. I then copied the Access databases to my own computer, password-protecting them in the process, but leaving the originals on the agencies' networks so they could be updated by designated agency members when necessary. No personal identifying information (PII) was collected about any person (offender or victim), and I complied with various agency requests to exclude particular data elements of concern to them. These requests did not affect the integrity and completeness of the overall dataset.

After extracting the data from each individual system, I combined each table into a series of "master" tables. This required translating each dataset into a common set of codes. The uniformity imposed by the NIBRS reporting system (and the fact that all 11 agencies use the same records management and computer-aided dispatch systems) made the translation fairly easy for crime tables; it was a bit more difficult for computer-aided dispatch (CAD) tables, which have no uniform coding even among agencies using the same system.

These master tables formed the data pool for most of the statistics in this report, except where indicated.

Case#	ReportDT	Agency	IBR	Street1	LocType	Weapon
17-4793-	12/31/2017 22:37:00	SP	13A	KENSINGTON A	Residence	Knife/Cutting
17-1377-	12/31/2017 22:30:00	SP	13A	LIBERTY ST	Bar	Handgun
17-1540-	12/31/2017 19:08:00	SP	13A	CHESTNUT ST	Other/Unknow	Personal
17-5419-	12/31/2017 18:42:00	SP	120	WALDEN ST	Street	Blunt Object
17-1539-	12/31/2017 15:07:00	SP	13A	WEST ALVORD	Residence	Firearm
17-2072-	12/31/2017 14:44:00	WS	120	ELM ST	Residence	Personal
17-5412-	12/31/2017 13:17:00	HO	13A	NEWTON ST	Residence	None
17-5411-	12/31/2017 12:59:00	HO	13A	ADAMS ST	Street	Firearm
17-2071-	12/31/2017 08:52:00	WS	13A	ELM ST	Other/Unknow	Knife/Cutting
17-2071-	12/31/2017 08:32:00	WS	13A	BALDWIN ST	Other/Unknow	Personal
17-1538-	12/30/2017 22:19:00	SP	120	WALNUT ST	Convenience S	Handgun
17-2067-	12/30/2017 15:00:00	WS	120	ELM ST	Gas Station	Knife/Cutting
17-6478-	12/29/2017 23:55:00	HO	120	SOUTH ST	Street	Knife/Cutting
17-5383-	12/29/2017 20:41:00	SP	13A	HOPE ST	Residence	Knife/Cutting
17-4770-	12/29/2017 19:59:00	SP	13A	WORCESTER ST	Residence	Knife/Cutting

Figure 1: The result of a query using the combined dataset.

Interpreting the statistics in this report

This report compares one year of activity post-MGM to the statistics *expected* for the same period had MGM not opened. All statistics, except where noted, are for the period of 1 September to 31 August. When a year is given, it is the *ending* year for this period.

Throughout these reports, my goal has been to present the data using the simplest statistics possible, ensuring a reader without statistical education can still interpret the results. Understanding the statistics in this report requires first understanding two simple ways of predicting future volumes of crime, calls for service, and collisions. Consider one agency, where crime has remained static over a long period:

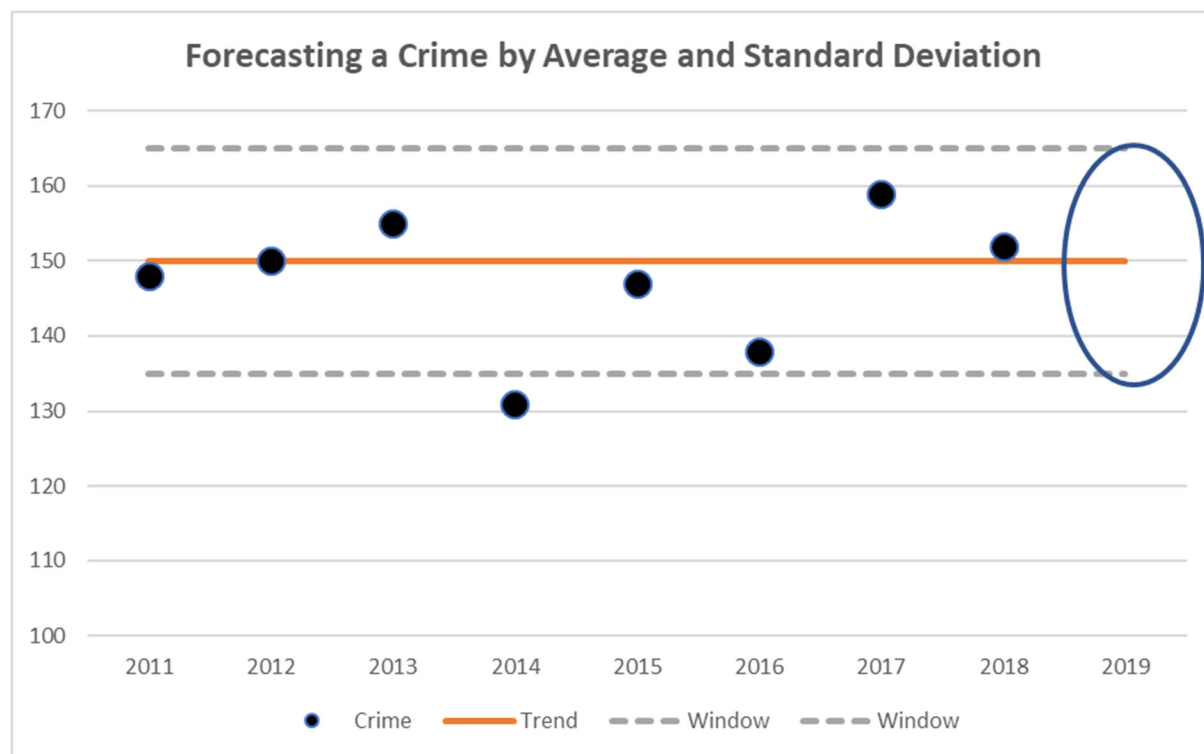


Figure 2: If a crime shows no trend over time, expected values are predicted using its average and standard deviation from the average.

In such cases, crime may vary considerably from year to year around its average, but not in a way that indicates a clear direction over the years. In such cases, we can “forecast” future activity by calculating the average (mean) of the datapoints and then using a number of standard deviations (how much the data typically varies from the average in a given year) to create upper and lower boundaries in which we would expect the data to fall a given percentage of the time. If the data for the following year falls outside this boundary, it’s a good sign that something is affecting that category other than just the normal ebb and flow of yearly crime statistics.

This particular method for creating a “prediction window” doesn’t work well when the data exhibits a clear trend over the time period in question. Consider the example in Figure 3. Here, forecasting based on the crime’s average and standard deviation results in a poor prediction because average and standard deviation tell us only where the crime has been, whereas in this case, the crime is clearly going somewhere. Hence, we need different math to forecast future activity when there’s a clear trend.

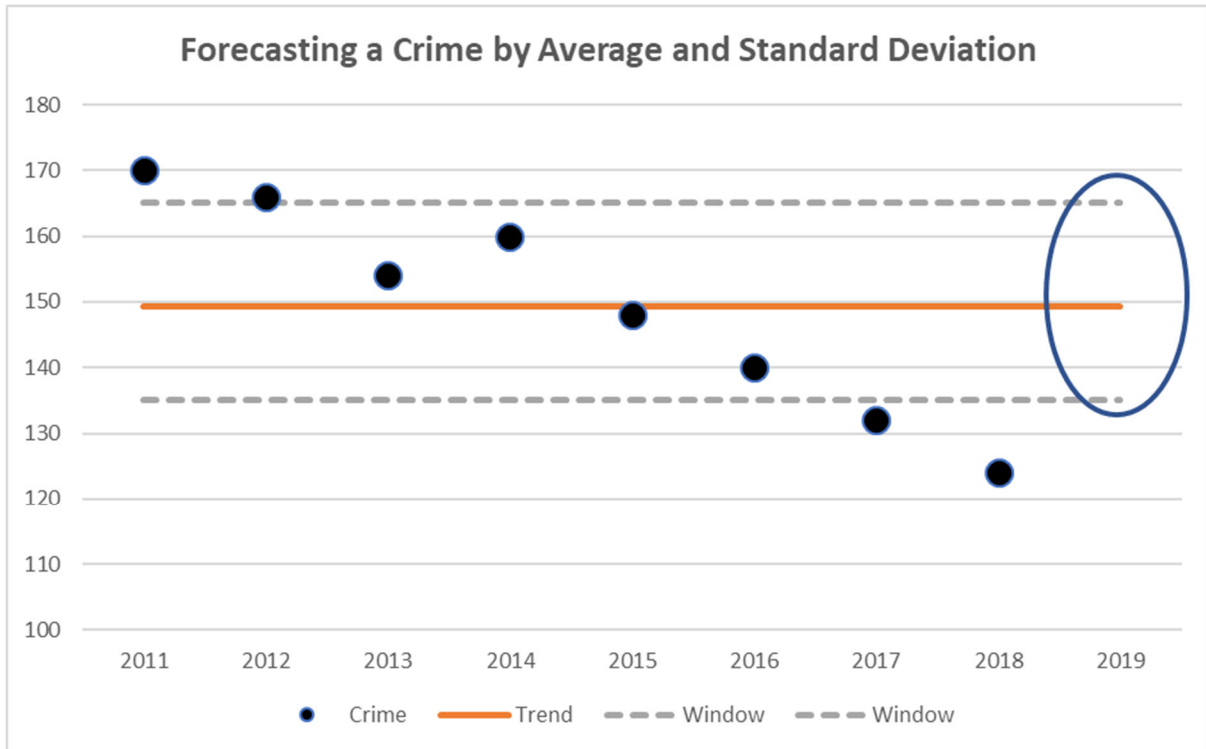


Figure 3: This method works poorly when the crime shows an increasing or decreasing trend over the period.

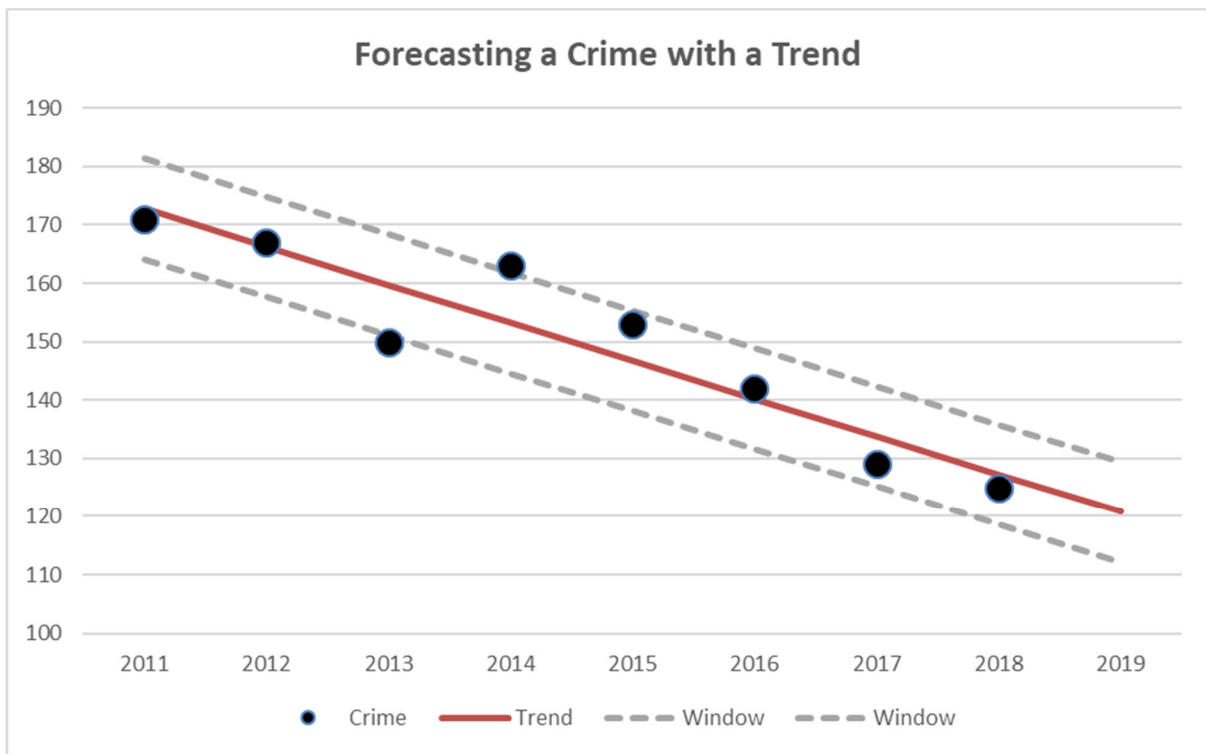


Figure 4: Trends require an alternate method of prediction that take into consideration the trendline and the normal variance around the trendline.

To create prediction windows when a past trend is evident (either up or down), I used basic linear regression analysis. Although this method also works for static crimes, it tends to create prediction windows too large to be useful when the number of crimes is poorly correlated to the progression of years.

Thus, although most statistics offered in this report contain a “window” of predicted activity for the September 2018–August 2019 time period, the method used to create that window varies depending on whether the category exhibited a previous trend. In both cases, the confidence window is set to 85%, meaning that barring any significant external influence, the 2019 figure had an 85% probability of falling within that window. If it does not fall within that window, it could be just a statistical fluke, but it could also be evidence of some new factor influencing the category, of which MGM is one possibility. Further analysis helps determine how likely it is that MGM is the cause.

The following is a typical table in this report:

Crimes reported to Gotham, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	5	0	C	3–7	5	Expected
Sexual Assault	65	-7	T	18–67	77	High
Kidnapping	18	0	C	16–20	23	High
Robbery	201	-21	T	75–215	163	Expected
Aggravated Assault	317	-15	T	205–334	331	Expected
Simple Assault	1065	-27	T	884–1093	1042	Expected
Threats	606	-8	C	569–643	536	Low
Arson	13	-2	C	2–24	5	Expected
Burglary	551	-112	T	161–367	310	Expected

The columns can be interpreted as follows:

- **Pre-MGM Avg:** The mean of the years (2012–2018 for most agencies, 2014–2018 for Springfield and the total) prior to MGM, for years beginning 1 September and ending 31 August.
- **Slope:** Over the same range of years, the amount by which the crime has increased or decreased each year on the crime’s trendline. For instance, robbery had an average of 201, but that was roughly the midpoint in a trendline that shows a steady decline (averaging -21 incidents per year) over the period.
- **Window Type:** Designates the method used for the predictive window. If the crime shows little or no trend (i.e., a small slope compared to the mean), I used the central tendency/standard deviation method designated by a “C.” If it showed a strong trend, I used the regression method designated by a “T.”
- **Predictive Window:** The window in which we would have expected the 2019 figure to fall, with roughly 85% confidence. The more erratic and unpredictable the past data, the wider this window will be.
- **2019.** The actual number of that crime observed between 1 September 2018 and 31 August 2019.
- **Result:** “High” if the crime is outside its predictive window on the high end; “Low” if it’s outside on the low end; “Expected” if it’s within the window. Please note that even “High” and “Low” crimes are not proof of a casino influence; other factors could be at work in these communities, or 2019 could be that rare 15% of the time where natural fluctuations cause the crime to fall outside its normal bounds. When the crime is “High,” I have done my best to analyze it later in the section.

Determining likelihood of a casino relation

Past studies have generally limited themselves to a purely quantitative determination of whether a casino was a contributory factor in a crime increase. This study—which blends quantitative and qualitative approaches—is not content to use statistics alone to determine the likelihood that any increase in activity was “caused” by the presence of MGM Springfield. Instead, I have created a model to better explain causality when increases are observed. The model demands a more in-depth analysis of the individual cases that make up “increased” activity during the study period, including a qualitative analysis of police narratives.

The model considers seven factors:

1. *Whether the type of activity increasing has a logical relation to a casino.* Causality is more certain when it “makes sense” that such a crime or other activity would increase in the surrounding area in a particular way. Because casinos draw a large number of people to an area, and because cash plays a large role in their operation, there are very few crimes that would not fit this definition, but it’s still worth considering. An increase in theft or traffic issues has a logical connection to a facility like a casino; an increase in harassing telephone calls or animal complaints does not.
2. *Whether more offenders and victims are from outside the local area.* If there is a relation between an observed increase in activity and the presence of MGM Springfield, one would expect a corresponding increase in the percentage of victims and offenders from outside the immediate community, as the casino draws visitors from all over New England.
3. *Whether multiple agencies are reporting an increase in the same category.* If only one agency reports a major increase in a particular crime and call for service, the cause is more likely to be related to another factor specific to that jurisdiction than to MGM Springfield. Complementary increases reported by multiple agencies strengthen the likelihood of a casino relation.
4. *Whether related offenses also report increases.* Some crime and call-for-service categories are closely related to each other, so that a factor that influences one is likely to influence the others. If the casino were to cause an increase in traffic collisions, for instance, we might expect a corresponding increase in disabled vehicles, traffic complaints, and other traffic-related calls for service. An increase in a single category without increases in complementary categories is more likely to suggest a fluke specific to that category than a casino relation.
5. *Whether the spatial distribution of offenses is related to the casino location.* For certain crimes and calls for service, if the presence of the casino caused their increase, we would expect to see a spatial distribution of incidents either near the casino or on routes to and from the casino. An increase in “disorderly conduct” in a residential neighborhood 15 miles from MGM Springfield is less likely to be caused by the casino than an increase in such activity at hotels and restaurants within 1 mile of the casino.
6. *Whether the casino is specifically mentioned by victims and offenders involved in cases.* If an increase in activity is causally tied to the casino, we would expect a certain percentage of victims to say that they were in town to visit the casino, or a certain percentage of offenders (if arrested) to admit that their crimes had something to do with the casino. If we cannot find any such evidence across multiple offenses, a casino relation is less likely.
7. *Whether comparison agencies have failed to report a similar increase.* If a certain crime increased only in the MGM Springfield area and not at identified control areas in eastern Massachusetts, this provides stronger evidence of a casino relation. Unfortunately, statewide data collection lags behind our data collection for the MGM Springfield area, and thus it is only possible to assess changes in control areas for 2016 and 2017. Note also that we cannot consider this factor with non-crime calls for service because there is no standardized reporting of this data on a statewide basis.

The table below summarizes the factors in this model and provides hypothetical examples of when they might argue for or against a casino relation. The “hypothetical examples” provided are just that—those particular changes were not actually observed.

Factor	Hypothetical example (likely to be related) ¹	Hypothetical opposite (not likely to be related)
Type of crime is logically tied to activity at casino (LOG)	Increase in robberies in surrounding area	Increase of thefts of property at schools
More offenders and victims are from outside the local area (COM)	Increase in domestic dispute and violence calls at area hotels	Increase in domestic dispute and violence calls at area homes
Same category is increasing in multiple agencies (REG)	3 of 5 communities see increase in thefts from cars	1 community reports increase in burglary while 4 report decreases
Complementary increases in related offenses (REL)	Theft, robbery, and fraud all increase in area	Only identity theft increases in area
Increase is spatially related to location of casino (MAP)	Traffic collisions increase on Route 5 in Agawam, West Springfield	Traffic collisions increase on residential streets in Northampton
Casino is specifically mentioned by offenders/victims (NAR)	Drunk drivers mention they were last drinking at casino	Serial burglar admits to stealing for heroin
No similar increase in comparison communities (OTH)	Burglary is up 10% in the Springfield area but down 5% across the state	Shoplifting increased 15% in the Springfield area but also increased 15% in three control areas

Figure 5: A rubric for determining whether an increase in a crime is likely related to the new casino.

Application of this model helped us reach a conclusion as to whether the likelihood of an increase in crime or calls for service was related to the presence of MGM Springfield. However, the model is not quantitative and the determination of the likelihood of a casino relation is not simply a matter of adding up the number of factors present. For certain incident types, one factor may outweigh the others. For instance, the spatial relation is fairly important in considering the likelihood that an increase in traffic collisions is related to MGM Springfield, but it is less important for property crimes that depend on particular location types, and hardly important at all for family violence.

Limitations and threats to validity

The primary threat to the validity of the statistics in this report is the data structure of the IMC records management system, which makes it difficult to calculate precise crime statistics. All of the participating agencies use this system².

Almost every other commercial records management system on the market stores crime incidents and their associated offenses in a master table. All crimes, whether they result in an arrest, go into the same table. If an arrest accompanies the incident, immediately or sometime after, additional data elements specific to the arrest are entered in supplemental arrest tables that link to the master tables. Crime statistics are calculated from the master

² The original system was from a locally-owned company called IMC. This company was bought by Zuercher Technologies, which was bought by TriTech Software Systems, which merged with several other companies to form CentralSquare Technologies. The current name of the RMS seems to be “Records Pro,” but locally it is still universally known as “IMC.”

tables. The IMC system, in contrast, stores criminal incidents in two separate tables: arrests and non-arrests. (There is technically a third table, storing warrants, but agencies that use this table seem to duplicate those crimes in the incidents table.) Some incidents appear in only one table; an arrest made at the time that an incident is reported, for instance, goes in the arrest table.

This immediately creates a problem when multiple individuals are arrested for the same incident. Two offenders arrested for a single robbery “incident” should count as a single robbery, but there no unique index that ties two arrest records to the same crime. We must rely on the arresting officer filling in a related case number field that does not always get filled in.

Accurate statistics cannot be calculated by simply adding the two tables, as it is possible for a single incident to appear in *both* tables. For instance, an incident may be reported on Monday. Lacking any evidence to make an arrest or issue a warrant, the reporting officer enters data into the incident table. On Tuesday, evidence points to a particular offender, he is arrested, and the officer enters the data into the arrest table.

To account for such situations, the records system contains a field in the arrest table for the original incident number. Both the arrest and incident tables also contain the original call number, which should help deconflict duplications. However, in practice, few agencies use these fields with any fidelity. Moreover, different crime types can appear associated with the same incident in each of the two tables.

Finally, the TriTech/IMC system does not appear to enforce National Incident-Based Reporting System (NIBRS) standards when it comes to the recording of secondary offenses. NIBRS recognizes “lesser included offenses.” For instance, it is assumed that every robbery is accompanied by an assault and a theft, and that almost every burglary is accompanied by a theft and a vandalism. Thus, no single crime should report both a burglary and a theft nor a robbery and an assault. Such extraneous offenses co-exist frequently in the IMC system. Indeed, by failing to distinguish between *arrest charges* and *incident offense codes*, the system creates a situation in which multiple extraneous charges often accompany an arrest.

To account for these problems, the statistics in this report adopt the following conventions:

1. Arrests and non-arrests are combined into a single record when the proper cross-indexing values were entered by the reporting officer in the system.
2. Even in absence of the index value entries, arrests and non-arrests are assumed to be part of the same incident if the reporting date/time and address are the same.
3. Multiple arrests are combined into the same “incident” if they happened at the same location and time.

The IMC system also makes a mistake—although this one is replicated among many RMS vendors—of trying to resolve Massachusetts General Law codes directly to NIBRS incident type codes. This allows officers to enter the statute violated by the offender (a code list with which they are familiar because of training and practice) and have the system itself convert it to the appropriate NIBRS code. Although this seems a valuable shortcut, in truth there is a poor relation between statutes and NIBRS codes, and such a system ensures that many crime types—principally in the theft and fraud categories—will be under-reported and a few crime types will be consistently over-reported.

Finally, there are a number of issues with agency coding practice that affect the validity of the baseline statistics and the consistency of data going forward. Common issues include:

- Overreliance on the “All Other” (90Z) IBR code instead of a more specific crime code that applies to the circumstance.
- Overuse of the “Other Theft” (23H) IBR code instead of a more specific theft type—for instance, shoplifting (23C), theft from a vehicle (23F), or theft from a building (23D).

- Rare use of the “Alcohol Involved” flag in the crash reporting module, making the data field essentially useless.
- Overuse of the “Other/Unknown” location type and property type categories.
- Under-use of the “Family Offenses” (90F) code to record restraining order violations and child neglect cases.
- Rampant confusion among the codes for fraud (26A), credit card fraud (26B), impersonation (26C), identity fraud (26G), forgery and counterfeiting (250), and bad checks (90A).

Discussions with agency representatives

Throughout the life of this series of reports, the Massachusetts Gaming Commission has repeatedly convened meetings with the police executives in the Springfield area to review the results of these analyses and receive their comments and feedback. No information about changes in the area is published without giving the local chiefs a chance to comment first. Their feedback has been incorporated into each version of the report. General agreement with these findings has been widespread, and where anyone has disagreed or offered an alternative perspective, it has been noted in this report.

About the author

Christopher W. Bruce is a professor of criminal justice at Husson University in Bangor, Maine. He is also a career crime analyst with previous service at the Cambridge Police Department (1994–2001) and the Danvers Police Department (2001–2010). He was president of the Massachusetts Association of Crime Analysts from 2000 to 2004 and president of the International Association of Crime Analysts from 2007 to 2012. He has served as an instructor in criminal justice and crime analysis topics at Suffolk University (2001–2010), Westfield State University (2009–2010), the University of Massachusetts Lowell (2009–2010), Middlesex Community College (2007–2011), Western Oregon University (2012–2016), and Tiffin University (2006–2018).

Professor Bruce is an internationally-recognized expert in police data systems and police data analysis. He has trained, consulted, and provided technical assistance for various programs of the U.S. Department of Justice, Bureau of Justice Assistance; the U.S. Department of Transportation, National Highway Traffic Safety Administration; the Texas Department of Transportation; the U.S. Department of Justice, International Criminal Investigative Training Assistance Program; and the International Association of Directors of Law Enforcement Standards and Training. He lives in Maine.

Incidents at MGM Springfield

The Massachusetts State Police and the Springfield Police Department respond to incidents occurring at MGM Springfield specifically, including the casino interior, exterior, parking garage, theater, and adjacent streets and walkways. (To further complicate matters, State Police responses are divided between the Gaming Enforcement Unit, which handles the bulk of the activity at the casino, and regular troopers from the local barracks.) Both agencies log incidents in their respective databases, and in many cases, these incidents overlap (e.g., both agencies respond, and both take a report). The State Police Gaming Enforcement Unit has primary jurisdiction inside the casino.

Two statistical sets are offered below: one for the Springfield Police and one for the Gaming Enforcement Unit at MGM Springfield. To some degree, these two tables overlap, but the specific degree of overlap cannot be determined without an incident-level comparison of the events.

Incidents at MGM Springfield reported by the Gaming Enforcement Unit

The following statistics were compiled by the Gaming Enforcement Unit from September 2018 to August 2019. These numbers should be considered the most authoritative of the sources for total figures at MGM Springfield; however, they might exclude some activity in the exterior reported to the Springfield Police.

The arrest statistics (except for the total at the bottom) are not comprehensive, but they are offered for those crimes when a specific relation could be established between the original crime code and the arrest code. For instance, there were 62 arrests for disorderly conduct, but these could not be associated with a specific originating category (likely, they are spread between suspicious persons, intoxicated persons, and "assistance to security), so they are not included in the arrests column. The point of showing the arrest figures when available is to demonstrate the very high clearance rate for crimes committed at MGM Springfield. With its ubiquitous surveillance, a casino is a spectacularly bad place to choose to commit a crime.

Crimes and other incidents, September 2018–August 2019

Crime Type	Sep–Nov	Dec–Feb	Mar–May	Jun–Aug	Total
Assaults	30	9	0	0	39
Assistance to security	660	558	340	370	1928
Assistance to other agency	61	42	22	30	155
Firearms offenses	5	0	0	0	5
Fugitive from justice	4	0	0	0	4
Gaming violations	38	36	52	27	153
Theft, fraud, embezzlement	45	40	22	30	137
Counterfeiting	20	30	30	22	102
Drug investigations	26	26	17	13	82
Robbery	4	0	0	0	4
Sexual assault	4	0	1	0	5
Intoxicated persons	92	53	38	21	204
Suspicious persons	56	33	NR	NR	89
Medical	44	67	50	42	203
Total ejections	245	169	231	160	805
Total arrests	91	44	51	22	208
Total criminal summonses	58	40	48	53	199

Incidents at MGM Springfield reported to the Springfield Police Department

Crimes, September 2018–August 2019

Crime Type	Sep–Dec 18	Jan–Apr 19	May–Aug 19	Total
Sexual assault	2	3	1	5
Robbery	1	1	1	3
Aggravated assault	4	2	0	6
Simple assault	28	14	14	56
Threats	6	3	6	15
Thefts from persons	1	1	0	2
Thefts from buildings	11	9	5	25
Thefts from vehicles	1	3	1	5
Other theft	2	4	3	9
Auto theft	0	3	3	6
Counterfeiting/Forgery	3	1	1	5
Fraud/con games	4	7	5	16
Credit card fraud	3	1	1	5
Identity theft	1	1	0	2
Employee theft	0	1	0	1
Stolen property	0	1	0	1
Vandalism	6	5	5	16
Drug offenses	4	7	5	16
Weapon violations	0	1	1	2
Disorderly conduct	30	9	12	51
Liquor laws	0	2	1	3
Trespassing	8	14	9	31

Calls for service, September 2018–August 2019

Call Type	Sep–Dec 18	Jan–Apr 19	May–Aug 19	Total
Administrative	2	2	3	7
Alarm	1	0	0	1
All other	48	73	51	122
Animal complaint	2	0	1	3
Assault*	8	6	4	18
Assist other agency	16	11	7	34
Auto theft*	2	4	1	7
Burglary*	1	0	1	2
Crime enforcement	638	631	480	1749
Disabled vehicle	1	0	0	1
Disorderly conduct	27	14	18	59
Domestic dispute	5	3	2	10
Drugs	0	5	3	8
Fire	3	1	2	6
General service	16	7	13	36

Call Type	Sep–Dec 18	Jan–Apr 19	May–Aug 19	Total
Medical	21	13	13	47
Missing person	0	1	2	3
Other theft	11	17	11	39
Overdose	2	0	1	3
Psychological	6	4	4	14
Robbery*	2	0	1	3
Service of papers	1	0	1	2
Suspicious activity	15	3	5	23
Thefts from vehicles*	1	2	0	3
Threats/harassment	0	1	0	1
Traffic collision	13	15	12	40
Traffic enforcement	4	2	3	9
Trespassing*	1	5	4	10
Vandalism*	1	2	2	5
Vehicle stop	7	6	9	22
Warrant service	10	6	2	18
Weapons violations	1	1	0	2
Well-being check	4	8	5	17

*In the case of calls for service relating to crimes, the figures offered are for the call for service as originally dispatched. Sometimes when an officer arrives on scene, he determines that the actual crime committed was different than the crime dispatched. The table above this one, which records actual reported crimes, is a better indicator of criminal activity than the call-for-service table.

How much did MGM Springfield influence Springfield’s statistics?

Nothing existed at 1 MGM Way before MGM Springfield, except a construction site, so anything that happens at the casino specifically can be said to have directly contributed to an increase in crime in Springfield, regardless if the casino influenced increases in crime in the area or not. The next sections of this report attempt to estimate the influence of the casino on the *surrounding community*, but if we want to answer the literal influence of the casino itself, the calculation is fairly simple: the percentage of activity at MGM Springfield divided by the total activity in the city. The table below shows the results.

Springfield Activity, September 2018–August 2019

Category	Number at Casino	Total Springfield Number	% New Caused by Casino
Violent crime offenses	86	6,220	+1.4%
Property crime offenses	90	7,328	+1.2%
Total crime offenses	370	24,511	+1.5%
Calls for service	2374	226,148	+1.0%

In this sense, MGM Springfield has contributed very little to Springfield’s “bottom line.” That said, in the year since it opened, it has become the single location in the 11-community area with the highest number of violent crimes, the second-highest number of calls for service, and the second-highest number of total crimes (after the Holyoke Mall). Its specific rank depends on whose statistics you consult.

Reported crime at top locations, September 2018–August 2019

Agency	Top Offense Location	Violent Crimes	Property Crimes	Total Crimes	Calls for Service
Holyoke	Holyoke Mall	50	464	704	887
Springfield	MGM Springfield	86	90	369	2242
West Springfield	Riverdale Shops	17	245	365	676
Chicopee	Chicopee Marketplace	35	176	339	1805
West Springfield	Century Center	15	178	290	623
Springfield	Springfield Plaza	53	106	228	1615
Agawam	Six Flags New England	40	93	191	149
Northampton	Walmart/Big Y Plaza	4	117	185	573
Springfield	Baystate Medical Center	41	34	153	807
Springfield	Union Station	24	1	134	2318
Holyoke	Holyoke Hospital	29	10	132	349
Holyoke	Holyoke Shopping Ctr	77	77	126	358
Wilbraham	Stony Hills Plaza	0	58	115	1398
Northampton	Meadowbrook Apts.	24	14	106	650
Springfield	Maple Starr	0	0	105	117
Springfield	Mercy Medical Center	32	22	103	668
Northampton	Highview	14	13	87	244
Springfield	Next Step	0	0	83	128
Springfield	State Street CVS	14	36	80	564
West Springfield	Eastern States Expo.	3	34	70	154
Springfield	Indian Motorcycle Bldg	32	9	68	310
Springfield	Eastfield Mall	41	41	65	506
Chicopee	Big Y	0	40	54	323
Springfield	Science & Tech High Sch	28	10	52	121
Springfield	Kennedy Middle School	32	4	51	271
Springfield	Springfield Public Day	29	6	49	192

One-year Comparison: All agencies

This section analyzes changes in crimes and calls for service in the Springfield area between the five years before MGM Springfield and the one year afterwards. For Springfield and the region as a whole, the numbers exclude MGM Springfield specifically, as they are meant to help assess notable changes in the surrounding area.

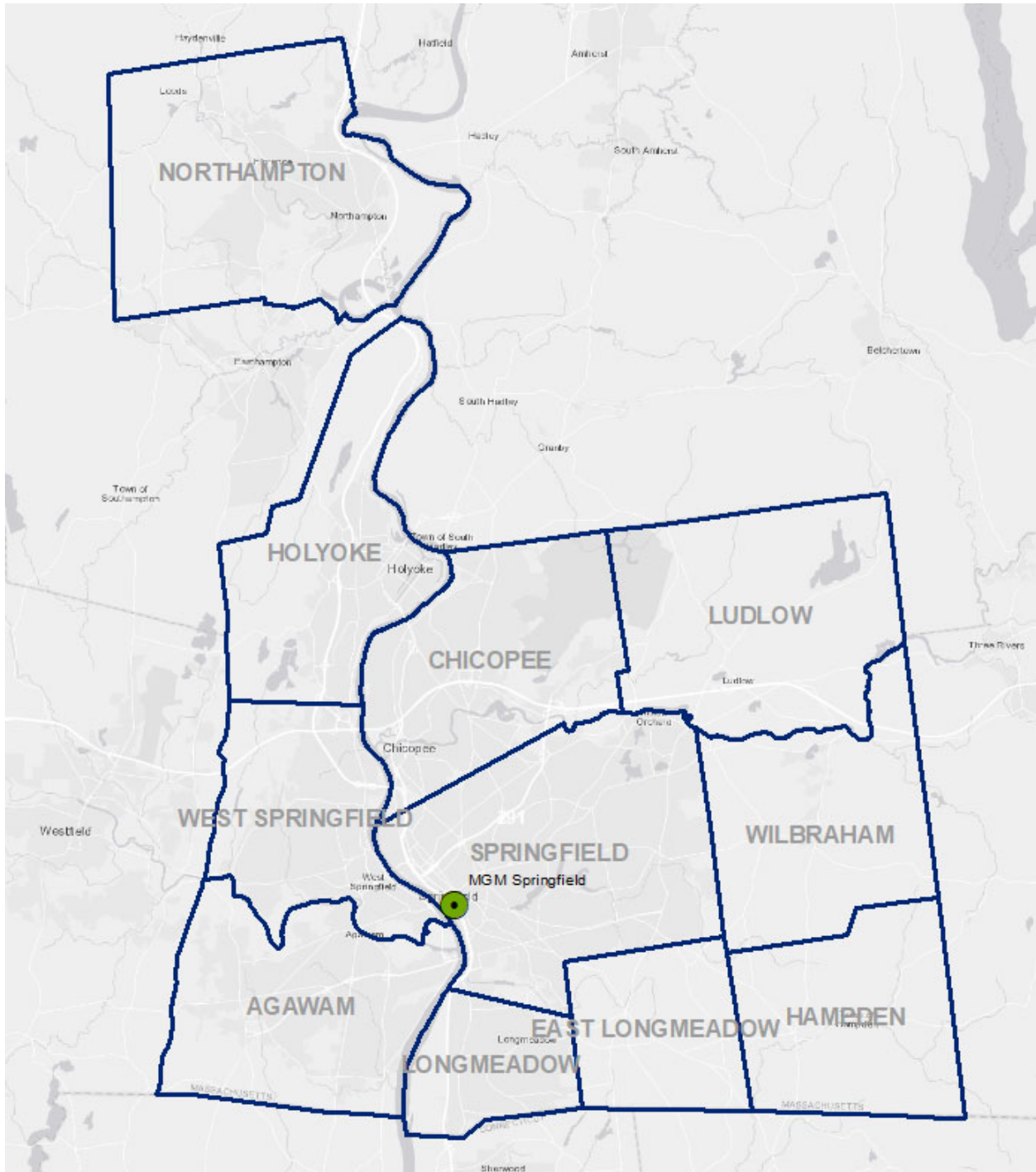


Figure 6: The communities contributing to this analysis.

The goal here is not simply to identify what crimes increased or decreased in comparison to their norms. Crimes fluctuate all the time for any number of reasons. Our goal is:

1. To determine which crimes increased *significantly enough* that some external factor—and not just random fluctuations in data—is likely to be responsible for those increases; and
2. To analyze those significant increases for evidence that MGM Springfield is that “external factor.”
3. To identify trends to be investigated more thoroughly in the next report.

On advice from the Springfield Police Department regarding changes in their data quality control, this analysis uses only the years ending 2014–2019 to determine past trends and the predictive window for that agency’s crime. Because Springfield’s total makes up so much of the region total, the report also uses only those years to calculate the regional trend. For other agencies, the report considers the full 2012–2019 data series.

Summary of all communities’ activity

The 11 contributing communities saw expected totals of overall crime, commensurate with what they would have received if MGM had never opened. The most noticeable likely effect of the casino is an increase in collisions and traffic-related calls for service in some communities that feed traffic to Springfield, particularly Agawam and West Springfield. A pattern of thefts from vehicles from residential driveways has plagued south Springfield and northern parts of Longmeadow and East Longmeadow, and there are some potential purse-snatching/theft from person patterns in Springfield, Holyoke, and Chicopee.

Incidents reported to region, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	22	1	C	17–27	25	Expected
Sexual Assault	402	-1	C	357–447	407	Expected
Kidnapping	97	0	C	80–114	112	Expected
Robbery	774	-23	T	555–809	571	Expected
Aggravated Assault	1729	14	C	1635–1823	1726	Expected
Simple Assault	5586	-95	C	5119–6053	5164	Expected
Threats	3037	-74	T	2485–2994	2560	Expected
Arson	77	-8	T	34–75	53	Expected
Burglary	3283	-366	T	1816–2298	1822	Expected
Theft from Persons	70	5	T	57–119	67	Expected
Purse-Snatching	37	-5	T	15–43	48	High
Shoplifting	1552	10	C	1442–1662	1670	High
Theft from Building	1547	-126	T	858–1630	1061	Expected
Theft from Machine	7	3	T	9–24	10	Expected
Theft from Vehicle	1634	-96	T	1158–1663	1391	Expected
Theft of MV Parts	358	49	T	349–670	355	Expected
Other Theft	5510	-763	T	2630–3509	2972	Expected
Auto Theft	1120	-49	T	837–1015	818	Low
Forgery	352	-7	C	309–395	363	Expected
Fraud	692	14	C	624–760	859	High

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Credit Card Fraud	277	41	T	371-511	348	Low
Identity Theft	700	-30	T	453-753	599	Expected
Employee Theft	68	2	C	52-84	44	Low
Extortion	17	3	C	6-33	50	High
Stolen Property	314	-7	T	242-333	247	Expected
Vandalism	4742	-231	T	3354-4345	3614	Expected
Drugs	1676	-51	T	1284-1662	1293	Expected
Statutory Rape	56	4	T	58-90	77	Expected
Pornography	52	7	T	65-93	100	High
Prostitution	59	-11	T	25-65	28	Expected
Weapons	529	29	T	569-724	648	Expected
Bad Checks	87	-7	T	49-87	30	Low
Disorderly	870	-87	T	534-800	639	Expected
Drunk Driving	493	-4	C	448-538	477	Expected
Drunkenness	297	-31	T	158-254	211	Expected
Family Offenses	157	71	T	385-528	505	Expected
Liquor Laws	198	-9	T	143-207	184	Expected
Trespassing	554	-12	C	394-714	755	High
Violent Total	11647	-179	T	9884-11975	10565	Expected
Property Total	22356	-1557	T	14779-17476	16391	Expected
Total	39031	-1195	T	31635-34882	31903	Expected

Purse Snatching

Purse snatching reported high totals in the downtown areas of Springfield, Chicopee, and Holyoke for the year, and was high in West Springfield during the first half-year. Although few commonalities can be identified among the incidents and no agency has been able to identify a specific MGM connection, the area-wide increase is at least possibly related to the casino. It is a cash crime, which has a logical relationship, at least some of them are geographically close to MGM.

Shoplifting

Reports of shoplifting increased in Chicopee, Holyoke, and Wilbraham. They were low in Agawam and within their expected volumes everywhere else. The increases are highly localized in these communities; five stores account for about 80% of it: Home Depot on Boston Road in Wilbraham, Home Depot on Memorial Drive in Chicopee, Victoria's Secret at the Holyoke Mall, T. J. Maxx at Holyoke Crossing, and Skechers in West Springfield (although West Springfield didn't see, on the whole, a significant increase). Chicopee has a more generalized increase than the other communities, with a lot of individual stores reporting 5-7 shopliftings when they used to report 2-3. In discussions, local agencies report a major increase in organized retail theft at these locations, with suspects coming from out of state. They could not identify an MGM connection.

Extortion

The high extortion total was mostly a Springfield matter, stemming from a series of incidents in the fall of 2018. The Crime Analysis Unit reviewed the data on the cases and found a pattern of telephone scams which probably should have been coded as "Fraud/Con Games" rather than extortion.

Pornography

Springfield, East Longmeadow, and Holyoke all reported pornography increases. All evidence points to a trend of local students sharing under-aged selfies and getting recipients in trouble for possessing them.

Trespassing

Chicopee, Holyoke, and Northampton all reported high trespassing totals, all for different reasons that do not seem to have anything to do with MGM. See the individual city analyses.

Selected calls for service reported to region, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	558	84	T	739–1047	976	Expected
Disabled Vehicle	2591	114	T	2517–3575	3001	Expected
Disturbance	24528	443	T	23806–28797	25035	Expected
Domestic Dispute	11271	113	T	11133–12316	10800	Low
General Service	18395	-692	T	11835–20348	18152	Expected
Gunshots	1129	-63	C	792–1466	1099	Expected
Hunting	27	-2	T	14–32	23	Expected
Liquor	446	-12	C	384–508	329	Low
Lost Property	666	2	C	617–715	550	Low
Medical	22665	978	T	22644–30513	25514	Expected
Overdose	2294	657	T	4356–5153	4360	Expected
Psychological	18623	174	C	16907–20339	17611	Expected
Suspicious Activity	16200	685	T	17000–20882	18388	Expected
Traffic Collision	4663	453	T	5089–7859	5271	Expected
Traffic Complaint	434	11	C	347–521	463	Expected
Vagrancy	558	84	T	739–1047	976	Expected

There were no regional increases in the major call-for-service categories, although some of the individual cities

Collisions reported to region, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	7625	336	T	7928–10013	8798	Expected
Parked vehicle	1669	87	T	1807–2227	2109	Expected
Pedestrian	286	1	C	255–317	291	Expected
Bicyclist	146	-2	C	128–164	117	Low
Animal	125	13	T	131–223	185	Expected
Fixed object	894	57	T	1024–1220	1055	Expected
Curb/barrier	461	12	T	444–577	516	Expected
Rollover/Jackknife	49	0	C	43–55	56	High
Other/Unknown	289	-16	T	180–280	265	Expected
Total	11543	488	T	12158–14835	13392	Expected

Although total crashes in the region were expected compared to the norm (with the exception of rollover/jackknife crashes), a map of changes by individual street segments do show patterns that could be attributed to the presence of MGM. In Springfield, crashes were higher on streets directly around the casino, north in the Metro Center, southeast in Forest Park, and east in Old Hill. East Longmeadow, Wilbraham, Agawam, and West Springfield all showed increases on some intersections and state routes that could plausibly feed traffic to MGM.

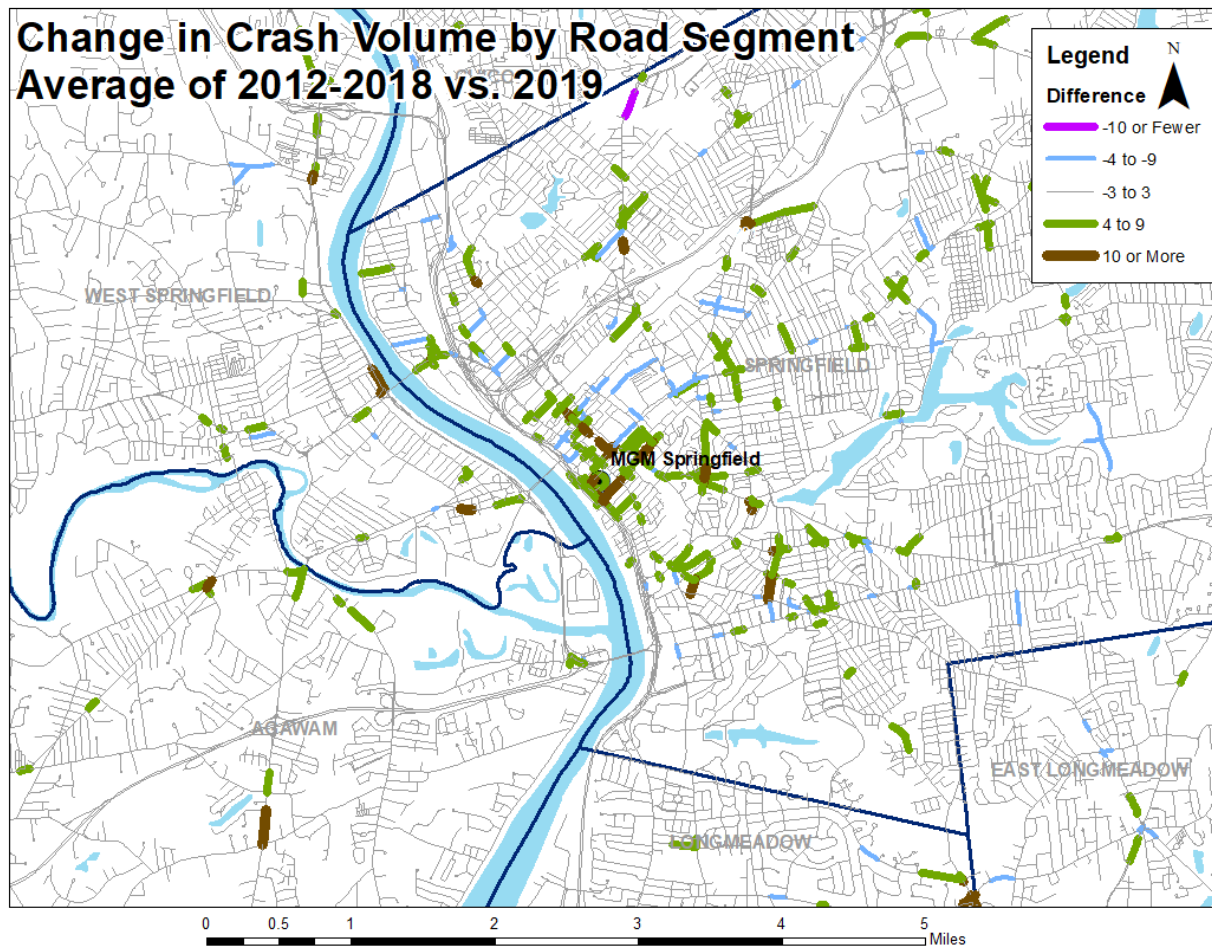


Figure 7: Analysis of changes in crashes by road segment shows a definite MGM influence in Springfield and on feeder roads from other communities.

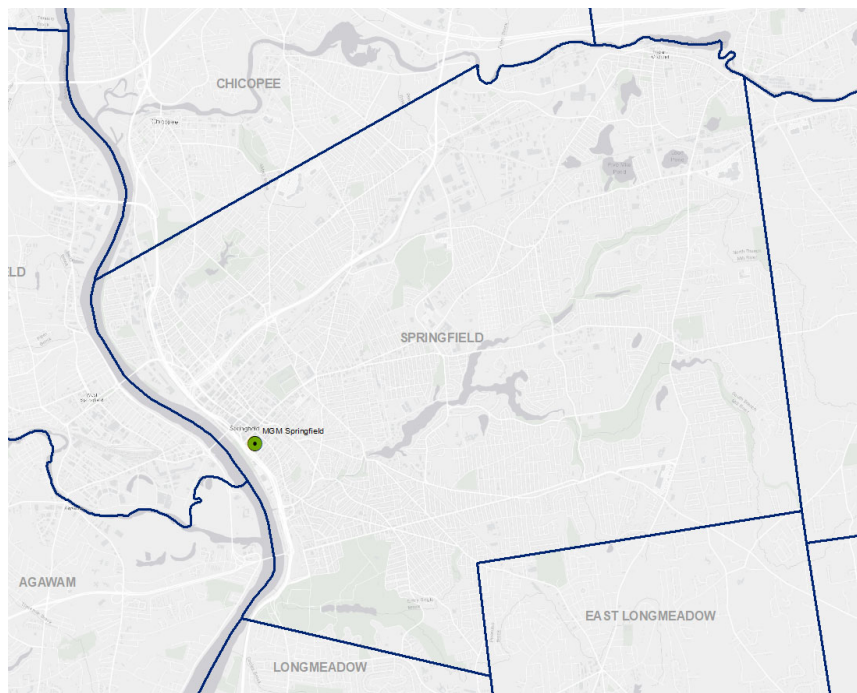
Summary of crimes in each community, 1 September–31 August

H=High E=Expected L=Low

Category	SP	AG	CH	EL	HA	HO	LO	LU	NH	WS	WI	ALL
Murder	E	E	E	E	E	E	E	E	E	E	E	E
Sexual Assault	E	E	L	E	E	H	E	E	E	E	H	E
Kidnapping	H	E	E	E	E	E	E	E	E	E	E	E
Robbery	E	E	E	H	E	L	E	E	E	L	E	E
Aggravated Assault	E	E	E	E	E	L	E	E	L	E	E	E
Simple Assault	E	H	E	E	E	E	E	H	E	E	E	E
Threats	E	E	L	E	E	L	E	E	E	E	E	E
Arson	E	E	E	E	E	L	E	E	E	E	E	E

Category	SP	AG	CH	EL	HA	HO	LO	LU	NH	WS	WI	ALL
Burglary	E	E	E	L	E	L	E	E	E	E	E	E
Theft from Persons	E	E	E	E	E	H	E	E	L	E	E	E
Purse-Snatching	H	E	H	E	E	H	E	E	E	E	E	H
Shoplifting	E	L	H	E	E	H	E	E	E	E	H	H
Theft from Building	E	L	L	L	E	H	E	L	L	L	L	E
Theft from Machine	L	E	E	E	E	E	E	E	E	E	E	E
Theft from Vehicle	H	E	L	H	E	L	H	E	L	E	E	E
Theft of MV Parts	E	E	L	E	E	E	E	E	E	E	L	E
Other Theft	E	L	H	E	L	L	E	E	E	E	E	E
Auto Theft	E	L	L	E	E	E	H	L	H	E	E	L
Forgery	H	E	E	E	E	E	E	L	E	E	E	E
Fraud/Con Games	H	E	E	E	E	H	E	L	H	H	E	H
Credit Card Fraud	E	L	L	L	E	L	L	L	E	E	E	L
Identity Theft	E	L	E	E	E	E	E	L	L	E	H	E
Employee Theft	E	E	E	E	E	E	E	L	L	L	L	L
Extortion	E	E	E	E	E	E	E	E	E	E	E	H
Stolen Property	E	L	E	E	E	E	L	E	E	E	E	E
Vandalism	E	E	E	E	E	E	L	E	L	E	E	E
Drugs	L	E	E	E	E	E	L	E	E	E	L	E
Statutory Rape	L	L	H	H	E	E	E	L	E	E	E	E
Pornography	H	E	E	H	E	H	E	E	E	E	E	H
Prostitution	E	E	E	E	E	E	E	E	E	E	E	E
Weapons	E	H	E	E	E	H	E	E	E	E	E	E
Bad Checks	L	E	L	E	E	E	E	L	E	L	E	L
Disorderly	E	E	E	E	E	E	E	L	E	E	E	E
Drunk Driving	E	H	H	E	E	E	E	E	L	E	E	E
Drunkenness	E	E	H	E	E	E	E	E	E	E	E	E
Family Offenses	E	E	L	E	E	H	E	E	H	E	E	E
Liquor Laws	E	E	H	L	E	H	E	E	E	E	E	E
Trespassing	E	E	H	L	E	H	E	E	H	E	E	H
Violent Total	E	E	E	E	E	L	E	H	E	E	E	E
Property Total	H	L	E	E	L	L	L	E	E	E	E	E
Total	E	E	E	E	L	L	L	L	E	E	E	E

One-year comparison: Springfield



Population (est. 2018):
154,562

Area: 33.1 square miles

Police officers: 448

**City center distance from
MGM:** 2.77 miles

MGM's host agency is the third largest city in Massachusetts and the fourth-largest in New England. Dense, urban, low-income, and historically reporting a higher-than-average rate of crime and violence, Springfield is poised to see numerous changes from the MGM Springfield casino. The first of those—an additional 59 police officers—has already taken place (and is reflected in the total above).

MGM opened on 24 August and has averaged 10,000 to 15,000 visitors per day. It swiftly became Springfield's top location for crimes, calls for service, and arrests, even considering the fact that the State Police take most of the reports. But not even a facility with as much activity as MGM can make much of a dent in a city with so much else going on, and on Figure 7, we see the influence of MGM on the total crime trend for the year is barely perceptible, even when we include crimes at MGM itself.

At the end of the year, kidnapping, purse snatching, thefts from vehicles, forgery, fraud, and pornography were the only crimes that had significantly increased. The purse snatchings, thefts from vehicles, and forgery could plausibly be related to MGM-driven increases, but most only manifested themselves in the summer, and it's tough to say for sure without more data.

Later analysis of specific geographies in Springfield shows evidence of some crime being suppressed by the extra police presence and legitimate traffic in the Metro Center.

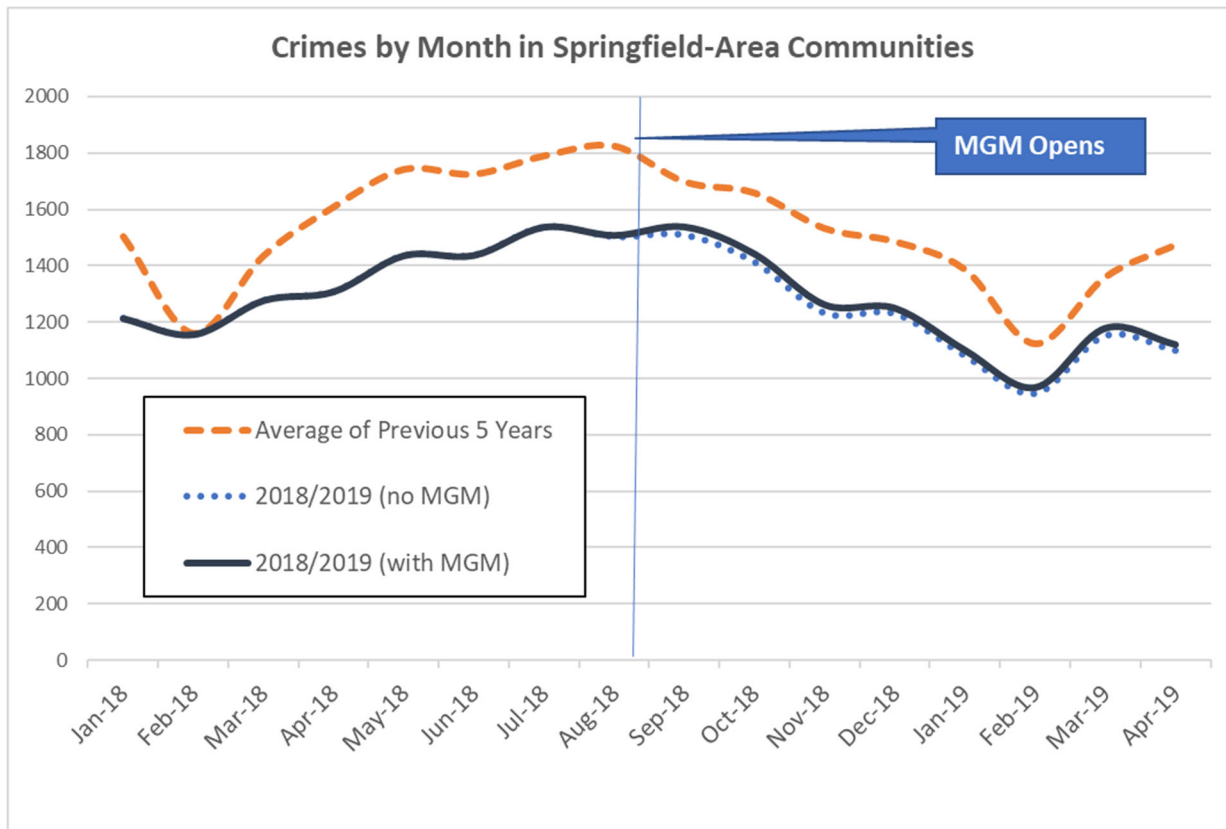


Figure 8: The opening of MGM is barely reflected in overall crime statistics, even in Springfield alone.

Crimes reported to Springfield, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	16	0	C	13–19	18	Expected
Sexual Assault	206	-9	T	137–221	206	Expected
Kidnapping	62	-2	C	49–75	77	High
Robbery	540	-17	T	357–585	402	Expected
Aggravated Assault	970	-24	T	745–1001	913	Expected
Simple Assault	3209	-94	T	2427–3241	2918	Expected
Threats	1966	-85	T	1410–1846	1593	Expected
Arson	48	-6	T	16–53	32	Expected
Burglary	1787	-262	T	810–1017	830	Expected
Theft from Persons	47	5	T	33–81	42	Expected
Purse-Snatching	12	-3	T	3–9	11	High
Shoplifting	269	34	T	301–488	351	Expected
Theft from Building	795	-75	T	316–992	646	Expected
Theft from Machine	6	3	T	9–21	8	Low
Theft from Vehicle	886	-64	T	559–852	914	High
Theft of MV Parts	188	67	T	257–470	314	Expected
Other Theft	2659	-666	T	585–1092	756	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Auto Theft	671	-49	T	406-571	465	Expected
Forgery	149	-2	C	126-172	177	High
Fraud/Con Games	241	1	C	211-271	282	High
Credit Card Fraud	122	41	T	208-331	256	Expected
Identity Theft	395	-50	T	181-342	202	Expected
Employee Theft	30	1	C	18-42	31	Expected
Extortion	10	2	T	4-35	34	Expected
Stolen Property	120	-4	T	83-129	95	Expected
Vandalism	2314	-105	T	1718-2074	1784	Expected
Drugs	636	1	C	502-770	455	Low
Statutory Rape	15	-1	C	8-22	7	Low
Pornography	17	2	T	15-33	37	High
Prostitution	50	-10	T	24-57	28	Expected
Weapons	367	22	T	368-540	428	Expected
Bad Checks	34	-2	C	24-44	8	Low
Disorderly	393	-58	T	212-356	243	Expected
Drunk Driving	59	-5	T	34-59	40	Expected
Drunkenness	6	-1	T	1-9	2	Expected
Family Offenses	116	71	T	137-489	478	Expected
Liquor Laws	49	1	C	39-59	48	Expected
Trespassing	300	39	T	311-573	454	Expected
Violent Total	6970	-232	T	5528-6558	6127	Expected
Property Total	10749	-1131	T	6086-6934	7230	High
Total	19761	-1032	T	14355-16061	15585	Expected

Kidnapping

Kidnapping can involve any number of scenarios in which one person abducts another or confines another. Although the category includes the rare stranger abduction, it more commonly consists of parental abductions or instances in which a domestic violence offender confines or restrains a victim. The latter scenario seems to make up the bulk of the kidnapping incidents in the last 12 months. 2018 showed a 5-year high for this offense, both before and after MGM opened, but 2019 so far has been normal. The Springfield Crime Analysis Unit has investigated each of the 2018 cases and finds no plausible link to MGM.

Purse snatching

An unusually high total of incidents, and five of them are within walking distance of MGM. Several of the incidents seem to involve black male suspects. Whether these incidents are part of a pattern, the proximity to MGM and the appearance of similar patterns in Chicopee and Holyoke suggest a possible MGM relationship.

Thefts from vehicles

Springfield saw an increase in nighttime thefts from cars from residential driveways in the lower part of the city, southeast of MGM. The pattern abated for a while in early 2019, perhaps thanks to extra directed patrols in the area, but it returned starting in May.



Figure 9: Five purse snatchings near MGM Springfield.

Forgery

Forged checks and counterfeit notes were high throughout the year, finally crossing the expected threshold in the final few months of 2019. This seems to be primarily a postal problem: Eleven incidents were reported at the U.S. Post Office in Forest Park, and another nine at the Post Office on State Street. As the later analysis of the Metro Center area shows, the crime was also high in the immediate neighborhood. A review of suspects shows that most known suspects were from the local area, but we do have a smattering of them from eastern Massachusetts, New York, and as far away as California.

Fraud/con games

Springfield saw a major increase in this crime type in the summer of 2019, but with few commonalities in terms of location and time. The Crime Analysis Unit reviewed the cases and did not find any patterns or any explicit MGM relationship. As with many Massachusetts communities, there seems to be an increasing trend of telephone frauds in the area.

Pornography

Springfield joins some of the other communities in a high pornography total. In contrast to those other cities, Springfield's incidents are mostly at local residences rather than schools,

Thefts from Vehicles at Residences

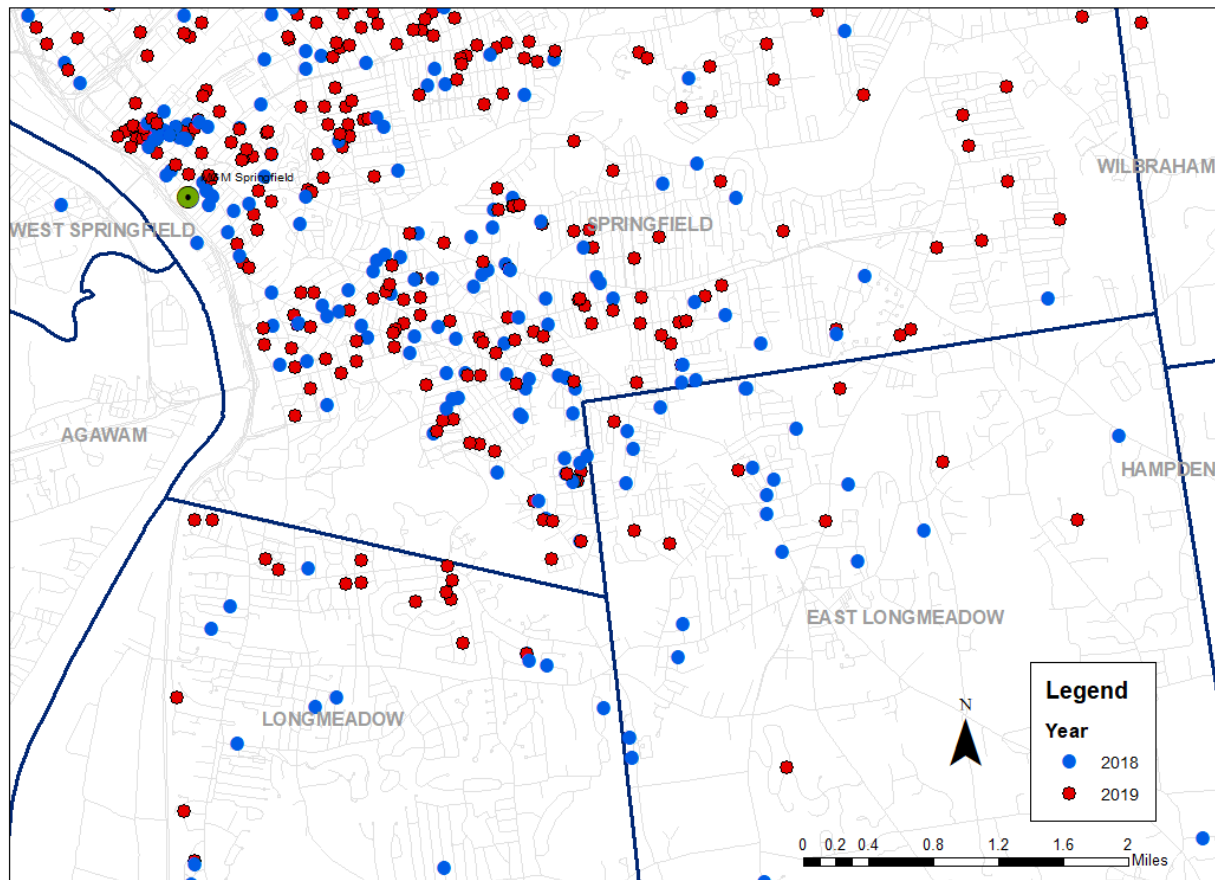


Figure 10: Nighttime thefts from cars in residential areas increased, particularly in the summer of 2019..

Selected calls for service reported to Springfield, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	378	87	T	613–818	736	Expected
Disabled Vehicle	674	39	T	682–977	859	Expected
Disturbance	12207	638	T	12855–16660	14363	Expected
Domestic Dispute	9719	60	C	9422–10016	8986	Low
Gunshots	7529	-968	T	4053–6963	5624	Expected
Medical	974	-54	C	664–1284	938	Expected
Psychological	10279	201	C	8901–11657	11027	Expected
Suspicious Activity	1891	657	T	3606–4294	3697	Expected
Traffic Collision	7596	205	T	7213–9619	7636	Expected

All of Springfield’s call-for-service types showed normal or low volume in the year after MGM opened. Increases in disabled vehicles and medical aids during the fall of 2018 and winter of 2019 did not continue into the spring and summer of 2019.

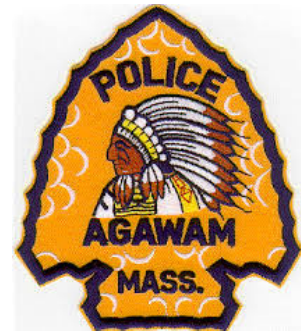
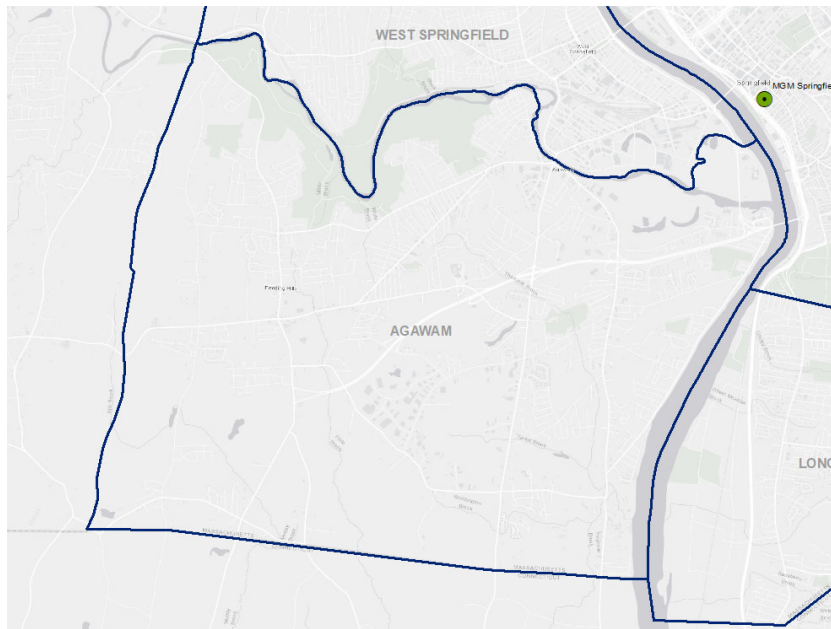
Collisions reported to Springfield, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	3020	135	T	2983–4141	3657	Expected
Parked vehicle	577	45	T	624–885	763	Expected
Pedestrian	155	1	C	135–175	167	Expected
Bicyclist	76	0	C	65–87	66	Expected
Animal	8	1	T	5–19	7	Expected
Fixed object	342	28	T	408–502	436	Expected
Curb/barrier	157	9	T	150–234	185	Expected
Rollover/Jackknife	15	0	C	11–19	8	Low
Other/Unknown	77	-6	T	43–83	42	Low
Total	4426	214	T	4593–5968	5331	Expected

A facility expected to draw several million visitors per year was naturally expected to have a traffic influence on the surrounding community. In Springfield's case, the local roads seem to have borne the extra burden well. Although total crashes did increase by about 100 over 2018, the total was consistent with the trend that Springfield was on whether the casino was built or not; the city has increased by an average of 199 collisions per year between 2011 and 2018.

Springfield's accident totals clash a bit with Figure 3 (earlier in the report), which shows increases in collisions by street segment and highlights many of those segments directly around MGM. It's possible that MGM did have an influence on the number of accidents in its immediate vicinity while still not appreciably increasing overall accident totals.

One-year comparison: Agawam



Population (est. 2018): 28,839

Area: 24.2 square miles

Police officers: 50

City center distance from MGM: 7.97 miles

Just across the river from the new casino, Agawam’s northeast corner practically touches MGM Springfield. There is some evidence that, like West Springfield, Agawam’s increase in traffic collisions in 2018 can be at least partly attributed to the extra traffic brought by MGM. For crime, however, the agency had little that suggested an MGM nexus. The agency is one of several experiencing an increase in domestic violence, which has an uncertain casino connection.

Crimes reported to Agawam, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	0	0	T	0–0	0	Expected
Sexual Assault	14	0	C	9–19	16	Expected
Kidnapping	1	0	C	0–3	1	Expected
Robbery	8	2	T	8–20	12	Expected
Aggravated Assault	48	8	T	65–93	74	Expected
Simple Assault	141	19	T	192–238	248	High
Threats	40	8	T	46–90	65	Expected
Arson	2	0	C	0–4	0	Expected
Burglary	148	18	T	142–280	147	Expected
Theft from Persons	1	0	C	0–3	2	Expected
Purse-Snatching	2	0	C	0–4	2	Expected
Shoplifting	20	5	T	22–50	14	Low
Theft from Building	30	5	T	34–55	32	Low
Theft from Machine	0	0	C	0–0	0	Expected
Theft from Vehicle	7	-1	C	2–15	10	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft of MV Parts	4	1	C	0-10	4	Expected
Other Theft	219	26	T	262-351	198	Low
Auto Theft	33	0	C	27-39	18	Low
Forgery	18	2	T	13-35	20	Expected
Fraud/Con Games	40	7	T	54-75	66	Expected
Credit Card Fraud	13	2	T	18-24	4	Low
Identity Theft	30	10	T	57-75	53	Low
Employee Theft	3	0	C	0-7	0	Expected
Extortion	1	0	T	0-4	3	Expected
Stolen Property	17	2	T	18-29	13	Low
Vandalism	106	17	T	124-216	173	Expected
Drugs	40	-7	T	21-35	33	Expected
Statutory Rape	7	2	T	11-15	4	Low
Pornography	3	1	T	3-8	7	Expected
Prostitution	1	0	C	0-2	0	Expected
Weapons	7	1	C	4-10	11	High
Bad Checks	5	1	T	4-11	7	Expected
Disorderly	41	-7	T	14-34	33	Expected
Drunk Driving	33	-3	T	17-39	42	High
Drunkenness	7	1	C	0-15	1	Expected
Family Offenses	31	1	C	2-112	7	Expected
Liquor Laws	14	-3	T	4-14	10	Expected
Trespassing	19	-1	C	12-26	18	Expected
Violent Total	252	36	T	353-439	416	Expected
Property Total	694	95	T	859-1183	759	Low
Total	1155	79	T	1039-2028	1348	Expected

Simple Assault

Simple assaults have been on an upward trend in Agawam, starting at 84 in 2012 and gaining about 19 per year to reach highs of nearly 200 in 2017 and 2018. But in 2019, it shot up to 249, about 35 more than expected even given the past trend. Incidents are evenly split between domestic and non-domestic assaults (based on crime code). About a third of the increase is represented by a nursing facility, but the rest are spread throughout the town. Note that domestic disputes (calls for service without violence) were at the high end of their expected range during this period. Agawam is alone in reporting such increases, however, diminishing the likelihood of any MGM connection.

Weapons

A sudden spate of firearm and ammunition seizures between March and July of 2019 show few commonalities.

Drunk driving

Agawam was the only agency to report a significant increase in drunk driving arrests. The increase came entirely between February and May of 2019 between 10:00 PM and 1:00 AM, although not geographically concentrated. As alcohol-related crashes have not increased during the same period, and no other agencies are reporting similar increases, this trend is likely related to police practice.

Selected calls for service reported to Agawam, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Disabled Vehicle	330	27	T	308–555	478	Expected
Disturbance	431	1	C	373–489	399	Expected
Domestic Dispute	312	-19	T	178–336	333	Expected
General Service	1110	98	T	1214–1789	1785	Expected
Hunting	21	-2	T	11–19	10	Low
Lost Property	15	3	T	12–38	40	High
Medical	1637	115	T	1629–2549	1991	Expected
Psychological	17	2	T	14–39	15	Expected
Suspicious Activity	1324	46	C	1103–1545	1415	Expected
Traffic Collision	829	40	T	873–1108	883	Expected
Traffic Complaint	365	10	C	315–415	435	High

Lost property

A particularly high spring and summer of 2019 increased this category overall for the year. There are no duplicate locations, which is about all that can be determined from the fairly limited data associated with this call type.

Traffic complaints

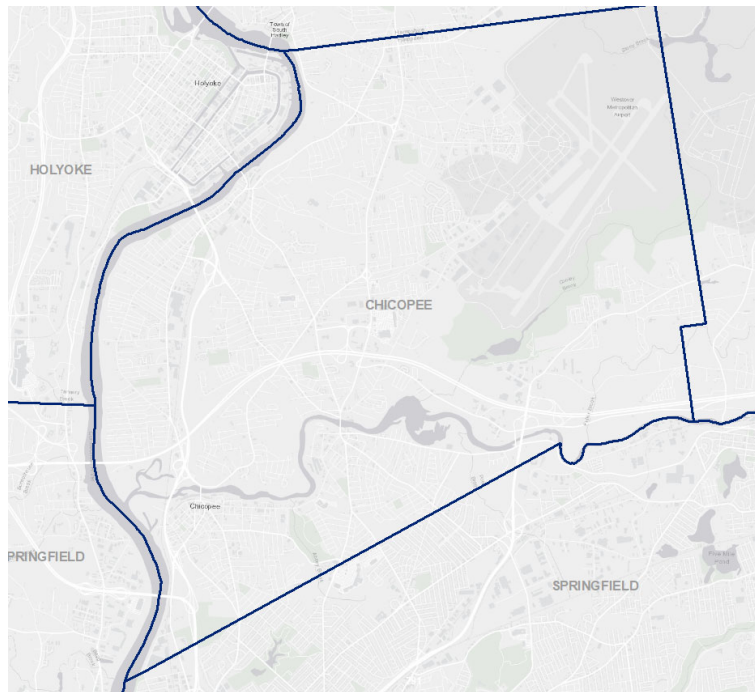
The bulk of the increase can be traced to Springfield Street (+19 from the average). Other streets with increases include Franklin Street (+9), South Westfield Street (+8), and Kensington Street (+8).

Collisions reported to Agawam, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	373	15	T	387–480	469	Expected
Parked vehicle	45	4	T	54–69	101	High
Pedestrian	8	-1	T	4–9	5	Expected
Bicyclist	5	-1	C	2–8	1	Low
Animal	5	0	C	2–8	8	Expected
Fixed object	52	5	T	53–89	85	Expected
Curb/barrier	29	2	T	28–44	45	High
Rollover/Jackknife	4	0	C	1–7	6	Expected
Other/Unknown	14	1	C	9–19	26	High
Total	535	25	T	565–706	746	High

Like nearby West Springfield, Agawam had a higher-than-expected collision total for the year post-MGM, with the brunt of the increase seen on Springfield Street (+46 from average), Main Street (+22), Suffield Street (+19), and North Westfield Street (+9), all of which serve as major arteries through the town.

One-year comparison: Chicopee



Population (est. 2018): 56,255

Area: 23.9 square miles

Police officers: 134

City center distance from MGM:
5.52 miles

In some ways a northern extension of Springfield, Chicopee has long experienced higher-than-average crimes rates, although the city saw a significant reduction in crimes in the 2000s and has maintained that reduction through the 2010s. Prior to MGM opening, we hypothesized that MGM might see increases at businesses, restaurants, and hotels on travel routes to MGM, but so far such trends have not surfaced. But we have seen increases in purse snatchings, shoplifting, and other theft in general, plus a couple of alcohol-related categories.

Crimes reported to Chicopee, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	1	0	T	0–5	1	Expected
Sexual Assault	63	4	T	53–103	51	Low
Kidnapping	14	2	C	6–23	13	Expected
Robbery	65	-2	C	47–83	67	Expected
Aggravated Assault	163	7	T	143–237	230	Expected
Simple Assault	725	34	T	647–1072	686	Expected
Threats	328	33	T	332–583	324	Low
Arson	3	-1	T	0–3	3	Expected
Burglary	421	-28	T	261–414	317	Expected
Theft from Persons	6	1	C	2–10	6	Expected
Purse-Snatching	7	0	C	3–11	16	High
Shoplifting	167	-3	C	134–200	216	High
Theft from Building	190	-10	T	114–199	90	Low
Theft from Machine	0	0	C	0–0	0	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft from Vehicle	167	18	T	112–367	60	Low
Theft of MV Parts	124	-6	C	98–150	13	Low
Other Theft	331	18	T	324–481	601	High
Auto Theft	126	7	T	117–192	98	Low
Forgery	47	-2	C	33–61	43	Expected
Fraud/Con Games	165	0	C	123–207	149	Expected
Credit Card Fraud	24	-2	T	14–26	9	Low
Identity Theft	96	10	T	86–186	171	Expected
Employee Theft	11	0	C	6–16	6	Expected
Extortion	2	0	C	0–5	5	Expected
Stolen Property	33	-1	C	23–43	24	Expected
Vandalism	487	-4	C	408–566	464	Expected
Drugs	96	-4	C	74–118	96	Expected
Statutory Rape	12	1	C	6–19	30	High
Pornography	9	3	T	13–33	14	Expected
Prostitution	2	0	C	0–5	0	Expected
Weapons	34	3	T	28–61	54	Expected
Bad Checks	11	-1	C	7–15	4	Low
Disorderly	77	-1	C	58–96	94	Expected
Drunk Driving	46	3	T	46–68	84	High
Drunkenness	96	-8	T	52–86	92	High
Family Offenses	1	0	T	1–2	0	Low
Liquor Laws	15	2	T	13–34	47	High
Trespassing	43	-2	T	29–47	51	High
Violent Total	1358	77	T	1268–2063	1372	Expected
Property Total	2407	-3	C	2134–2680	2291	Expected
Total	4209	231	T	3720–6054	4229	Expected

Purse Snatching

Chicopee’s increase is centered at Chicopee Marketplace on Memorial Drive. Reports show someone stealing purses from female shoppers at Dollar Tree, Wal-Mart, Marshall’s, and Five Below. One suspect has been identified: a 27-year-old homeless woman.

Shoplifting

Chicopee suffered a shoplifting increase at its Marketplace, with Walmart, Big Y, and Home Depot all reporting about twice their average incidents. Various CVS stores in town also contributed higher-than-average totals.

Other theft

Miscellaneous thefts began increasing in Chicopee starting in November 2018—about the same time that other theft categories started to decrease. The Walmart on Memorial Drive accounts for about one-third of the increase. Unfortunately, these facts suggest that the “increase” is simply greater use of the “other theft” code to record crimes that would be better recorded as shopliftings, thefts from persons, thefts from vehicles, and so forth. We would ask the agency to review its use of this code.

Statutory rape

The agency experienced a startling increase in this crime in the beginning of 2019, with 26 incidents recorded between January and August. Confidentiality requirements prohibit too much discussion of this category, but there is no logical relation between the crime and the presence of a casino, particularly when most of the offenders and victims seem to be local teenagers.

Drunk Driving

Chicopee nearly doubled its normal number of drunk driving arrests and summonses in the post-MGM year. The increase was spread throughout the year, but concentrated between 21:00 and 03:00. The incidents are scattered about the west side of town and while many of them could plausibly be on MGM routes, there is no particular concentration in that direction. Given the similar increase in "open container" charges (see "Liquor Laws" below) during the same period, the evidence suggests a period of intensified traffic enforcement by the Chicopee Police rather than more drunk driving *per se*, particularly since no other agency reported a similar increase.

Drunkenness

Chicopee's increase in this category isn't so much an increase as a reversal of a decrease. From 2012 to 2018, incidents of protective custodies (which make up almost all of this category) decreased steadily, only to reverse in 2019. There are few common locations, and most of the increases is at residences. These facts, plus the lack of a similar increase in other communities, suggests the increase is unrelated to MGM.

Liquor Laws

Chicopee was the only agency to report a significant increase in this offense type. All but five of the offenses involved open containers of liquor in stopped vehicles, suggesting an increase in traffic enforcement rather than a real increase in consumption of alcohol.

Trespassing

The increase is tied entirely to two addresses: the Walmart at 591 Memorial Drive and the Shell gas station at 95 West Street. In neither case is there any reason to think there is any MGM involvement.

Selected calls for service reported to Chicopee, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	39	3	C	23–55	100	High
Disabled Vehicle	420	47	T	393–821	550	Expected
Disturbance	3329	66	C	3011–3647	2886	Low
General Service	2242	181	T	2010–3923	2993	Expected
Medical	1717	214	T	1680–3470	3029	Expected
Overdose	87	52	T	117–449	207	Expected
Suspicious Activity	1817	116	T	1659–2905	2022	Expected
Traffic Collision	2310	196	T	2337–3846	2600	Expected
Traffic Complaint	1918	387	T	2196–4739	2136	Low

Abandoned Vehicle

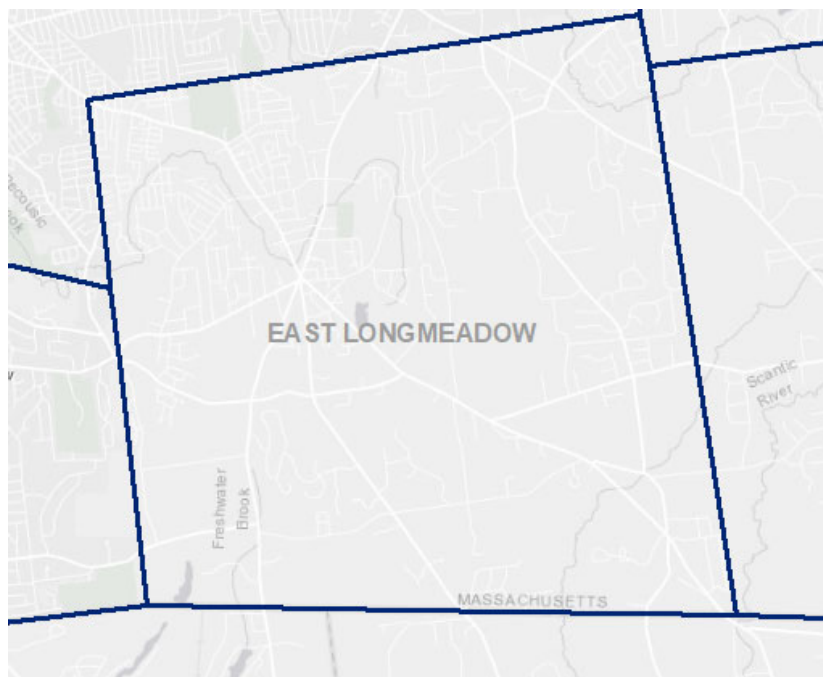
The agency saw an unusual spike in these calls starting in December, but not in a way that is spatially or logically related to MGM Springfield.

Collisions reported to Chicopee, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	1126	126	T	1246–2010	1325	Expected
Parked vehicle	326	28	T	315–564	426	Expected
Pedestrian	36	1	C	29–43	37	Expected
Bicyclist	17	0	C	12–22	17	Expected
Animal	6	2	T	5–19	23	High
Fixed object	123	10	T	133–195	147	Expected
Curb/barrier	74	5	C	48–100	73	Expected
Rollover/Jackknife	10	1	T	7–19	8	Expected
Other/Unknown	44	1	C	34–54	53	Expected
Total	1763	173	T	1879–3032	2109	Expected

Chicopee’s collisions have been increasing steadily since 2012. Although the 2019 figure did not reverse this trend, it was well within the expected window for all categories, and unusually low for miscellaneous crashes. In the street-based analysis shown in Figure 7, Chicopee only had a couple of streets with higher-than average totals and none of them in an obvious “feed” route to MGM. Given the similar lack of an increase in call-for-service statistics, it seems that if Chicopee is experiencing higher traffic volume because of MGM, it is most likely not reflected on local roads.

One-year comparison: East Longmeadow



Population (est. 2018): 16,288

Area: 13.0 square miles

Police officers: 27

City center distance from MGM:
5.28 miles

As with most communities in this study, we did not see any major increases on travel routes through the town. However, we did see some thefts spill over the soft northern border that the community shares with Springfield; see below for an analysis of that pattern. An increase in domestic assaults seen in the last four months of 2018 did not continue into 2019. Most other calls for service and traffic collisions came in at expected volumes.

Crimes reported to East Longmeadow, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	0	0	C	0–1	1	Expected
Sexual Assault	7	0	C	2–13	4	Expected
Kidnapping	1	0	C	0–2	1	Expected
Robbery	2	0	C	0–4	6	High
Aggravated Assault	17	-1	C	8–27	18	Expected
Simple Assault	61	-6	T	30–61	61	Expected
Threats	53	-13	T	17–31	31	Expected
Arson	1	0	C	0–2	1	Expected
Burglary	52	-4	T	27–58	22	Low
Theft from Persons	2	0	C	0–4	1	Expected
Purse-Snatching	3	0	C	1–5	2	Expected
Shoplifting	53	-2	C	38–68	44	Expected
Theft from Building	27	-1	C	16–38	13	Low
Theft from Machine	0	0	C	0–0	0	Expected
Theft from Vehicle	38	-5	T	18–39	45	High
Theft of MV Parts	6	-3	T	0–3	1	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Other Theft	105	-2	C	89–121	98	Expected
Auto Theft	12	0	C	8–16	14	Expected
Forgery	7	0	C	4–10	7	Expected
Fraud/Con Games	37	-4	T	18–38	37	Expected
Credit Card Fraud	12	-1	C	8–16	6	Low
Identity Theft	13	-1	C	8–18	17	Expected
Employee Theft	3	0	C	0–6	4	Expected
Extortion	0	0	C	0–2	2	Expected
Stolen Property	9	-1	C	3–15	5	Expected
Vandalism	107	-17	T	50–91	53	Expected
Drugs	39	-8	T	13–25	15	Expected
Statutory Rape	3	0	C	1–5	10	High
Pornography	3	-1	T	1–2	9	High
Prostitution	0	0	C	0–1	0	Expected
Weapons	7	0	C	3–11	8	Expected
Bad Checks	5	-1	C	0–10	0	Expected
Disorderly	19	-3	T	7–14	9	Expected
Drunk Driving	27	0	C	21–33	23	Expected
Drunkenness	6	0	C	2–10	3	Expected
Family Offenses	1	-1	T	0–1	1	Expected
Liquor Laws	14	-1	C	9–19	5	Low
Trespassing	19	-1	C	9–29	5	Low
Violent Total	142	-19	T	68–127	122	Expected
Property Total	488	-42	T	317–443	372	Expected
Total	773	-47	T	313–764	582	Expected

Robbery

The same bank—People’s United—was robbed twice in the same week in May 2019, contributing to a slight increase in this category. Two men from the Springfield area were ultimately charged; their histories show previous bank robberies and no gambling nexus. Other incidents include a carjacking at Stop and Shop in February and a July robbery at a bicycle shop.

Thefts from vehicles

In the four months after MGM Springfield opened, East Longmeadow saw an increase in thefts from vehicles from residential driveways, plus miscellaneous residential thefts (the data is unclear, but I suspect sheds, yards, open garages, anything short of a burglary), mostly but not universally at night, targeting primarily wallets and purses with cash and credit cards. Among the incidents were several one-night sprees in which multiple residences were hit on the same evening. The two crimes together amounted to about 46 cases in the last four months of 2018 in East Longmeadow, and the pattern also affected Longmeadow and Springfield.

The pattern went dormant for the January–April period. (Springfield and Longmeadow reported extra patrols in their affected areas) but came back to life from May to August, affecting the same neighborhood in the northwest quadrant of the city. These nighttime incidents primarily focus on wallets, purses, cash, and credit cards. No arrests have been made that I’m aware of. A map of the incidents is found in Springfield’s section.

The trend did not continue into 2019, but the lingering effects from 2018 kept East Longmeadow's statistics high for the eight-month period.

Statutory rape

East Longmeadow saw a doubling of this offense type. Offenders and victims seem to be from local communities, lessening the likelihood of any MGM connection.

Pornography

The agency took six reports of child pornography during this period plus three reports of distributing pornographic material to a minor. As with other communities reporting this increase, many of the incidents are at area schools and suggest teenagers engaged in an unfortunate selfie/SnapChat/"sexting" trend rather than anything connected with MGM.

Selected calls for service reported to East Longmeadow, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Disabled Vehicle	54	-2	C	33–75	14	Low
Disturbance	47	1	C	27–67	33	Expected
Domestic Dispute	81	32	T	136–221	178	Expected
General Service	1239	-32	C	1016–1462	1414	Expected
Liquor	4	-1	C	1–8	0	Low
Lost Property	35	-5	T	7–32	4	Low
Medical	1751	100	T	2041–2262	1488	Low
Suspicious Activity	1040	3	C	948–1132	810	Low
Traffic Collision	527	-1	C	480–574	485	Expected
Traffic Complaint	4	-2	T	0–6	2	Expected
Vagrancy	7	-3	T	1–6	0	Low

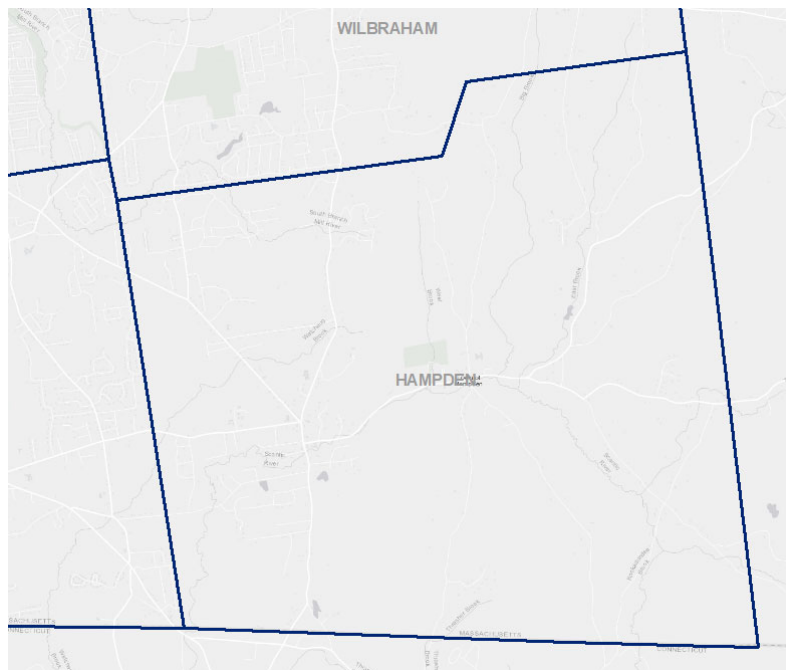
East Longmeadow's call for service types were all low or within expected volumes for the one year post-MGM. An increase in "general service" calls seen during the first 8 months of the period diminished in the final four months to bring the category within its range, if at the high end.

Collisions reported to East Longmeadow, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	322	4	C	291–353	314	Expected
Parked vehicle	78	-1	C	67–89	74	Expected
Pedestrian	5	0	C	3–7	7	Expected
Bicyclist	3	0	C	1–5	2	Expected
Animal	25	0	C	17–33	22	Expected
Fixed object	45	1	C	38–52	51	Expected
Curb/barrier	18	-1	C	14–22	19	Expected
Rollover/Jackknife	2	0	C	1–4	7	High
Other/Unknown	28	-7	T	6–21	10	Expected
Total	527	-5	C	482–572	506	Expected

Collisions in East Longmeadow were on the lower end of normal for the study period, with the exception of the “rollover/jackknife” category, showed an unusually high (compared to the norm) total on weekdays, with most of the incidents on days of inclement weather. We’ll continue to monitor this category, but the fact that it didn’t increase elsewhere suggests that it’s more likely a fluke than a new trend.

One-year comparison: Hampden



Population (est. 2018): 5,217

Area: 19.7 square miles

Police officers: 11

City center distance from MGM:
9.06 miles

The most geographically isolated of the 11 communities in this study (the town has no highways, major state routes, or PVRTA bus routes), it was always a long shot that this low-crime community would see much activity post-MGM. During the year after MGM opened, the agency saw expected volumes of violent crimes and set a 10-year low (at least) for both property crime and total crime. It had no significant increases in any crime category. The only calls for service to see significant increases were hunting-related calls and medical aids, and traffic collisions were normal in all categories.

Crimes reported to Hampden, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	0	0	C	0-0	0	Expected
Sexual Assault	0	0	C	0-1	0	Expected
Kidnapping	0	0	C	0-0	0	Expected
Robbery	0	0	T	0-1	0	Expected
Aggravated Assault	3	0	C	0-6	1	Expected
Simple Assault	9	1	C	5-13	7	Expected
Threats	5	0	C	2-8	2	Expected
Arson	0	0	C	0-0	0	Expected
Burglary	13	-2	T	2-18	6	Expected
Theft from Persons	0	0	C	0-0	0	Expected
Purse-Snatching	0	0	C	0-0	0	Expected
Shoplifting	0	0	C	0-1	0	Expected
Theft from Building	7	-2	T	2-8	4	Expected
Theft from Machine	0	0	C	0-0	0	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft from Vehicle	8	1	T	6-18	7	Expected
Theft of MV Parts	0	0	C	0-0	0	Expected
Other Theft	23	0	C	13-33	7	Low
Auto Theft	5	1	C	0-10	2	Expected
Forgery	1	0	T	0-2	1	Expected
Fraud/Con Games	3	0	C	2-4	4	Expected
Credit Card Fraud	0	0	C	0-1	0	Expected
Identity Theft	3	0	C	0-6	4	Expected
Employee Theft	0	0	C	0-0	0	Expected
Extortion	0	0	C	0-0	0	Expected
Stolen Property	2	0	T	1-2	1	Expected
Vandalism	23	-2	C	14-32	15	Expected
Drugs	3	-1	T	1-4	1	Expected
Statutory Rape	0	0	C	0-0	0	Expected
Pornography	1	0	C	0-2	0	Expected
Prostitution	0	0	C	0-0	0	Expected
Weapons	1	0	C	0-3	2	Expected
Bad Checks	1	0	C	0-3	0	Expected
Disorderly	2	-1	T	0-2	1	Expected
Drunk Driving	12	-1	T	5-16	10	Expected
Drunkenness	3	-1	T	0-3	3	Expected
Family Offenses	0	0	C	0-0	0	Expected
Liquor Laws	7	-1	C	3-11	7	Expected
Trespassing	4	0	C	0-9	1	Expected
Violent Total	17	0	C	10-24	10	Expected
Property Total	89	-4	C	67-111	51	Low
Total	141	-6	C	120-162	86	Low

Hampden reported some of its lowest crime totals in a decade, showing no influence from MGM or indeed any other influences.

Selected calls for service reported to Hampden, 1 September-31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	3	0	C	0-6	1	Expected
Disabled Vehicle	36	-1	C	24-48	30	Expected
Disturbance	41	-5	T	20-34	35	High
Domestic Dispute	25	-2	C	15-35	17	Expected
General Service	897	7	C	811-983	851	Expected
Hunting	3	-1	T	0-4	5	High
Medical	299	2	C	259-339	343	High
Suspicious Activity	204	-12	T	128-222	172	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Traffic Collision	82	2	C	67-97	73	Expected
Traffic Complaint	12	1	C	3-21	10	Expected

Disturbance

Hampden saw an increase in this category starting in May 2019 and continuing through August. Other than a couple of repeat calls to addresses on Somers Road, Allen Street, and Baldwin Drive, I don't see any similarities in these incidents coded as "general disturbances."

Hunting

Hampden joins nearby Wilbraham in an increase in hunting-related complaints, heavily focused in December 2018. There is otherwise no time, day, or geographic concentration, nor any more hints in the CAD data about why such calls were unusually high last year. The increase was only in the last four months of the year; there were no complaints before September or after December.

Medical aids

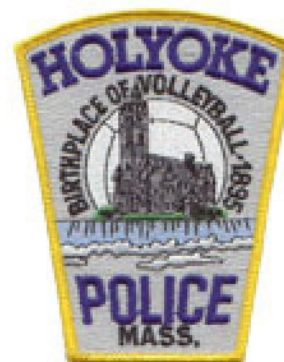
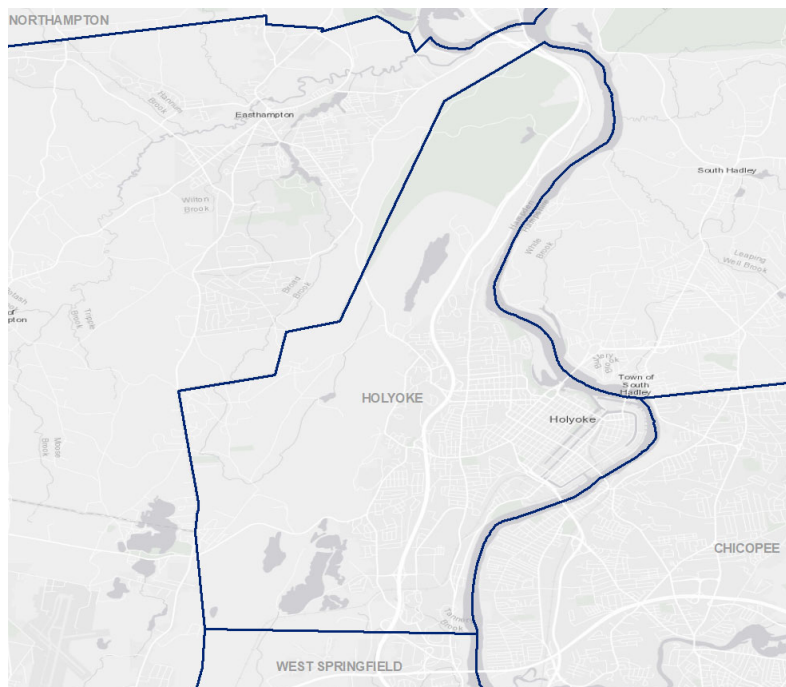
An increase in medical aid calls can often be the sign of extra people entering a community. However, in this case such an increase is uncorroborated with other call types. The increase seems driven by a handful of residences that had multiple calls in 2019.

Collisions reported to Hampden, 1 September-31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	18	1	T	19-28	17	Low
Parked vehicle	8	0	C	5-11	8	Expected
Pedestrian	0	0	C	0-1	0	Expected
Bicyclist	1	0	C	0-3	3	Expected
Animal	13	2	T	8-35	10	Expected
Fixed object	16	1	C	13-19	14	Expected
Curb/barrier	5	-1	C	2-9	1	Low
Rollover/Jackknife	1	0	C	0-2	1	Expected
Other/Unknown	4	-1	T	2-6	4	Expected
Total	66	3	C	50-82	58	Expected

Hampden had no discernible increase in any collision type during the year post-MGM. Totals for all categories were expected based on past trends, and tended toward the lower end of their ranges.

One-year comparison: Holyoke



Population (est. 2018): 40,451

Area: 22.8 square miles

Police officers: 119

City center distance from MGM:
7.97 miles

Holyoke is the only participating city that had significant decreases in violent crime, property crime, and total crime, even as some individual categories increased. Those increases are analyzed below, but it's important to keep in mind that Holyoke seems to have embarked on a mission to improve its coding in 2019, and so many of the increases may just be shifts from historically bad codes to correct ones.

Holyoke has a lot of bars, restaurants, hotels, convenience stores, and gas stations that might ultimately see an increase in activity from MGM patrons, but this has not been reflected in the statistics so far. We will continue to monitor.

Crimes reported to Holyoke, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	3	0	C	1–5	4	Expected
Sexual Assault	32	0	C	23–41	42	High
Kidnapping	8	-1	T	4–9	5	Expected
Robbery	96	-1	C	77–115	59	Low
Aggravated Assault	269	12	T	281–353	222	Low
Simple Assault	799	-16	T	626–849	649	Expected
Threats	410	-5	C	369–451	334	Low
Arson	12	0	C	7–17	5	Low
Burglary	390	-32	T	241–319	212	Low
Theft from Persons	0	0	C	0–0	3	High
Purse-Snatching	1	0	C	0–2	7	High
Shoplifting	507	-44	T	298–426	444	High

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft from Building	15	0	C	6–24	26	High
Theft from Machine	0	0	C	0–0	0	Expected
Theft from Vehicle	230	-20	T	139–223	121	Low
Theft of MV Parts	12	-5	T	2–8	2	Expected
Other Theft	1248	-67	T	830–1134	670	Low
Auto Theft	121	1	C	104–138	113	Expected
Forgery	36	-2	C	20–52	35	Expected
Fraud/Con Games	5	1	T	6–12	65	High
Credit Card Fraud	49	0	C	41–57	40	Low
Identity Theft	0	0	C	0–0	3	Expected
Employee Theft	1	0	C	0–3	0	Expected
Extortion	2	0	C	0–4	2	Expected
Stolen Property	63	0	C	50–76	58	Expected
Vandalism	896	-61	T	548–847	566	Expected
Drugs	567	-12	T	447–594	467	Expected
Statutory Rape	0	0	C	0–0	9	Expected
Pornography	4	1	T	3–9	12	High
Prostitution	2	-1	T	0–3	0	Expected
Weapons	77	3	C	63–91	111	High
Bad Checks	0	0	C	0–2	2	Expected
Disorderly	199	-13	T	130–202	165	Expected
Drunk Driving	41	-1	C	22–60	50	Expected
Drunkenness	0	0	C	0–0	0	Expected
Family Offenses	1	0	C	0–3	7	High
Liquor Laws	4	-1	T	2–3	8	High
Trespassing	76	-44	T	0–39	113	High
Violent Total	1617	-10	C	1549–1685	1315	Low
Property Total	3589	-229	T	2413–2936	2372	Low
Total	6177	-190	T	4931–5535	4631	Low

Sexual assault

This category was slightly higher than normal, particular in June 2019, which reported 11 of the incidents. There seem to be no commonalities by location or other factors supplied, but a thorough analysis of these reports by the agency will be necessary to determine if there are any commonalities.

Thefts from persons and purse snatchings

These offense categories are often confused, and it seemed to make sense to report on them together since Holyoke had a high incidence of both, with almost all reports between May and July of 2019. There is a clear geographic pattern (if not a temporal one—the times are all over the place) in downtown Holyoke during these months.

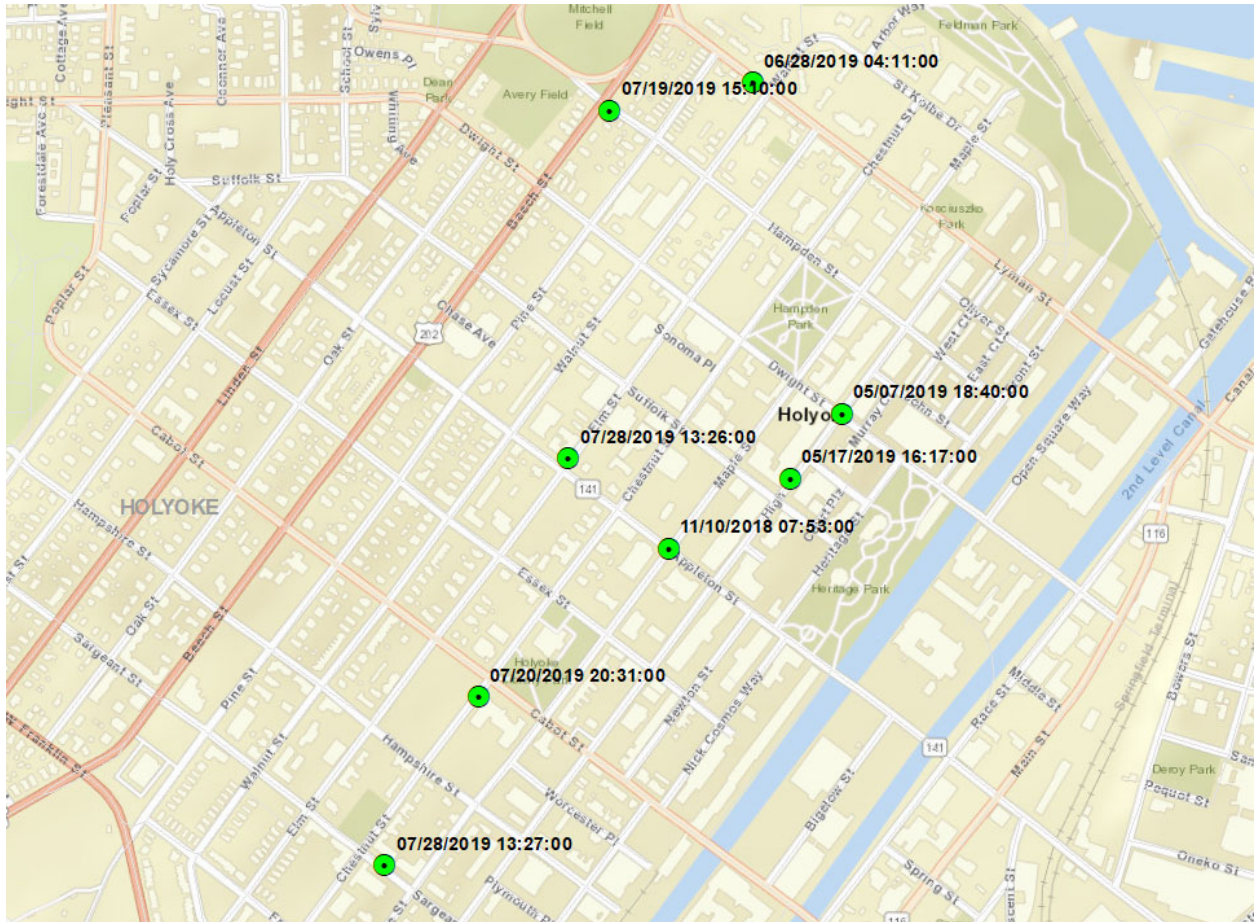


Figure 11: A pattern of thefts from persons in downtown Holyoke between May and July of 2019.

Shoplifting

Big increases at Target, Macy's Victoria's Secret, and JC Penny at the Holyoke Mall, plus Stop & Shop and CVS. Again, this might be a function of improved coding.

Thefts from buildings

There are no commonalities in the businesses affected by this increase, which started in April 2019, about the same time that the agency started improving its coding in other categories. A comparable drop in "all other" thefts suggests a shifting of categories rather than a real trend.

Fraud/con games

There are coding problems with this category. The agency reported single-digit totals in this IBR code (26A) until the end of 2018; then it reported 63 in the one year post-MGM. A review of the charges associated with the codes shows that they are almost all mis-coded credit card fraud (26B) or larceny by check (90A). There are a couple of repeat locations, including the Holyoke Mall and a local package store. It will take a bit longer to untangle the data to see if there are any real increasing trends in these categories.

Pornography

A dozen incidents in the post-MGM year have mostly occurred at local schools, with local teenagers listed as victims and suspects, suggesting that Holyoke's increase is part of a regional trend of sexting and passing around selfies of underaged subjects.

Weapon violations

The increase is made up of firearms offenses of all types; the charge of carrying ammunition without an FID card makes up about half of it. Another third consists of an increase in charges for carrying firearms without a license. Holyoke is some distance from MGM Springfield, and there is no spatial relation between the incidents and the casino. As statistics for this crime are heavily influenced by proactive police work and enforcement, the increase suggests a special operation or focus specific to Holyoke during this period, particularly in September of 2018.

Family offenses

Between February and 2015 and May 2019, the agency reported no crimes in this category, so the sudden increase seems to be a matter of improved coding rather than an actual increase.

Liquor laws

As with Chicopee, the increase seems to exclusively involve charges of open containers of alcohol in vehicles stopped during traffic enforcement.

Trespassing

A massive increase in this crime category began in March 2019, after several years of virtually no use of this code. All evidence points to under-reporting in previous years rather than an actual increase in the number of trespassing incidents. There is a high concentration at several apartment buildings on Elm Street and Essex Street.

Selected calls for service reported to Holyoke, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	99	-4	T	61–113	109	Expected
Disabled Vehicle	312	2	C	266–358	303	Expected
Disturbance	3550	-81	T	3069–3383	2991	Low
Domestic Dispute	400	-5	C	335–465	292	Low
General Service	1431	-13	C	1306–1556	1300	Low
Gunshots	129	-9	T	62–135	141	High
Hunting	1	0	C	0–2	0	Expected
Liquor	106	1	C	89–123	75	Low
Lost Property	99	-6	T	53–95	54	Expected
Medical	1738	104	T	1641–2666	1560	Low
Overdose	61	28	T	69–256	223	Expected
Psychological	168	67	T	171–704	576	Expected
Suspicious Activity	1303	-29	C	1102–1504	944	Low
Traffic Collision	2021	40	T	2034–2331	2103	Expected
Traffic Complaint	208	-13	T	113–244	161	Expected
Vagrancy	401	7	C	312–490	443	Expected

Gunshots

Gunshots reverted to totals seen earlier in the decade after extremely low years in 2017 and 2018. Incidents are heavily concentrated after dark, particularly in the early morning hours on weekends. Over 95% of incidents are east of Route 91, and over 70% are in downtown or South Holyoke. Fortunately, the increase in gunshot calls does not seem to correspond with an increase in people actually shot, as aggravated assault statistics show.

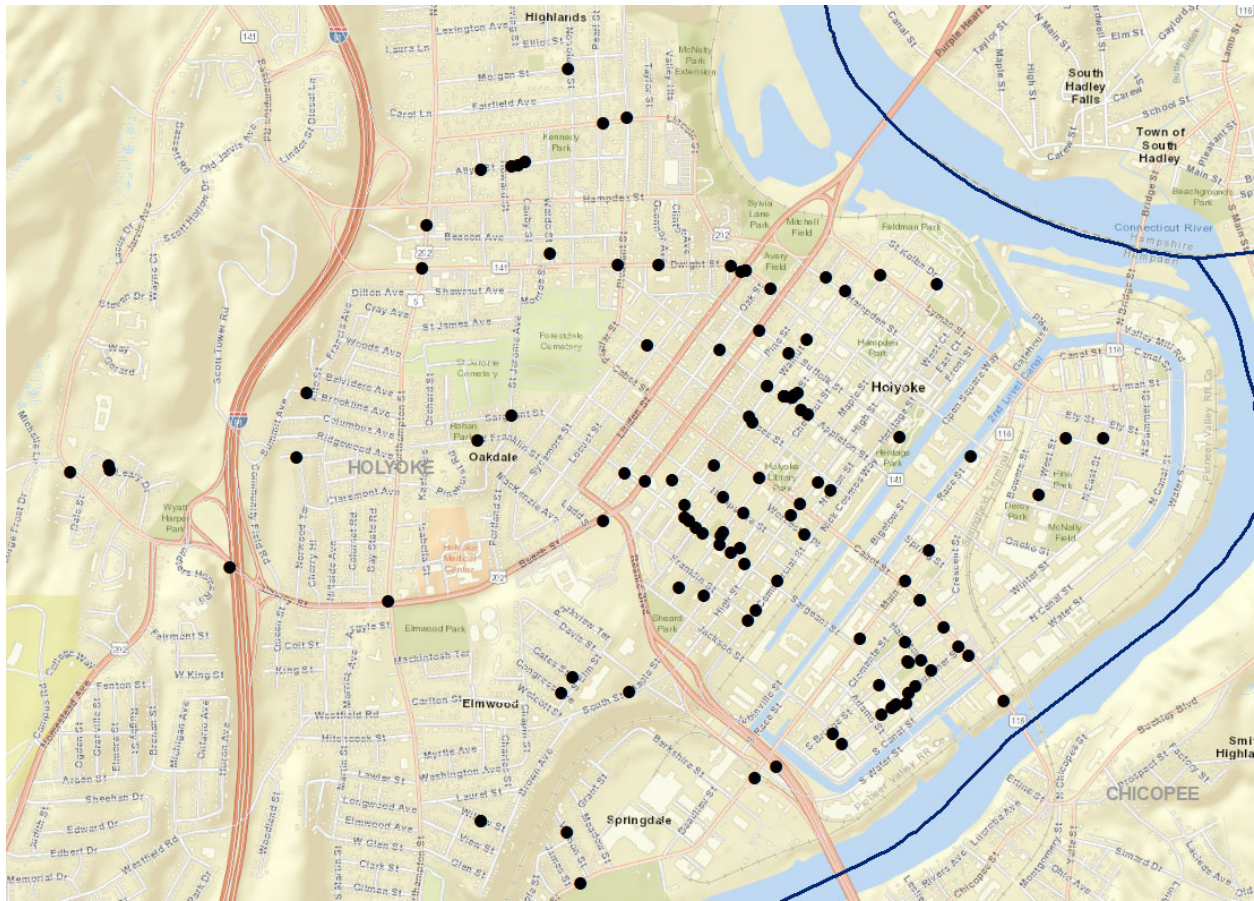


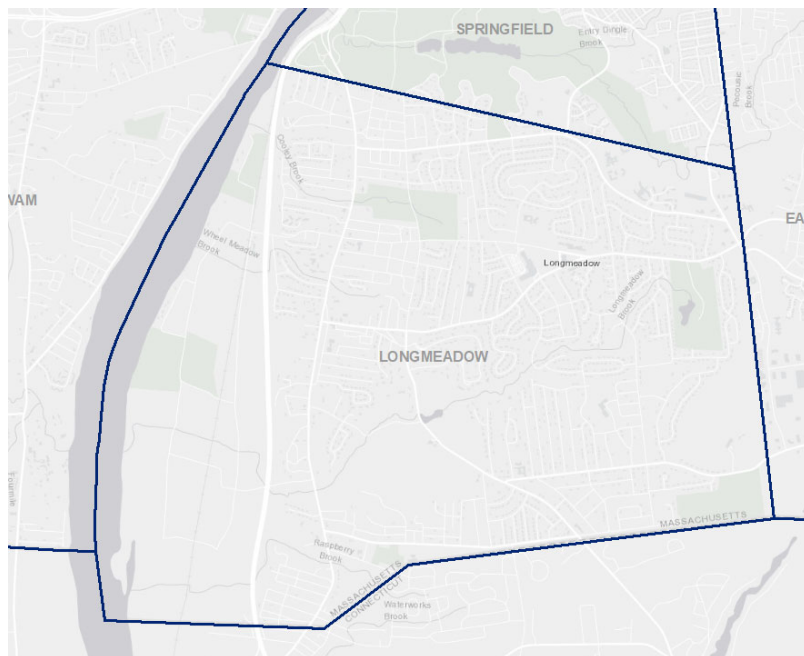
Figure 12: The gunshot area of concentration in Holyoke, September 2018 to August 2019.

Collisions reported to Holyoke, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	1112	32	T	1138–1344	1207	Expected
Parked vehicle	342	10	T	346–421	377	Expected
Pedestrian	34	1	C	23–45	27	Expected
Bicyclist	14	-1	T	8–16	8	Expected
Animal	7	1	T	5–11	3	Low
Fixed object	76	4	T	75–112	76	Expected
Curb/barrier	49	-2	C	39–59	62	High
Rollover/Jackknife	4	0	C	1–8	8	Expected
Other/Unknown	38	-1	C	24–52	36	Expected
Total	1676	46	T	1714–2008	1804	Expected

Only collisions against curbs and barriers were higher than their expected value for Holyoke. There were several days of inclement weather that had two or more such collisions, but otherwise no patterns can be seen in this increase.

One-year comparison: Longmeadow



Population (est. 2018): 15,848

Area: 9.7 square miles

Police officers: 27

City center distance from MGM:
3.67 miles

Longmeadow is physically close to Springfield and MGM, and the northern part of the town has often seen a spillover of crime from Springfield’s summer neighborhoods. In the year post-MGM, we saw a pattern of increased thefts from vehicles and residences within several northern Longmeadow neighborhoods, suppressed for a while by DDACTS deployments but returning in the summer of 2019. Traffic collisions had also been high in the last four months of 2018 but not in 2019, bringing the total just barely into the “expected” range. Traffic related complaints, on the other hand, remained high.

Crimes reported to Longmeadow, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	0	0	C	0-0	0	Expected
Sexual Assault	3	1	T	2-10	5	Expected
Kidnapping	0	0	C	0-1	0	Expected
Robbery	3	-1	T	0-3	0	Expected
Aggravated Assault	7	0	C	2-12	8	Expected
Simple Assault	15	-1	T	9-19	15	Expected
Threats	16	-2	T	8-19	17	Expected
Arson	0	0	T	0-1	0	Expected
Burglary	32	2	C	21-43	32	Expected
Theft from Persons	1	0	C	0-2	0	Expected
Purse-Snatching	1	0	C	0-2	0	Expected
Shoplifting	10	0	C	6-14	8	Expected
Theft from Building	36	2	C	21-51	23	Expected
Theft from Machine	0	0	C	0-0	0	Expected
Theft from Vehicle	35	-2	C	27-42	43	High

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft of MV Parts	0	0	C	0-1	1	Expected
Other Theft	58	-4	T	31-67	51	Expected
Auto Theft	6	1	C	2-11	12	High
Forgery	6	-1	T	3-6	3	Expected
Fraud/Con Games	26	1	C	16-36	26	Expected
Credit Card Fraud	7	0	C	3-11	2	Low
Identity Theft	25	1	C	17-33	31	Expected
Employee Theft	1	0	C	0-2	0	Expected
Extortion	0	0	C	0-0	1	Expected
Stolen Property	5	0	C	3-7	2	Low
Vandalism	58	-5	T	34-63	33	Low
Drugs	7	0	C	5-9	4	Low
Statutory Rape	2	0	T	1-4	1	Expected
Pornography	1	0	C	0-2	1	Expected
Prostitution	0	0	C	0-0	0	Expected
Weapons	2	0	C	0-4	2	Expected
Bad Checks	3	-1	T	0-4	0	Expected
Disorderly	3	0	C	0-6	1	Expected
Drunk Driving	21	-1	C	11-32	17	Expected
Drunkenness	2	-1	T	0-3	2	Expected
Family Offenses	0	0	T	0-1	0	Expected
Liquor Laws	11	-2	T	2-12	3	Expected
Trespassing	4	0	C	2-6	4	Expected
Violent Total	44	-3	T	24-50	45	Expected
Property Total	307	-6	C	273-341	267	Low
Total	406	6	C	383-429	347	Low

Thefts from vehicles

Longmeadow shared a pattern of thefts from vehicles at nighttime in residential driveways with East Longmeadow and Springfield. The crime was high for the last few months of 2018, nearly disappeared for a while in the first few months of 2019, and then came roaring back for the May–August period of 2019. The pattern involves wallets, purses, and other items of small value taken from unlocked cars while the residents are sleeping. Ludlow seems to have identified more suspects in the cases than the other two agencies, including the arrest of a 32-year-old man from Worcester and the identification of a 26-year-old man from Florida as a possible suspect.

Auto theft

Longmeadow's auto theft increase does not seem to be related to the residential theft-from-vehicle pattern on the north end of town. The incidents are scattered more liberally throughout town and mostly at commercial locations. It would be useful to check recovery locations and conditions for the spate of incidents in fall 2018 and summer 2019.

Selected calls for service reported to Longmeadow, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Disabled Vehicle	0	0	C	0–1	0	Expected
Disturbance	117	-6	T	72–118	93	Expected
Domestic Dispute	120	-5	C	94–146	105	Expected
General Service	67	1	C	55–79	52	Low
Medical	877	13	T	836–1023	874	Expected
Suspicious Activity	1040	27	T	998–1299	1207	Expected
Traffic Collision	530	-12	C	473–587	407	Low
Traffic Complaint	382	-6	C	350–414	408	Expected

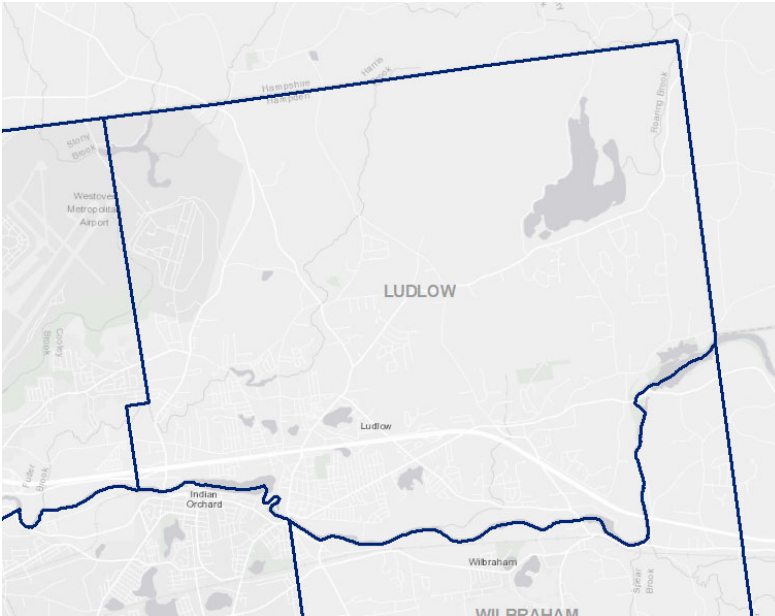
Longmeadow’s traffic complaints had been running higher-than average during the eight months post-MGM, but they dipped just into “expected” territory for the last four months of the one-year period. All other categories were expected or low.

Collisions reported to Longmeadow, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	243	-6	T	186–256	247	Expected
Parked vehicle	71	-2	T	54–73	85	High
Pedestrian	3	0	C	1–5	4	Expected
Bicyclist	4	0	C	2–6	1	Low
Animal	16	1	C	8–25	22	Expected
Fixed object	26	1	C	23–29	30	High
Curb/barrier	9	0	C	6–12	14	High
Rollover/Jackknife	0	0	T	0–0	1	High
Other/Unknown	8	0	C	6–10	10	Expected
Total	380	-6	C	350–410	414	High

Longmeadow had a modest increase in crashes involving vehicles in traffic and parked vehicles. The brunt of the increase is concentrated in the northeast corner of the city, at the intersections of Dwight Road, Converse Street, and Williams Street. Although this area could logically be connected with more local traffic going to MGM, a lack of similar increases at other locations along the same routes puts the ultimate conclusion in doubt.

One-year comparison: Ludlow



Population (est. 2018): 21,529

Area: 28.2 square miles

Police officers: 40

City center distance from MGM:
9.55 miles

A largely residential community, Ludlow showed no increases in crime along the travel routes to MGM that we hypothesized might see greater activity. Nor did it see any changes in traffic collisions. It did, however, see a near-immediate increase in domestic violence (simple assaults) and domestic disputes, a trend that also affected several other communities in this study. It is too soon to say whether this trend is related to MGM Springfield: answering that question will have to involve a more thorough analysis of the full reports.

Crimes reported to Ludlow, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	0	0	T	0–3	0	Expected
Sexual Assault	6	0	C	2–10	4	Expected
Kidnapping	1	0	C	0–2	2	Expected
Robbery	7	-2	T	2–8	3	Expected
Aggravated Assault	27	5	T	33–53	47	Expected
Simple Assault	65	4	C	41–89	111	High
Threats	40	0	C	30–50	39	Expected
Arson	1	0	C	0–2	1	Expected
Burglary	72	-7	T	40–73	42	Expected
Theft from Persons	1	0	C	0–2	2	Expected
Purse-Snatching	2	0	C	0–4	0	Expected
Shoplifting	27	3	C	13–44	30	Expected
Theft from Building	48	-5	T	25–58	16	Low
Theft from Machine	0	0	C	0–0	0	Expected
Theft from Vehicle	39	-2	C	19–59	32	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft of MV Parts	0	0	T	0-3	2	Expected
Other Theft	132	-12	T	70-111	99	Expected
Auto Theft	19	2	T	18-36	14	Low
Forgery	16	1	T	17-25	13	Low
Fraud/Con Games	31	5	T	39-58	32	Low
Credit Card Fraud	12	1	C	4-20	2	Low
Identity Theft	28	3	T	29-46	22	Low
Employee Theft	3	0	C	1-5	0	Low
Extortion	0	0	C	0-1	0	Expected
Stolen Property	8	-1	C	4-12	5	Expected
Vandalism	125	-5	T	79-136	114	Expected
Drugs	38	3	T	31-66	32	Expected
Statutory Rape	3	1	C	1-6	0	Low
Pornography	2	0	C	0-5	2	Expected
Prostitution	0	0	C	0-0	0	Expected
Weapons	7	1	T	5-14	9	Expected
Bad Checks	7	-1	T	2-8	0	Low
Disorderly	21	1	C	15-27	11	Low
Drunk Driving	44	3	T	45-67	57	Expected
Drunkenness	11	-1	T	5-11	6	Expected
Family Offenses	0	0	C	0-1	0	Expected
Liquor Laws	15	0	C	11-19	14	Expected
Trespassing	10	-1	C	5-16	10	Expected
Violent Total	146	7	C	111-181	206	High
Property Total	563	-17	T	400-588	426	Expected
Total	866	10	C	787-945	773	Low

Simple assault

Ludlow saw a spike in domestic simple assaults (assaults without dangerous weapons and without serious injury) in the final four months of 2018 and then again from May to August of 2019. The events are spread out over the town and show no particular geographic or temporal concentrations, but the charge language suggests that most of the increase is among domestic assaults.

Selected calls for service reported to Ludlow, 1 September-31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	6	0	C	3-9	18	High
Disabled Vehicle	161	5	C	137-185	175	Expected
Disturbance	956	-83	T	556-810	747	Expected
Domestic Dispute	156	-3	C	135-177	199	High
General Service	867	44	T	963-1123	1047	Expected
Lost Property	4	1	T	3-8	5	Expected
Medical	1684	63	T	1842-2028	2033	High

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Psychological	7	0	C	3-11	3	Expected
Suspicious Activity	618	40	T	630-931	617	Low
Traffic Collision	553	17	T	530-709	586	Expected
Traffic Complaint	31	17	T	54-125	176	High
Vagrancy	2	0	C	0-4	0	Expected

Abandoned vehicles

The total isn't particularly high compared to other communities, but the 18 "abandoned vehicle" incidents reported by Ludlow in the twelve months post-MGM are high for the community. Most incidents occurred between November and December, but other than a pair of them at 12 Center Street 12 days apart in December, there's no geographic concentration. Nothing else can be determined from available data. A lack of similar incidents in other communities makes an MGM connection unlikely, particularly where the increase did not continue into 2019.

Domestic disputes

Ludlow's increase in domestic dispute calls for service during this period mirrors its increase in domestic-related simple assaults. As with the assaults, this is a trend that did not begin until after September, although it's hard to see why such an immediate increase would be tied to the casino.

Medical aids

A senior housing location called Keystone Commons contributed nearly 100 more medical aid calls in 2019 than the location's average. An apartment on State Street and the Ludlow Police Department itself were both well above average.

Traffic complaints

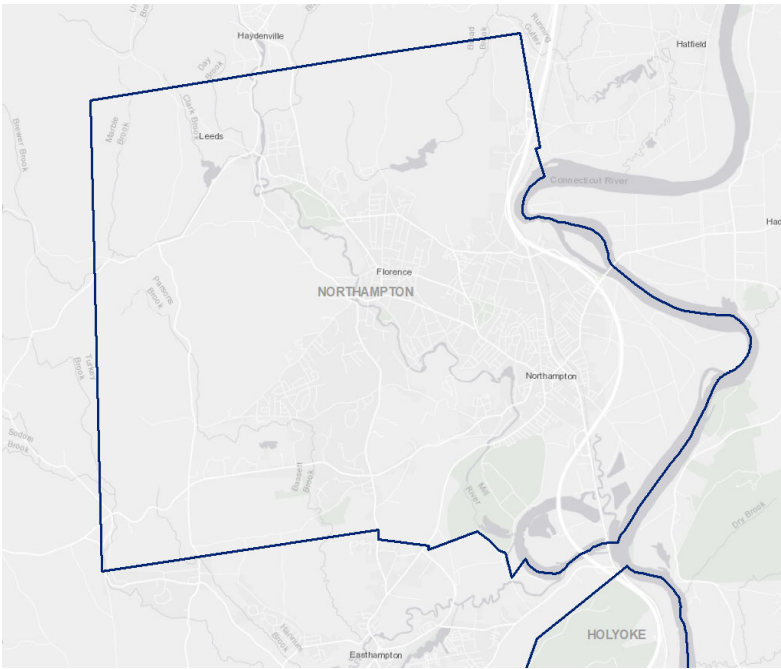
Complaints of "erratic operation" increased in Ludlow during this period, primarily on Center Street, East Street, Miller Street, and West Street on weekday evenings. However, the agency did not start using this code until 2016, making average and predictive volumes difficult to calculate.

Collisions reported to Ludlow, 1 September-31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	334	24	T	355-503	363	Expected
Parked vehicle	84	4	T	82-117	97	Expected
Pedestrian	7	0	C	4-10	5	Expected
Bicyclist	4	0	C	2-6	7	High
Animal	8	1	T	6-18	13	Expected
Fixed object	63	5	T	71-93	69	Low
Curb/barrier	28	1	C	21-35	31	Expected
Rollover/Jackknife	5	1	T	5-8	9	High
Other/Unknown	27	-1	C	24-30	33	High
Total	559	35	T	603-793	627	Expected

Ludlow's traffic collisions increased steadily from 2010 to 2018, so it was nice to see that 2019 reversed rather than continue the trend. Although a few categories were higher than normal, no patterns could be seen within them. Overall, the city enjoyed a low-normal number of crashes this period.

One-year comparison: Northampton



Population (est. 2018): 28,458

Area: 35.8 square miles

Police officers: 63

City center distance from MGM:
16.70 miles

As the farthest community from MGM in this study, if Northampton was likely to have an increase in crimes or calls because of MGM, it would most likely be reflected in its few hotels, services near its highway exits, and perhaps a general increase in the population visiting its arts community. So far, it does not appear that these trends have occurred. Total crime was low for the agency this period, though there were increases in, auto theft, fraud, family offenses, and trespassing. A pattern of bad checks and forged checks seen in the final months of 2018 did not continue into 2019.

Crimes reported to Northampton, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	0	0	C	0–1	1	Expected
Sexual Assault	37	0	C	28–46	36	Expected
Kidnapping	4	0	C	1–8	7	Expected
Robbery	17	0	C	6–28	7	Expected
Aggravated Assault	93	4	T	89–127	88	Low
Simple Assault	296	-15	T	207–274	233	Expected
Threats	74	-7	T	40–71	51	Expected
Arson	5	0	C	1–9	7	Expected
Burglary	120	-13	T	64–110	72	Expected
Theft from Persons	4	0	T	2–4	1	Low
Purse-Snatching	2	0	C	0–4	2	Expected
Shoplifting	150	5	C	109–191	141	Expected
Theft from Building	232	-30	T	130–162	120	Low

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft from Machine	1	0	C	0-2	2	Expected
Theft from Vehicle	73	-6	C	45-101	41	Low
Theft of MV Parts	22	-5	T	8-20	16	Expected
Other Theft	139	-12	T	79-124	83	Expected
Auto Theft	21	-2	T	10-22	24	High
Forgery	29	-2	T	19-32	25	Expected
Fraud/Con Games	53	1	C	43-63	68	High
Credit Card Fraud	16	0	C	9-23	9	Expected
Identity Theft	49	-7	T	25-36	19	Low
Employee Theft	4	0	C	1-9	0	Low
Extortion	0	0	T	0-1	1	Expected
Stolen Property	16	-1	C	10-22	10	Expected
Vandalism	228	-23	T	138-196	130	Low
Drugs	100	-9	T	54-111	55	Expected
Statutory Rape	4	1	T	5-9	7	Expected
Pornography	6	1	C	2-10	8	Expected
Prostitution	0	0	C	0-1	0	Expected
Weapons	12	0	C	6-18	7	Expected
Bad Checks	7	0	C	4-10	7	Expected
Disorderly	69	-5	T	42-76	45	Expected
Drunk Driving	128	2	C	87-169	85	Low
Drunkenness	156	-20	T	71-146	91	Expected
Family Offenses	1	0	C	0-2	7	High
Liquor Laws	41	-5	T	23-40	25	Expected
Trespassing	46	-4	T	24-55	59	High
Violent Total	522	-18	T	397-503	423	Expected
Property Total	1164	-96	T	762-931	771	Expected
Total	2258	-109	T	1584-1927	1590	Expected

Auto theft

Northampton was hit with a modest increase in auto theft during this period, centered east of downtown along Route 5. A lack of corroborative increases in other communities (the crime was significantly low for the region) suggests that the trend is unrelated to MGM, but the agency seems to have a pattern with some causal factor between January and April of 2019.

Fraud/Con Games

A fairly significant increase in fraud incidents from March to August seem to be mostly mis-coded credit card frauds, but that simply shifts the increase to a different category. The Wal-Mart on North King Street reported 10 incidents (up from a usual 4-5 per year), and there was another concentration along Main Street businesses. A detailed review of narratives will be necessary to identify any specific patterns within this increase.

Family offenses

As with Holyoke, the increase here seems to be one of improved coding rather than an actual change. All of the "2019" incidents occurred after March, and there were a couple of repeat residences.

Trespassing

A high number in a somewhat erratic category, Northampton's trespassing increase in the last 12 months is localized in the downtown area, primarily on Main Street. It would have no connection to MGM unless it can be shown that MGM has caused a general increase in visitors to the town.

Selected calls for service reported to Northampton, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	21	-2	T	12–24	5	Low
Disabled Vehicle	302	-5	C	262–342	303	Expected
Disturbance	1748	-34	T	1421–1805	1483	Expected
General Service	864	18	T	832–1036	913	Expected
Liquor	332	-11	C	278–386	253	Low
Lost Property	463	8	C	422–504	400	Low
Medical	1648	99	T	1781–2309	1809	Expected
Overdose	23	10	T	52–68	46	Low
Psychological	167	-79	T	0–126	11	Expected
Suspicious Activity	2067	-174	T	1195–2180	1425	Expected
Traffic Collision	1294	19	T	1264–1477	1347	Expected
Traffic Complaint	923	-7	T	846–942	865	Expected
Vagrancy	24	7	T	29–56	20	Low

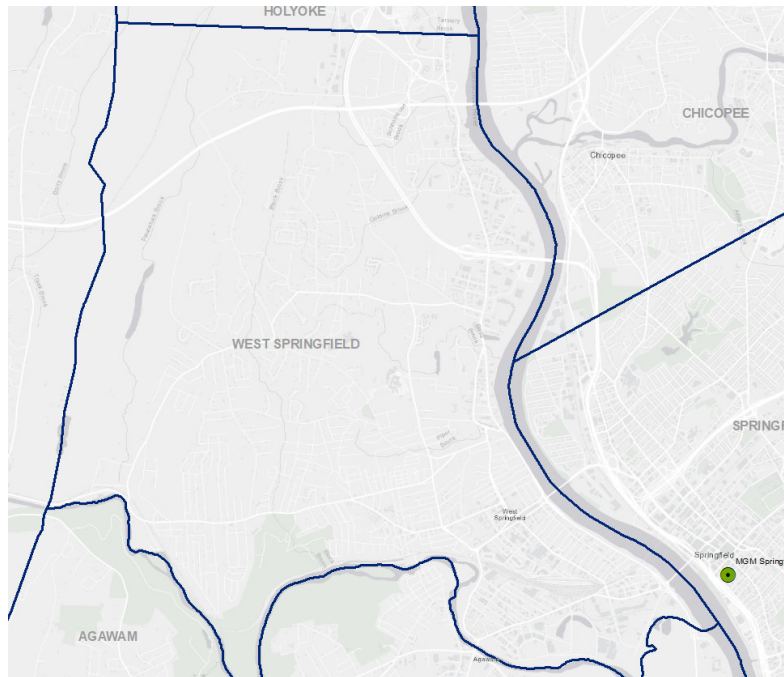
Increases in disabled vehicles and general service calls seen in late 2018 did not continue into 2019, resulting in no unusually "high" incident types for the overall one-year period.

Collisions reported to Northampton, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	394	-2	C	369–419	371	Expected
Parked vehicle	54	-3	C	37–71	47	Expected
Pedestrian	15	-1	C	9–21	11	Expected
Bicyclist	14	-1	T	7–16	6	Low
Animal	13	1	C	7–19	30	High
Fixed object	48	2	C	33–63	31	Low
Curb/barrier	26	0	C	15–37	16	Expected
Rollover/Jackknife	4	-1	T	0–4	3	Expected
Other/Unknown	14	1	T	12–20	11	Low
Total	580	-6	C	540–620	526	Low

The only cogent category to see an increase in traffic collisions in Northampton was animal-related crashes, which showed no spatial or temporal concentration. Overall crashes were low in the city for the time period.

One-year comparison: West Springfield



Population (est. 2018): 28,747

Area: 17.5 square miles

Police officers: 89

City center distance from MGM:
3.83 miles

With a large hotel cluster directly across the river from MGM Springfield, it seemed inevitable that West Springfield would see an increase in activity at hotels specifically. Twelve months later, the hotels may have more patrons, but their presence isn't being reflected in any additional crime. Hotel crime in the city is down from the average.

In general, crime is expected or low in the city. A pattern of purse snatchings identified in the first four-month report did not continue, and many other crimes that seemed to have increased initially regressed to the mean over time. The only persistent increase so far have been in traffic collisions and "suspicious activity" calls, both of which could be plausibly related to extra traffic through the community.

Crimes reported to West Springfield, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	1	0	C	0–3	0	Expected
Sexual Assault	28	2	T	22–49	32	Expected
Kidnapping	5	1	C	1–9	6	Expected
Robbery	34	-1	C	26–42	14	Low
Aggravated Assault	119	5	C	94–144	108	Expected
Simple Assault	218	-20	T	124–206	178	Expected
Threats	67	-2	C	50–84	69	Expected
Arson	4	0	C	2–6	4	Expected
Burglary	201	-30	T	95–125	120	Expected
Theft from Persons	7	0	C	3–11	10	Expected
Purse-Snatching	8	-1	C	3–13	8	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Shoplifting	318	10	C	256–380	354	Expected
Theft from Building	145	-6	C	107–183	86	Low
Theft from Machine	0	0	C	0–0	0	Expected
Theft from Vehicle	126	-14	T	72–142	105	Expected
Theft of MV Parts	2	-1	T	0–2	2	Expected
Other Theft	514	-35	T	330–449	358	Expected
Auto Theft	92	-8	T	49–91	52	Expected
Forgery	34	0	C	31–37	32	Expected
Fraud/Con Games	74	2	C	64–84	113	High
Credit Card Fraud	16	0	C	11–21	12	Expected
Identity Theft	48	2	C	37–59	57	Expected
Employee Theft	9	1	T	8–16	3	Low
Extortion	1	0	T	0–2	0	Expected
Stolen Property	33	-2	T	19–36	26	Expected
Vandalism	330	-19	T	224–307	231	Expected
Drugs	99	-7	C	63–135	121	Expected
Statutory Rape	7	0	C	4–10	5	Expected
Pornography	5	0	C	2–8	7	Expected
Prostitution	3	0	C	0–6	0	Expected
Weapons	10	1	C	3–17	14	Expected
Bad Checks	12	-2	T	3–10	1	Low
Disorderly	33	0	C	24–42	30	Expected
Drunk Driving	26	-1	C	19–33	30	Expected
Drunkenness	1	0	C	0–3	1	Expected
Family Offenses	4	0	C	2–6	5	Expected
Liquor Laws	9	-1	C	4–14	7	Expected
Trespassing	25	1	C	17–33	33	Expected
Violent Total	471	-15	T	316–508	407	Expected
Property Total	1962	-101	T	1395–1719	1573	Expected
Total	2667	-91	T	1925–2581	2234	Expected

Fraud/con games

Very high totals for this category in West Springfield were subjected to a more thorough review of individual cases with the West Springfield Police at the end of the year. The analysis showed that about one-third of the cases were mis-coded credit card frauds and the rest were an odd miscellany of swindles that showed no particular patterns. The analysis should be repeated, however, with incidents reported since the beginning of 2019, as the number has intensified. The Riverdale Shops seem particularly susceptible to such incidents, and we might be seeing a (miscoded) extension of the forgery incidents around Metro Center Springfield.

Selected calls for service reported to West Springfield, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Disturbance	1954	-51	T	1518–1978	1863	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Domestic Dispute	366	39	T	379-667	584	Expected
General Service	729	-45	T	444-685	667	Expected
Suspicious Activity	1204	1	C	1115-1293	1433	High
Traffic Collision	1602	11	C	1504-1700	1744	High
Traffic Complaint	828	43	T	787-1194	1017	Expected

Suspicious Activity

At the end of the four-month report, both disturbances and suspicious activity had increased particularly at businesses and streets just over the two bridges from Springfield, particularly late at night, which might have been evidence of spillover from MGM. In the subsequent eight months, disturbance calls decreased but suspicious activity remained high at businesses on Memorial Avenue, Park Street, and Riverdale Street (see Figure 12). In addition to this spatial relation, calls have increased generally at gas stations throughout the town. Anecdotal evidence suggests that many of these calls are related to panhandlers in the area.

**Suspicious Activity Calls in West Springfield
September 2018 to August 2019**

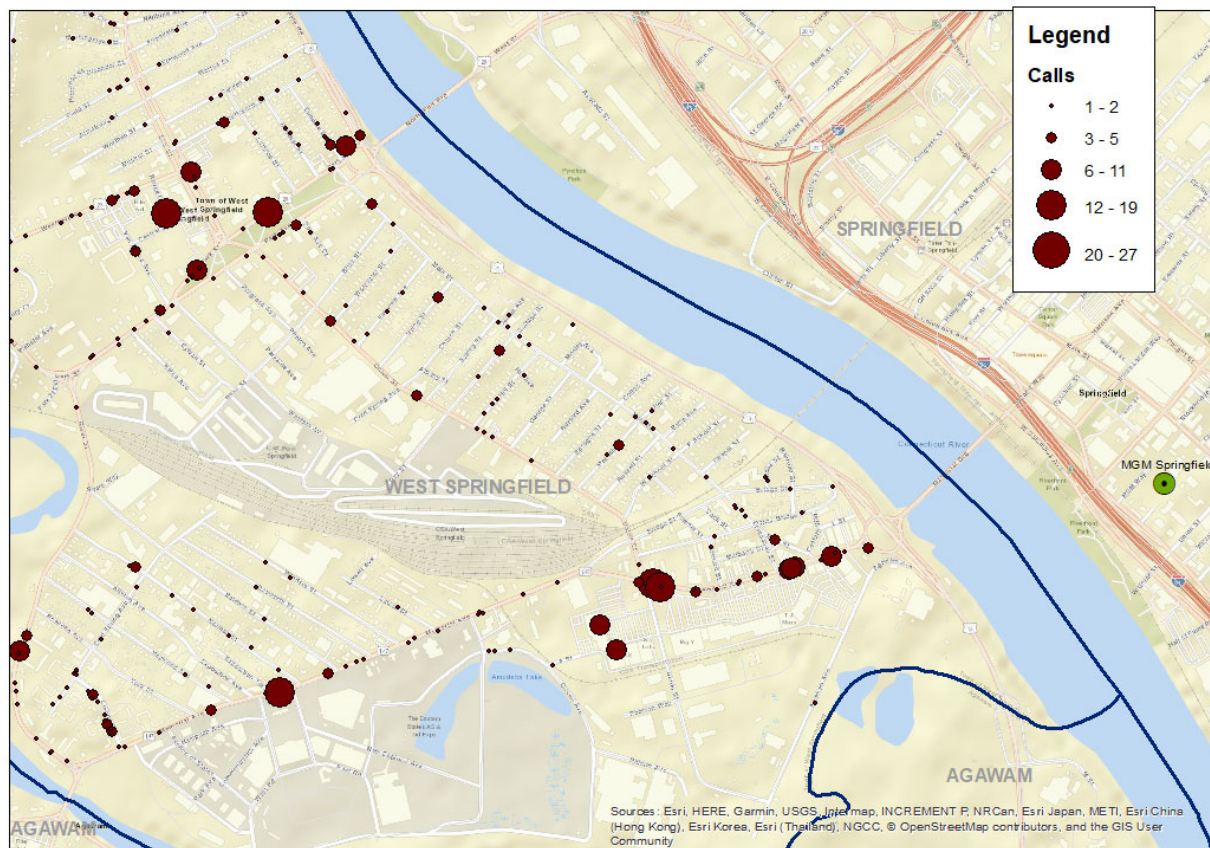


Figure 13: "Suspicious Activity" calls for 2018-2019 show an increase at locations just over the bridges from MGM Springfield.

Traffic Collisions

The increase in collisions reported to CAD mirrors the increase in reported collisions discussed below.

Collisions reported to West Springfield, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	488	8	C	446–530	643	High
Parked vehicle	54	2	C	43–65	100	High
Pedestrian	19	0	C	13–25	26	High
Bicyclist	7	0	C	2–12	4	Expected
Animal	2	0	C	2–3	10	High
Fixed object	54	0	C	50–58	68	High
Curb/barrier	46	-1	C	38–54	52	Expected
Rollover/Jackknife	2	0	C	1–4	3	Expected
Other/Unknown	22	-2	T	11–23	25	High
Total	696	7	C	650–742	931	High

West Springfield showed the sharpest increase in traffic collisions of the participating agencies, with higher-than-expected totals in nearly all categories. The increase began immediately after the opening of MGM and continued throughout the entire year (although was lowest in January and February). The increase is spread uniformly across the days of the week from 08:00 to 20:00. Geographically, as seen in Figure 6, the increase is highest on street segments approaching West Springfield's two bridges to Springfield, particularly on Memorial Avenue, Riverdale Road, and Westfield Street. The increase in crashes makes geographic, temporal, and logical sense as having been caused by extra vehicle traffic heading to MGM.

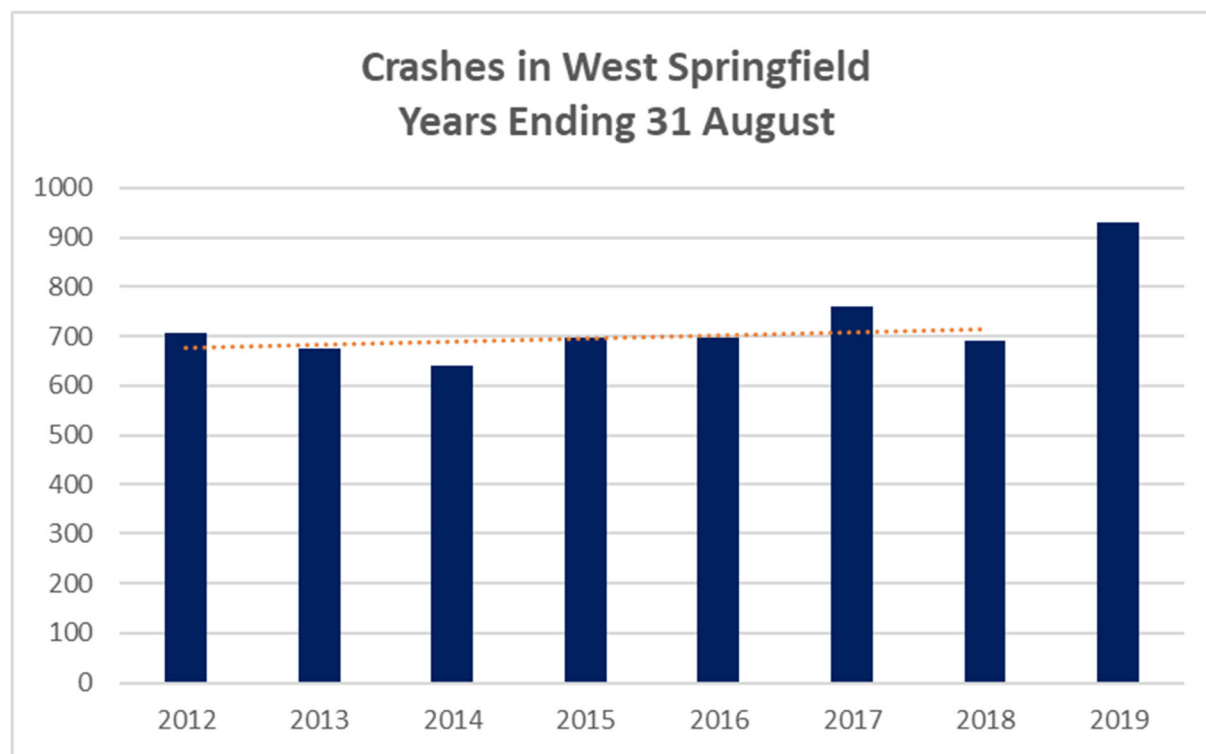


Figure 14: A yearly view of crashes shows a significant increase in the year ending 31 August 2019.

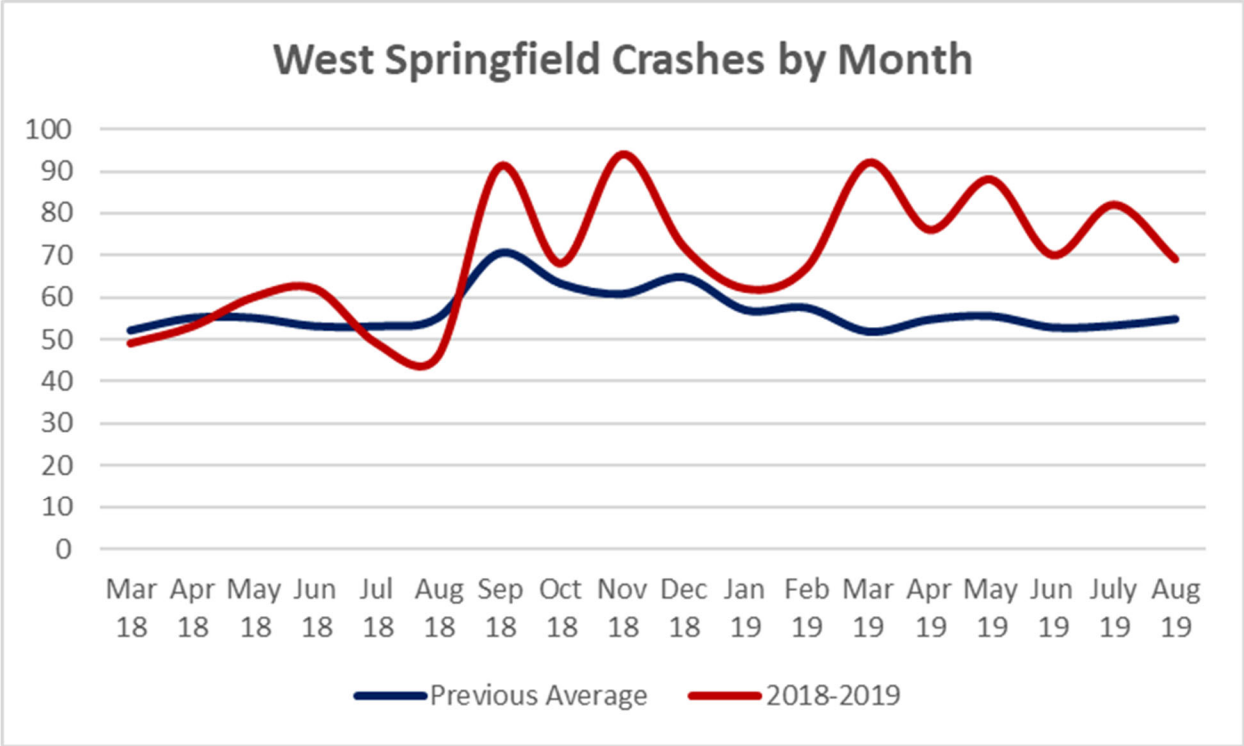


Figure 15: A month-by-month view shows that the increase started immediately after MGM Springfield opened.

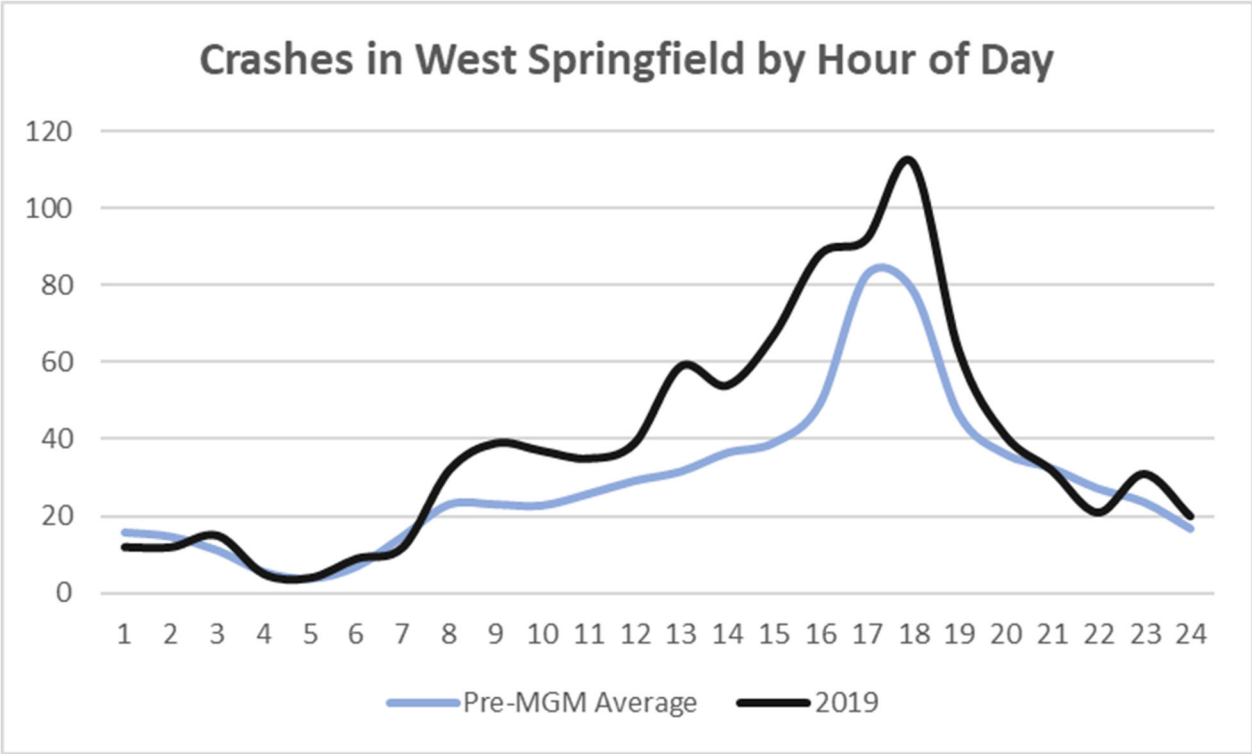
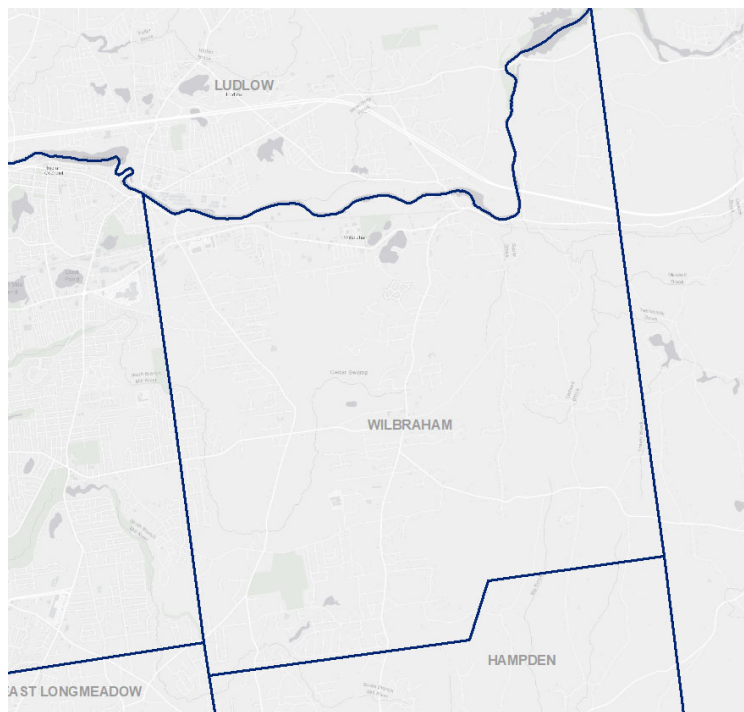


Figure 16: The increase in West Springfield crashes is heaviest from 08:00 to 20:00.

One-year comparison: Wilbraham



Population (est. 2018): 14,749

Area: 22.4 square miles

Police officers: 27

City center distance from MGM:
8.36 miles

Wilbraham is physically close to Springfield but lacks significant travel routes to and from MGM Springfield. A concern going into this study was increased retail crimes along Route 20. There were increased shopliftings at Home Depot and CVS, but these could easily involve changes to store policy rather than actual trends. Overall, the agency experienced total crime and property crime within expected parameters, with a few notable increases discussed below. For calls for service, only hunting-related calls and general service calls increased, neither with a logical casino nexus. Crashes were close to average volumes.

Crimes reported to Wilbraham, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	0	0	C	0–0	0	Expected
Sexual Assault	6	0	C	3–9	11	High
Kidnapping	1	0	C	0–2	0	Expected
Robbery	2	0	C	0–4	1	Expected
Aggravated Assault	12	-1	C	7–17	17	Expected
Simple Assault	48	1	C	36–60	58	Expected
Threats	38	-3	T	18–44	35	Expected
Arson	1	0	C	0–2	0	Expected
Burglary	47	-7	T	16–49	22	Expected
Theft from Persons	1	0	C	0–2	0	Expected
Purse-Snatching	0	0	C	0–1	0	Expected
Shoplifting	31	3	T	26–61	68	High
Theft from Building	22	-3	C	9–36	5	Low

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Theft from Machine	0	0	C	0-0	0	Expected
Theft from Vehicle	24	-3	T	13-32	14	Expected
Theft of MV Parts	1	0	T	1-4	0	Low
Other Theft	81	-8	T	41-74	51	Expected
Auto Theft	14	-1	C	6-23	6	Expected
Forgery	8	0	C	6-10	7	Expected
Fraud/Con Games	16	1	C	9-23	17	Expected
Credit Card Fraud	5	0	C	2-8	8	Expected
Identity Theft	13	1	C	7-19	20	High
Employee Theft	3	-1	T	1-2	0	Low
Extortion	0	0	C	0-0	2	Expected
Stolen Property	8	1	C	5-11	8	Expected
Vandalism	67	-8	T	30-67	51	Expected
Drugs	51	-5	C	19-83	14	Low
Statutory Rape	4	0	C	1-7	4	Expected
Pornography	2	0	C	1-3	3	Expected
Prostitution	0	0	C	0-0	0	Expected
Weapons	4	0	C	1-8	2	Expected
Bad Checks	3	0	C	0-6	1	Expected
Disorderly	12	1	C	7-17	7	Expected
Drunk Driving	56	0	C	25-87	39	Expected
Drunkenness	9	0	C	3-15	10	Expected
Family Offenses	0	0	C	0-1	0	Expected
Liquor Laws	19	0	C	8-31	10	Expected
Trespassing	8	1	C	4-12	7	Expected
Violent Total	107	-3	C	86-128	122	Expected
Property Total	344	-24	T	213-366	279	Expected
Total	619	-47	T	279-627	498	Expected

Sexual assault

Wilbraham recorded 11 sexual assaults during this period, 6 of them during the first four months of 2019, all of them in the “indecent assault/fondling” category. The charges indicate that all but one involved an adult victim. No commonalities in location or location type can be seen among the incidents, and the limited information supplied with such sensitive crimes means that we have to send it back to the agency to comment further.

Shoplifting

The shoplifting increase is localized at two locations: a CVS and a Home Depot. The increases could reflect actual increases in shoplifting at the stores, but its suddenness—and a lack of complementary increases in other stores in the region—suggest that changes in security policy or practice are more likely to credit.

Identity theft

The agency saw a big jump in identify fraud during the last four months of the period (May–August). About half the incidents were reported at the police department.

Selected calls for service reported to Wilbraham, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	10	0	C	6–14	7	Expected
Disabled Vehicle	185	8	C	146–224	196	Expected
Disturbance	145	-3	C	123–167	130	Expected
Domestic Dispute	146	11	T	140–233	159	Expected
General Service	613	4	C	577–649	684	High
Gunshots	25	0	C	19–31	20	Expected
Hunting	3	1	C	0–6	8	High
Lost Property	46	0	C	41–51	43	Expected
Medical	874	53	T	824–1311	1027	Expected
Psychological	35	5	T	47–65	51	Expected
Suspicious Activity	921	-10	C	726–1116	730	Expected
Traffic Collision	391	3	C	369–413	397	Expected
Traffic Complaint	224	12	T	241–304	305	High

General service

An increase in calls for general police services—escorts, lockouts, information and directions, and so forth—might accompany an increase in visitors to the area, but in Wilbraham’s case the higher statistics seem to be related to a bump in car seat inspections, which would focus primarily on residents and thus not have a casino nexus.

Hunting

Wilbraham, Agawam, and Hampden are the only three agencies to track hunting complaints. Both Wilbraham and Hampden showed an increase in calls, but not in any way that shares their geography. Incidents in both agencies were heavily concentrated in the 30 November–29 December period, and Wilbraham had three on Saturday, 15 December. The CAD data offers no additional information on the events, which did not continue into 2019.

Traffic complaints

Wilbraham showed a heavy increase in “erratic operator” calls, particular on Boston Road (Route 20) in the summer months of 2019.

Collisions reported to Wilbraham, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Vehicle in traffic	195	-1	C	176–214	185	Expected
Parked vehicle	30	0	C	20–40	31	Expected
Pedestrian	2	0	C	0–5	2	Expected
Bicyclist	2	0	C	0–4	2	Expected
Animal	21	3	T	17–50	37	Expected
Fixed object	48	1	C	39–57	48	Expected
Curb/barrier	21	0	C	13–29	18	Expected
Rollover/Jackknife	2	0	C	0–4	2	Expected
Other/Unknown	14	-1	T	8–14	15	High
Total	335	2	C	320–350	340	Expected

Total collisions were in the normal range in Wilbraham, as were all the individual categories.

One-year comparison: State Police



Figure 17: A network of State Police-patrolled highways and routes feeds the MGM Springfield area.

State Police patrol state highways (principally I-90, I-91, I-291, and I-391) in the Springfield area, plus state properties and parks. They assist local police in response to some crime issues, and in particular have a longstanding partnership with the Springfield Police to patrol hot spots and reduce street violence and gang activity. In 2018, The State Police Gaming Enforcement Unit took over primary enforcement responsibilities at MGM Springfield.

The Massachusetts State Police operates a records system with different conventions and reporting rules than the local agencies, so the categories and totals are not directly compatible. In some cases, where both agencies responded to an incident, the two systems may duplicate each other. The data below comes from a combination of multiple State Police stations, including B-3 (Springfield), B-6 (Northampton), several sections of Troop E eliminated in 2018, and various mobile statewide units such as headquarters units, canine units, and investigators. As with the local agencies, it excludes at MGM specifically, as those were covered in a previous section of the report.

Incidents reported to the State Police in the MGM area, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Abandoned Vehicle	18	5	T	22–54	59	High
Assault	15	0	C	12–18	14	Expected
Building Check	3911	348	T	3347–6501	3918	Expected
Disabled Vehicle	2644	-69	C	2248–3040	2904	Expected
Disturbances	43	1	C	26–60	61	High
Domestic Dispute	19	1	C	13–25	19	Expected
Drugs	53	-9	T	16–68	73	High
General Service	146	-29	T	52–90	148	High
Gunshots	48	11	T	32–152	126	Expected
Lost Property	26	-2	C	16–36	38	High
Medical	111	2	C	77–145	132	Expected
Psychological	10	-1	T	6–12	15	High
Robbery	12	-1	C	6–18	5	Low
Suspicious Activity	49	0	C	29–69	43	Expected
Traffic Collision	1983	57	T	2005–2415	2144	Expected
Traffic Complaint	680	-23	T	431–748	815	High
Trespassing	21	0	C	5–39	12	Expected

As with many of the reporting communities, we see increases in primarily traffic-related incidents, including disabled and abandoned vehicles, traffic complaints, and lost property. Increases in disturbances and gunshots seen during the last four months of 2018 did not continue in 2019.

Abandoned vehicles

This activity category increased in January and February of 2019, particularly on Routes 291 and 391. As with the other traffic-related categories, this one has a logical and geographic connection with extra traffic in the area.

Disturbance

Increased response to the registry of motor vehicles seems to account for most of the increases in this category.

Drugs

An increase in drug activity in 2019 is difficult to analyze because the police barracks itself is listed as the location for over half of the incidents.

General service

There was a large increase in “assist motorist” calls in 2019, particularly on Route 91 in Northampton and Holyoke. There were also a large number on Reservation Road in Holyoke.

Lost property

The increase is made up of about a dozen incidents taken at the State Police barracks itself at 600 Liberty Street. Unfortunately, the limited information provided in the data doesn't provide any other insights into this call.

Psychological

A big jump in "emotionally disturbed person" and "suicide attempt" calls in 2019, scattered throughout the region with no commonalities.

Traffic complaints

Complaints of aggressive driving and erratic operation increased on state roads in this area, particularly Routes 90 and 91. There are no other concentrations by month, day, or time. This again could be reflective of a general increase in traffic in the area.

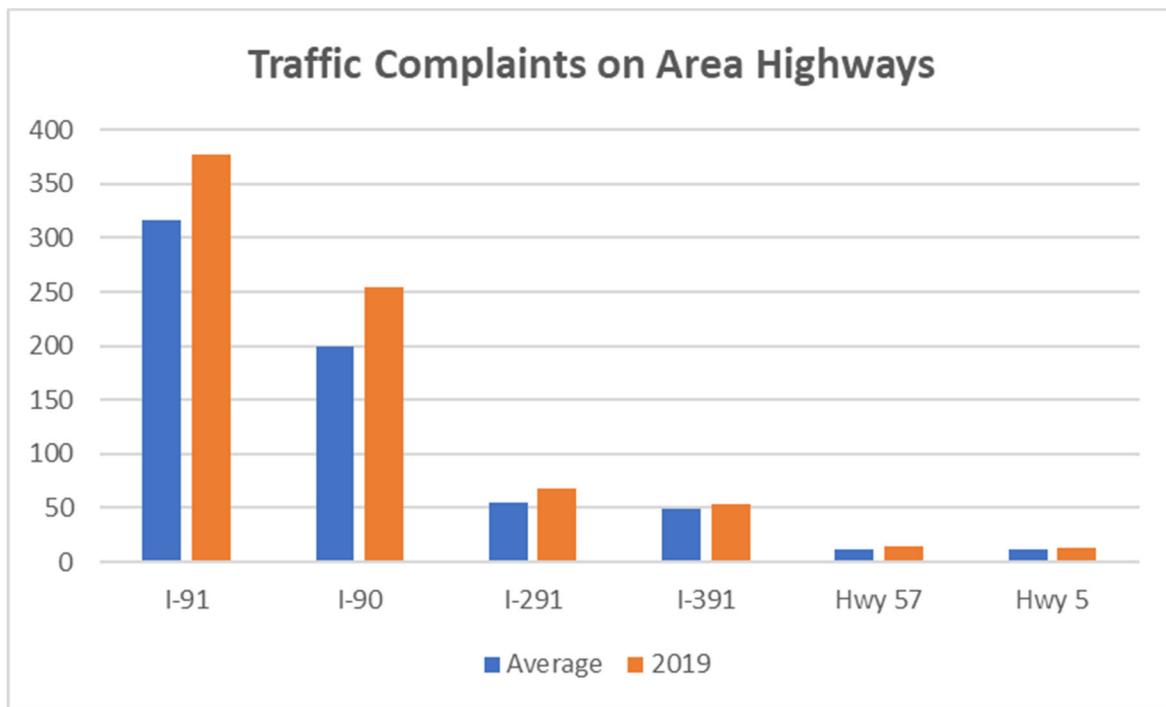


Figure 18: 2019 was marked with extra complaints of erratic driving and aggressive driving on I-91, I-90, and I-291.

Crashes on state roadways, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
I-90	288	4	C	254–322	317	Expected
I-91	972	45	T	997–1303	1059	Expected
I-291	223	3	C	187–259	238	Expected
I-391	166	3	C	152–180	198	High
Hwy 5	109	4	C	83–135	136	High
Hwy 57	65	3	T	66–90	62	Low

Crashes on state roadways had all been within "expected" ranges until the summer of 2019, when I-391 and Hwy 5 hit record-high volumes for the May–August period.

Before-and-after comparison of other variables

Statistics in this section help bolster our understanding of trends in the Springfield area since MGM Springfield opened. It is possible that total volume of particular crimes and calls for service didn't increase, but shifts in other variables happened beneath the surface. For those categories that *did* increase, analysis of these variables can help us understand and explain those increases.

Individuals arrested

Whatever changes happened with crime in the communities, arrests remained essentially at expected values for the region. Agawam was the only agency outside its window, with most of the increase coming April through July of 2019. The agency had a particularly high total of simple assault arrests, as reflected in its statistics for that crime in an earlier section. East Longmeadow and Ludlow balance the Agawam increase by being quite low.

These figures do not include those arrested at MGM Springfield specifically by the State Police, but even if we added them to Springfield's total, the agency would still be within its expected window. MGM Springfield, in short, is not creating any significant burden on the post-police criminal justice system.

Individuals arrested, 1 September–31 August, region

Agency	Pre-MGM Avg.	Slope	Window Type	Pred. Window	2019	Result
Agawam	517	19	C	411–623	699	High
Chicopee	1117	7	C	904–1330	1088	Expected
East Longmeadow	264	38	T	248–524	167	Low
Hampden	121	-10	T	60–128	80	Expected
Holyoke	2936	-177	T	1821–2635	1964	Expected
Longmeadow	93	-10	T	41–74	55	Expected
Ludlow	540	36	T	583–784	582	Low
Northampton	944	-55	T	525–920	655	Expected
Springfield	4621	-53	C	4077–5165	4422	Expected
Wilbraham	596	9	C	473–719	549	Expected
West Springfield	686	-19	T	499–724	711	Expected
Total	12436	-215	T	10444–12711	10972	Expected

Location type

Prior to the opening of MGM Springfield, one common hypothesis is that it would increase activity at the types of places that cater to visitors, such as hotels, gas stations, convenience stores, and transportation hubs. This is not necessarily because we expected that the visiting population would be composed of criminals, but rather a simple recognition that every time you increase the number of people at a location, crimes tend to increase as well.

By and large, this increase has not happened in the first year. Analysis of increases on the preceding pages showed few that were concentrated on specific types of locations. Statistics by type of location below

show that convenience stores, gas stations, banks, hotels, and most retail establishments were well within the predicted window. Restaurant crime actually fell considerably.

The only location type to see an appreciable increase was transportation stations (“air/bus/train terminal”), increasing 40% from its average and reversing a slight decreasing trend. 68% of this volume comes from a single location: Union Station in Springfield. This location saw increases in thefts, fights, and disorderly conduct. As this increase did not start until August, there is a reasonable chance of an MGM connection. We are reaching out to the Amtrak Police to try to get a complete picture of the increases at this location specifically.

Crimes by location type, All offenses, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Air/Bus/Train Terminal	110	-3	C	84–136	165	High
Arena	25	8	T	12–50	16	Expected
Auto Dealership	61	16	T	83–106	82	Low
Bank	360	-3	T	326–367	320	Low
Bar	552	-45	T	291–453	280	Low
Church	188	-13	T	101–183	148	Expected
Construction Site	81	-5	C	55–107	61	Expected
Convenience Store	962	-16	T	794–1007	787	Low
Department Store/Mall	1850	-65	T	1298–1886	1315	Expected
Drug/Doctor/Hospital	758	-1	C	701–815	667	Low
Field/Woods/Park	487	16	T	440–659	438	Low
Gas Station	553	10	C	466–640	556	Expected
Government/Public	1730	1	C	1648–1812	1798	Expected
Grocery	723	1	C	690–756	556	Low
Hotel	529	-19	T	325–584	408	Expected
Jail	36	3	C	19–53	29	Expected
Liquor Store	176	3	C	162–190	126	Low
Office	1711	-96	T	1080–1578	1418	Expected
Parking Lot/Garage	2156	-248	T	941–1580	1255	Expected
Rental Storage	98	1	C	83–113	65	Low
Residence	27828	-661	T	22330–28042	25748	Expected
Restaurant	1009	3	C	916–1102	902	Low
School	1766	-278	T	662–992	883	Expected
Specialty Store	886	-16	C	807–965	724	Low
Street	13992	-343	T	11351–13892	12361	Expected

The only type of location to show unusually high volume overall is transportation terminals—or, in this case, just one terminal: Union Station in Springfield. This re-opened consolidated transportation hub has seen significant volumes of property crime and disorderly conduct in the post-MGM year, and it seems likely that extra train traffic coming to the city to use MGM is at least partly to credit.

Further breakdowns by crime type and specific crime also failed to yield any interesting patterns by location type.

“Last Drink” Locations

According to data received from the Massachusetts Alcoholic Beverages Control Commission, MGM Springfield was named as the location of the “last drink” for **seven** drunk drivers whose cases were adjudicated between 1 August 2019 and 31 January 2020, a number that will likely rise as more cases that resulted in arrest during this period wrap up in court. MGM Springfield is the top single location mentioned by drunk drivers in this dataset, although the many establishments at Foxboro Stadium are divided into different addresses and together make for the top “real” hot spot.

Top “Last Drink” locations from cases adjudicated between 1 July 2019 and 30 January 2020

Location	City/Town	Total
MGM Springfield	Springfield	7
TD Garden	Boston	6
The Still	Agawam	5
The Zone	Springfield	4
Encore Boston Harbor	Everett	4
Scorpion Bar	Foxboro	4
Six String Grill & Stage	Foxboro	4

Whether MGM has a “last drink” problem will become more discernible with more months of data. We will offer a more detailed analysis, as well as counts from the local agencies’ own systems, in the next series of reports for the casino.

Geographic analysis

The preceding sections of this report have presented statistics for the 11 participating communities as a whole. For the most part, they have noted few increases in crime. But it's worth ensuring that some smaller trends aren't being overlooked in amidst the large volume of crime and calls for service reported at the agency level.

Metro Center Springfield

MGM Springfield's official address is 1 MGM Way, a street built specifically for the casino. It occupies about half a block bordered by Union Street, Main Street, State Street, and East Columbus Avenue, its construction having obliterated the middle section of Howard Street, which became a couple of driveways on either side of the building. It is at the southeast end of a busy, downtown Metro Center with dozens of businesses, shops, restaurants, and hotels. Its close neighbors include the Springfield District Court, Symphony Hall, the MassMutual Center, Tower Square, the UMass Center at Springfield, and the CityStage performing arts center, and it's a good bet that all of these businesses stand to do more business with MGM bookending their block. Metro Center ends at roughly Union Station to the northwest, just before Route 291 serves as a natural hard boundary to the neighborhood.

An elevated Route 91 runs to the southwest of MGM and the Metro Center area. On the other side is Riverfront Park and a variety of businesses and attractions along Hall of Fame Avenue, including the Naismith Memorial Basketball Hall of Fame. The Connecticut River serves as a hard boundary to the southwest. Northeast and southeast of the Metro Center, mixed business and residential areas sprawl for miles.

Into this area, we have introduced nearly 6 million visitors in a one-year period. These individuals, their cars, their wallets and purses, their trusting natures, are all potential targets for thieves, robbers, con artists, and more. The patrons themselves will occasionally drink too much, talk too loudly, get into fights, and get arrested for disorderly conduct. But at the same time, there are crime suppressors. There are plenty of people to witness criminal activity, to serve as mutual guardians for each other. There are dozens of law enforcement officers and security guards within shouting distance, and cameras covering most of the major streets. Nearby businesses are staying open later. Late at night, the streets aren't quite as dark or empty. Which factors win out? The attractors or the suppressors?

For this analysis, we will consider three geographies:

1. The immediate MGM block, including both sides of Main, State, and Union Streets and East Columbus Avenue, but excluding the casino building itself, as there was nothing there but a construction site before September.
2. The larger Metro Center area surrounding MGM, southeast to the Basketball Hall of Fame and northwest to Union Station.
3. The mixed business/residential neighborhoods that surround the Metro Center.

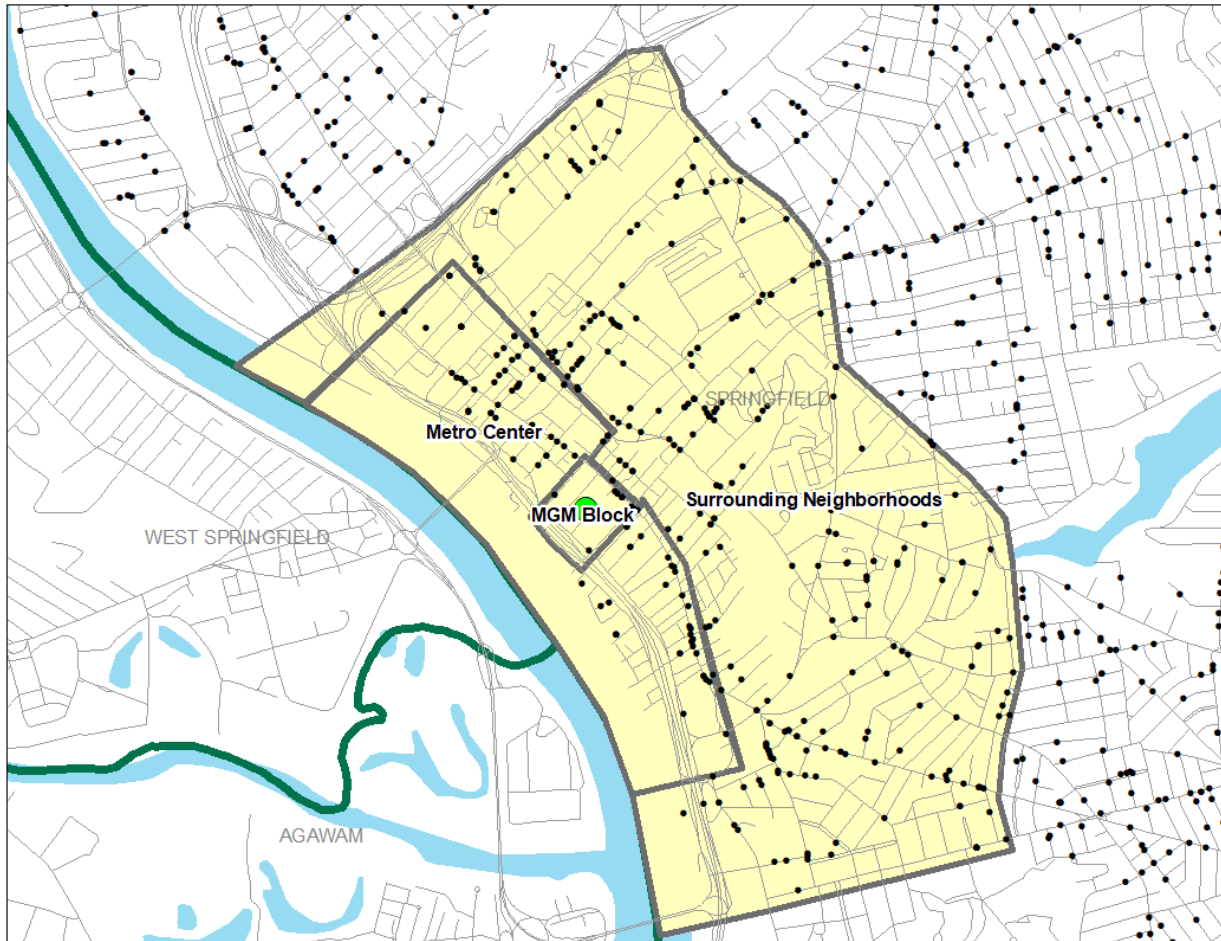


Figure 19: The three geographies analyzed in this section. Borders take in both sides of major streets.

To avoid wasting time with very low numbers, I have eliminated (put into the "All Other" category) crimes that reported an average and 2019 figure of less than 2.

Crimes on the MGM block, 1 September–31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Sexual Assault	1	0	C	0–2	2	Expected
Robbery	5	-1	T	1–7	1	Expected
Aggravated Assault	4	0	C	2–6	4	Expected
Simple Assault	15	-1	T	6–18	12	Expected
Threats	7	0	C	4–10	7	Expected
Burglary	6	0	C	3–9	0	Low
Shoplifting	1	0	C	0–3	3	Expected
Theft from Building	4	-1	C	0–8	1	Expected
Theft from Vehicle	12	-1	C	6–18	10	Expected
Other Theft	19	-5	T	2–18	2	Expected
Auto Theft	3	-1	T	0–3	6	High

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Forgery	2	-1	T	0-2	0	Expected
Vandalism	8	0	C	4-12	3	Low
Drugs	3	0	C	1-6	2	Expected
Prostitution	3	-1	C	0-6	1	Expected
Disorderly	5	1	C	2-8	9	High
All other	9	0	C	5-13	13	Expected
Total	108	-9	T	51-107	77	Expected

A mix. Total crime remained almost unchanged on the block. Burglary has been suppressed. Some disorderly patrons have spilled onto the street. Overall, it appears that suppressors and attractors are canceling each other out on the immediate MGM block, resulting in average crime totals.

Four of the six auto thefts during this period were at the Pride gas station at 1211 East Columbus. The Pride station was the only individual address on the block to show significantly more incidents in 2019 than in previous years (23 vs. an average of 10). The location is also the site of all three of the shoplifting incidents reported on the block, three assaults, four threats, and an abduction. There are no specific times of day or days of week for these varied incidents.

Crimes in the Metro Center, 1 September-31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	1	0	C	0-2	1	Expected
Sexual Assault	8	0	C	5-11	15	High
Kidnapping	3	1	C	1-6	6	Expected
Robbery	59	-3	C	45-73	48	Expected
Aggravated Assault	75	-1	C	64-86	61	Low
Simple Assault	209	0	C	175-243	183	Expected
Threats	94	-2	C	82-106	84	Expected
Arson	2	0	C	1-3	0	Low
Burglary	65	-8	T	31-41	36	Expected
Theft from Persons	7	0	C	1-14	6	Expected
Purse-Snatching	2	-1	T	0-4	2	Expected
Shoplifting	24	7	T	42-60	28	Low
Theft from Building	57	-1	C	37-77	70	Expected
Theft from Machine	2	1	T	3-9	4	Expected
Theft from Vehicle	104	-5	C	75-133	82	Expected
Theft of MV Parts	8	3	T	8-19	10	Expected
Other Theft	201	-49	T	43-102	45	Expected
Auto Theft	36	-2	T	18-38	29	Expected
Forgery	16	-1	T	10-17	20	High
Fraud	20	-1	C	16-24	24	Expected
Credit Card Fraud	8	3	T	15-21	16	Expected
Identity Theft	11	-1	T	6-11	10	Expected
Employee Theft	3	0	C	0-6	5	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Extortion	0	0	C	0-1	1	Expected
Stolen Property	10	0	C	6-14	12	Expected
Vandalism	134	-4	C	111-157	109	Low
Drugs	60	0	C	39-81	50	Expected
Statutory Rape	0	0	T	0-0	0	Expected
Pornography	0	0	T	0-0	0	Expected
Prostitution	24	-1	C	11-37	6	Low
Weapons	20	2	C	11-29	24	Expected
Bad Checks	4	-1	T	1-5	1	Expected
Disorderly	62	-8	T	30-68	55	Expected
Drunk Driving	7	-1	T	3-6	3	Expected
Drunkenness	2	0	C	0-4	1	Expected
Family Offenses	4	3	T	4-25	21	Expected
Liquor Laws	5	-1	T	2-6	2	Expected
Trespassing	28	1	C	20-36	28	Expected
Violent Crime	449	-5	C	405-493	398	Low
Property Crime	710	-59	T	414-586	509	Expected
Total Crime	1374	-42	T	1009-1305	1098	Expected

We see basically the same story. An extra 10-15,000 people a day has caused crime to barely budge. Burglary is notably down for area businesses, but thefts from their buildings during the daytime is up; perhaps thieves are looking for unattended purses and wallets in food courts, meeting rooms, and open offices. (L.A. Fitness, a laundromat, and Union Station have all been hit multiple times.) Vice, drugs, liquor, and prostitution are absent or keeping a low profile.

One major concern is an increase in sexual assaults in the area, particularly a concentration of eight reported between May and August 2019. I am unable to analyze these in detail because of limited information provided for this sensitive crime type. The Springfield Police Department's crime analysis unit reported no commonalities among a list of incidents in the area that I did provide.

Crimes in the surrounding neighborhoods, 1 September-31 August

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Murder	4	0	C	2-7	5	Expected
Sexual Assault	43	-1	C	33-53	40	Expected
Kidnapping	13	0	C	10-16	16	Expected
Robbery	159	1	C	141-177	128	Low
Aggravated Assault	266	-4	C	245-287	233	Low
Simple Assault	784	-11	C	707-861	698	Low
Threats	424	-7	C	389-459	342	Low
Arson	9	-1	C	3-15	3	Expected
Burglary	308	-32	T	167-239	149	Low
Theft from Persons	14	1	C	5-23	16	Expected
Purse-Snatching	4	-1	T	1-5	5	Expected

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
Shoplifting	26	6	T	42-59	43	Expected
Theft from Building	176	-5	C	113-239	185	Expected
Theft from Machine	3	2	T	4-16	8	Expected
Theft from Vehicle	257	-19	T	156-262	194	Expected
Theft of MV Parts	38	15	T	60-108	51	Low
Other Theft	582	-148	T	122-214	127	Expected
Auto Theft	138	-5	T	98-139	122	Expected
Forgery	30	-1	C	21-39	33	Expected
Fraud	50	-1	C	41-59	54	Expected
Credit Card Fraud	22	7	T	36-53	44	Expected
Identity Theft	76	-10	T	34-59	49	Expected
Employee Theft	7	0	C	6-8	6	Expected
Extortion	1	0	T	0-3	8	High
Stolen Property	33	-1	T	23-35	28	Expected
Vandalism	493	-13	T	360-521	411	Expected
Drugs	226	9	C	172-280	184	Expected
Statutory Rape	2	-1	T	0-4	2	Expected
Pornography	3	0	C	1-6	6	Expected
Prostitution	39	-6	T	22-50	22	Expected
Weapons	98	6	T	83-157	122	Expected
Bad Checks	7	-1	T	2-6	1	Low
Disorderly	138	-12	T	80-139	110	Expected
Drunk Driving	16	-2	T	7-16	12	Expected
Drunkenness	3	-1	T	0-5	2	Expected
Family Offenses	31	19	T	41-139	111	Expected
Liquor Laws	14	1	C	9-19	11	Expected
Trespassing	105	12	T	112-189	124	Expected
Violent Crime	1692	-20	T	1487-1737	1462	Low
Property Crime	2266	-204	T	1327-1625	1536	Expected
Total	4638	-131	T	3627-4391	3705	Expected

Crime is down in the surrounding mixed residential/business neighborhoods—the lowest level in at least 9 years. Violent crime and burglaries are particularly low. Thefts from vehicles have increased elsewhere, but not here.. Overall, the statistics suggest that the influence of the casino is largely contained to its immediate area.

Exit Radiuses

One of the original hypotheses of this study was that crime would increase at facilities near highway exits to and from MGM Springfield. Such a trend did not come to pass. Whether we consider all exit radiuses and individual crime, or individual radiuses and all crimes, no combination outperforms its expected values for the period.

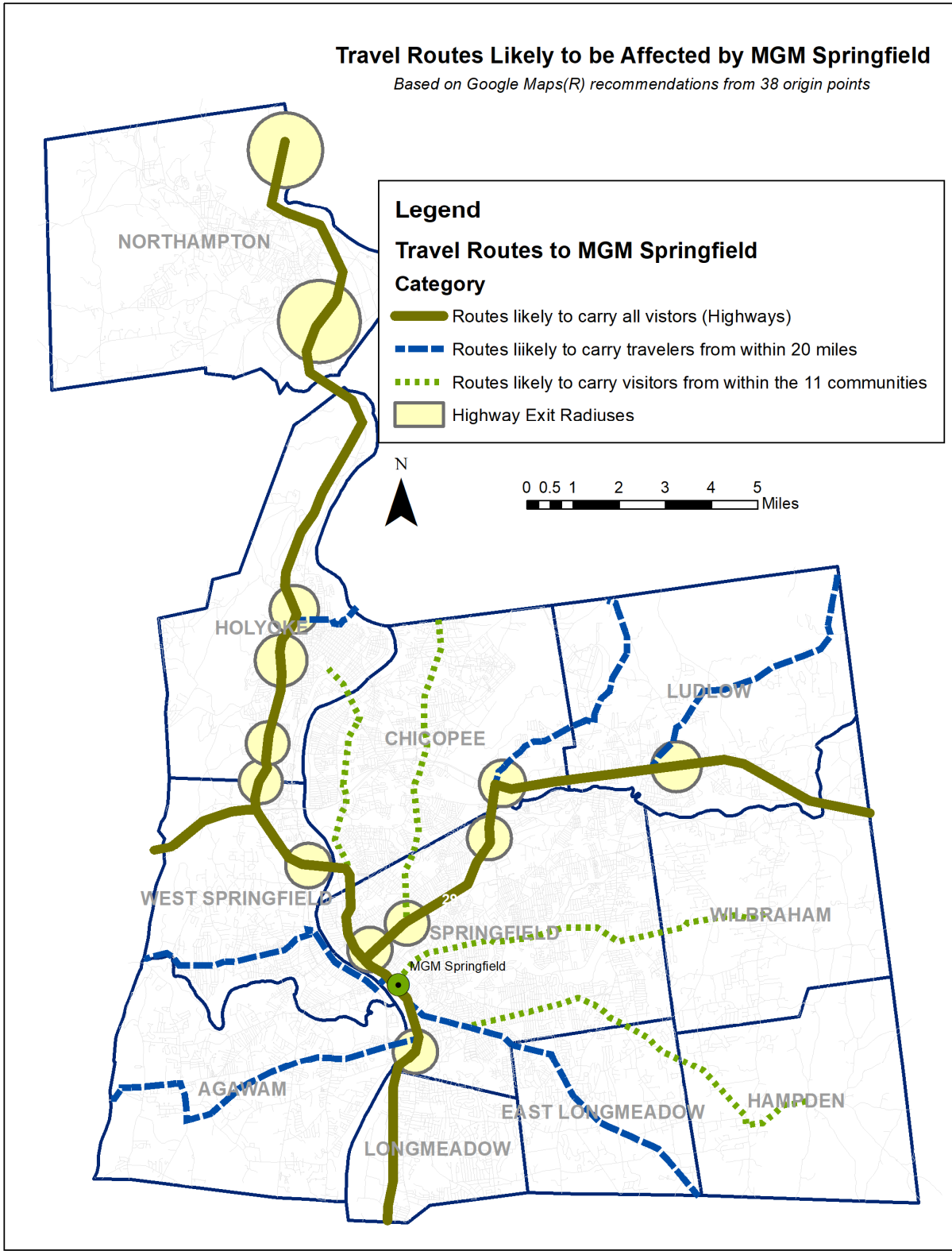


Figure 20: An analysis of crimes and calls for service only in "exit radiuses" shows no category higher than their expected values.

Crimes in exit radiuses, September 2018–August 2019

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
CH 90 Exit 6	66	-8	T	27–54	48	Expected
HO 91 Exit 15	806	-41	T	579–707	684	Expected
HO 91 Exit 16	329	-8	C	287–371	218	Low
HO 91 Exit 17	191	-12	T	105–206	155	Expected
LU 90 Exit 7	201	-1	C	172–230	149	Low
NH 91 Exit 18	503	-41	T	289–392	357	Expected
NH 91 Exit 21	16	0	C	7–25	4	Low
SP 291 Exit 3	848	-48	T	548–767	708	Expected
SP 291 Exit 5	109	-10	T	63–98	84	Expected
SP 91 Exit 2	77	3	C	62–92	41	Low
SP 91 Exit 9	801	-41	T	515–791	771	Expected
WS 91 Exit 13	464	9	C	414–514	459	Expected
Total	4411	-197	T	3299–3949	3678	Expected

The same is true of calls for service. The table below lists all reactive calls for service in the same exit radiuses and finds no indication of higher activity based on extra commuting traffic.

Calls for service in exit radiuses, September 2018–August 2019

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
CH 90 Exit 6	458	0	C	344–572	469	Expected
HO 91 Exit 15	1785	-26	T	1552–1809	1557	Expected
HO 91 Exit 16	1803	18	C	1704–1902	1732	Expected
HO 91 Exit 17	1101	-20	C	1002–1200	1134	Expected
LU 90 Exit 7	1847	101	T	1966–2536	2048	Expected
NH 91 Exit 18	4048	-93	T	3215–4136	3767	Expected
NH 91 Exit 21	157	4	C	130–184	153	Expected
SP 291 Exit 3	3918	218	T	4220–5362	4751	Expected
SP 291 Exit 5	731	32	T	680–1037	866	Expected
SP 91 Exit 2	502	34	T	575–701	558	Low
SP 91 Exit 9	3957	295	T	4575–5702	4856	Expected
WS 91 Exit 13	1729	28	T	1737–1944	1905	Expected
Total	22036	591	T	22417–26383	23796	Expected

A similar analysis based on count of crashes finds *one* anomaly: the radius around Exit 13 from Route 91 in West Springfield. This is consistent with previous data showing that West Springfield in general had a higher incidence of traffic collisions during the year after MGM opened.

Crashes in exit radiuses, September 2018–August 2019

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
CH 90 Exit 6	57	5	T	41–116	55	Expected
HO 91 Exit 15	183	2	C	163–203	158	Low

Category	Pre-MGM Avg	Slope	Window Type	Pred. Window	2019	Result
HO 91 Exit 16	121	4	C	99-143	118	Expected
HO 91 Exit 17	87	3	T	85-114	89	Expected
LU 90 Exit 7	153	16	T	191-245	194	Expected
NH 91 Exit 18	87	-2	C	78-96	59	Low
NH 91 Exit 21	7	0	C	4-12	11	Expected
SP 291 Exit 3	186	9	T	163-279	227	Expected
SP 291 Exit 5	81	6	T	76-130	97	Expected
SP 91 Exit 2	36	3	T	31-63	29	Low
SP 91 Exit 9	195	11	T	169-308	217	Expected
WS 91 Exit 13	81	-3	C	67-95	116	High
Total	1276	54	T	1318-1666	1370	Expected

Conclusion and future plans

This report being a 12-month scan, there are several datasets yet unavailable that will allow us to expand this analysis in future reports. As time passes, we will be able to incorporate the following:

- An analysis of transit crime through the cooperation of the Amtrak Police.
- An analysis of changes in the MGM Springfield area compared to control areas and the rest of the state. This will become possible when a full set of statewide NIBRS data is available, probably in early 2020.
- A comparative analysis of traffic collisions in the Springfield area versus control areas. This probably will not be possible until a public statewide crash dataset is available, likely in 2021.
- Comparison of MGM Springfield with other casinos, normalized by the number of annual visitors each facility receives. We are currently the process of collecting data from comparison casinos nationwide.
- An analysis of the influence of special events at MGM on the surrounding communities on those event nights.
- An analysis of activity at specific hotels in the region.

The Massachusetts Gaming Commission and author of this report have both received a number of questions from partners and stakeholders concerning the possible growth of human trafficking, particularly sex trafficking, in the area. Police statistics are a poor measure of “hidden” crimes like human trafficking, and thus we must look to more creative ways to blend information and intelligence from a variety of sources. To this end, the MGC will be commissioning a meeting of experts to discuss the issue, and to hopefully create an analytical process that will allow us to report better on this potential phenomenon in future reports.

Appendix: Abbreviations and definitions

Acronyms and abbreviations

CAD	Computer-aided Dispatch (system)	A police database that holds information about police dispatches to calls for service, including incidents discovered by police officers. Some but not all of the incidents reported in CAD are crimes and have longer records in the RMS.
IBR	Incident-based reporting	See NIBRS.
MGC	Massachusetts Gaming Commission	The commonwealth agency charged with overseeing and regulating gaming in Massachusetts
FBI	Federal Bureau of Investigation	National investigative agency, part of the U.S. Department of Justice, in charge of collecting national crime statistics.
IACA	International Association of Crime Analysts	A global nonprofit professional association that provides training, literature, and networking to individuals who analyze crime data.
MACA	Massachusetts Association of Crime Analysts	A nonprofit professional association that provides training, literature, and networking to individuals who analyze crime data in New England.
NIBRS	National Incident-based Reporting System	FBI program for data collection that supersedes UCR. Collects more specific data about a wider variety of crimes. With only a few exceptions, all Massachusetts agencies report to NIBRS and all Massachusetts RMS vendors have implemented NIBRS coding standards.
ODBC	Open Database Connectivity	A technology developed by Microsoft that allows any application that uses a database to connect to any database source. The primary mechanism by which we can extract data from police CAD and RMS databases.
PPC	Plainridge Park Casino	Massachusetts's first casino, a slot machine-only parlor in Plainville, opened in June 2015.
PVTA	Pioneer Valley Transit Authority	The organization that operates bus service and other public transportation in western Massachusetts.
RMS	Records Management System	A police data system that stores information about crimes and offenders. See also CAD.

SEIGMA	Social and Economic Impacts of Gaming in Massachusetts	A multi-year research project hosted by the University of Massachusetts Amherst School of Public and Health Sciences. The SEIGMA project has a much broader mandate for its study than just crime.
UCR	Uniform Crime Reporting (program)	National program for the reporting of crime statistics to the FBI. Captures only summary data about a limited number of crime types. Contrast with NIBRS.

Crime definitions

The following are definitions of the crime categories used in this report. These are mostly drawn without modification from the FBI’s definitions for NIBRS crime categories. In almost all cases, *attempts* to commit these crimes are counted equally with completed offenses. These crimes must, of course, be reported to the police to be included in this report.

Aggravated Assault: An attack by one person upon another for the purpose of inflicting severe bodily injury. Aggravated assault is either accompanied by the use of a deadly weapon (e.g., gun, knife, club) or some mechanism that would result in serious harm (e.g., pushing someone down a staircase), or by serious injury even with a weapon that isn’t normally “deadly” (e.g., punching someone and breaking his jaw). If the incident involved neither a deadly weapon nor serious injury, it’s coded as a simple assault instead.

Arson: Intentional burning of a structure, vehicle, or personal property.

Auto theft: Thefts of vehicles capable of operating under their own power, including automobiles, trucks, buses, motorcycles, and snowmobiles.

Bad checks: The issuance of checks on accounts with insufficient funds. This type of crime is typically only reported by police when an arrest is made or an individual is charged.

Burglary: Unlawful entry of a structure, including residences, commercial buildings, and government buildings. The entry does not have to occur by force (e.g., a “break-in”). The usual motive for burglary is to steal something inside, but this isn’t a necessary part of the definition.

Counterfeiting/forgery: Use or possession of an altered, copied, or imitated negotiable or non-negotiable instrument, including U.S. currency, checks, and money orders.

Credit card fraud: Use of a stolen credit card or credit card data to obtain goods or services.

Disorderly: Disorderly conduct that rises to the level of a criminal charge.

Drug offenses: Manufacturing, sale, trafficking, transporting, or possession of controlled substances. Typically, “incidents” of such crime are arrests, as the only way such incidents are reported is when they are discovered by the police.

Drunk driving: Operation of a motor vehicle while intoxicated; usually while above a state-designated legal blood alcohol level. As with many of the drug and alcohol categories, such incidents are only reported when discovered by the police, usually resulting in an arrest.

Drunkness: Naturally, not all incidents of intoxication are a police matter. Police incidents that fall into this category are usually incidents of either public intoxication or individuals so dangerously intoxicated that they are placed into protective custody until sober.

Employee theft: Also, "embezzlement." Theft of an employer's property by an employee.

Extortion: Theft or attempted theft of money, goods, or services through non-violent coercion.

Family offenses: Unlawful, nonviolent acts by a family member that threaten the physical, mental, or economic well-being of another family member and are not classified under any other category. This category is only reported when someone is charged, and it almost always involves violations of restraining orders or child neglect.

Forgery: Forgery of personal checks, business checks, U.S. currency, or similar negotiable and nonnegotiable documents.

Fraud. Theft of property by lying in such a way that convinces a victim to surrender money or goods. It is theft through some kind of scheme, "con game," or ruse.

Gambling offenses: Crimes related to illegal gambling, promoting gambling, operating gambling machines, bookmaking, and sports tampering.

Identity theft: Representation of oneself as another (actual) person or use of another person's identifying information to obtain goods or services, housing, medical care, or status.

Kidnapping: The abduction of one person by another, whether through force or guile. Most incidents coded as such as "custodial" kidnappings involving a parent taking a child in violation of a custodial agreement.

Liquor law violations: Illegal manufacturing, sale, possession, or consumption of intoxicating drinks, often because the offender is below the legal age.

Murder: the killing of one person by another, including non-negligent homicides.

Other thefts: A general category that includes thefts of services (e.g., gas drive-offs), thefts from persons (e.g., pocket-picking), thefts from outdoor public areas. Essentially, any non-burglary, non-robbery theft that is not covered in one of the "theft" or "shoplifting" categories (below) is categorized here.

Pornography: Possession, sale, or manufacturing of illegal pornography. Because pornography is legal in Massachusetts, such incidents generally involve minors, either as the subjects or recipients of the pornography.

Property crime: An aggregate category that sums the totals of arson, burglary, thefts from persons, purse snatching, shoplifting, thefts from buildings, thefts from machines, thefts from vehicles, thefts of vehicle parts, other theft, auto theft, forgery, fraud, credit card fraud, identity theft, employee theft, extortion, stolen property, and vandalism.

Prostitution: Promotion or participation of sexual activities for profit. As with drug offenses, most "incidents" of prostitution are arrests, as the crime is rarely reported except when discovered by the police.

Purse snatching: A theft in which an offender grabs a purse off the arm of the victim. If any significant force, violence, or threats are employed, this crime becomes a robbery.

Robbery: Taking or attempting to take anything of value from another person by force or violence or threat of force or violence. "Muggings" and "hold-ups" are examples of robberies. A robbery requires a direct confrontation between the offender and victim; houses and buildings cannot be "robbed."

Sexual assault: Any sexual act directed against another person (of either sex), either by force or otherwise against the person's will, or non-forcibly but when the victim is incapable of giving consent because of temporary or permanent mental or physical incapacity. This category combines rapes, indecent assaults, molestation, and sexual penetration with an object.

Shoplifting: Thefts of items offered for sale at retail establishments.

Simple assault: An assault that does not involve a dangerous weapon and does not result in significant injury.

Statutory rape: Nonforcible sexual activity with an individual who is unable to give legal consent because of age.

Stolen property offenses: Possession or sale of property previously stolen including motor vehicles and personal property. Often, the person possessing the property is the one who stole it in the first place, but this category is used when the actual thief cannot be determined.

Thefts from buildings: Thefts of items from commercial or government buildings open to the public, where such entry does not constitute burglary. This often takes the form of thefts of employees' property at businesses open to the public.

Thefts from machines: Thefts from coin-operated machines, either for the coins or for the products inside.

Thefts from persons: Thefts of personal property from the direct control of the owner. These often take the form of pocket-pickings or thefts of or from diners' purses at restaurants. If any force, violence, or threats are employed, this crime becomes a robbery.

Thefts from vehicles: Thefts of items from motor vehicles. The category includes breaking into vehicles (e.g., smashing a window), unlocked entry, and thefts of items from a vehicle's exterior, such as pickup truck beds. Note that thefts of vehicle parts are in a separate category.

Thefts of vehicle parts: Theft of parts or accessories from motor vehicles, including wheels, license plates, and engine parts.

Threats: Threats to commit physical violence by one person against another. If any weapon is actually displayed or employed, or if an assault is actually attempted, the crime is categorized as a simple or aggravated assault instead.

Trespassing: Illegal entry to a non-public part of a residence or business. Such entry is rarely to the *interior* of the property, or it would be coded as burglary instead. Most reportable incidents of trespassing are either after notice (e.g., a repeat shoplifter who is ordered not to return to a store) or at posted locations (e.g., construction sites, abandoned buildings).

Vandalism: Destruction or defacement of public property, buildings, vehicles, or personal property.

Violent crime: An aggregate category that sums totals for murder, sexual assault, kidnapping, robbery, aggravated assault, simple assault, and threats.

Weapon offenses: Possession, sale, or manufacturing of illegal weapons. This is often an additional offense discovered by police during arrests for other crimes.

Call for service definitions

Calls for service include both criminal and noncriminal police incidents and activities. In the case of criminal activities, such incidents receive a longer, more detailed report in the police records management system, and it so it makes more sense to analyze them using the crime categories above than in their original call-for-service form. Thus, the only incident types we have selected for analysis in this report are noncriminal. Definitions of those types appear below. Because the police officer does not usually write a full report for calls for service, the dataset available for analysis is more limited.

Administrative: A wide variety of call types that have to do with the administration of a police department, such as delivery of documents to businesses or other government facilities, attendance at meetings, vehicle maintenance, or even meal breaks. Agencies use their call-for-service systems to document such activities so that, later, they can determine what a particular officer or unit was doing at a particular time, although the incidents are not truly “calls for service.” Practices differ significantly between police agencies as to what is reported under this category, and it is generally not useful for analysis.

Alarm: A burglar, panic, or medical alarm that required a response but (probably) turned out to be false or would have a different final code.

Animal complaint: Calls involving sick, dangerous, or wild animals, animals in danger (e.g., left in a hot or cold car), or loose or noisy pets.

Assist other agency: A call type that involves rendering aid to a neighboring police or other government agency for any number of purposes, including serious crimes, fire and medical issues, and traffic issues.

Crime enforcement: Any number of pro-active police activities meant to deter crime, generally taking the form of a “directed patrol” to a particular location during a peak time for criminal activity (based either on citizen complaints or internal analysis). Though not a technical “call for service,” such incidents are recorded in the CAD database to document the officer’s activity.

Disabled vehicle: A call for service for a vehicle suffering physical or mechanical trouble, usually broken down in an active roadway.

Disturbance: Any of a variety of types of disorderly conduct, disputes, fights, and excessive noise.

Domestic dispute: A dispute between family members, spouses, or intimate partners that has not risen to the level of physical violence.

General service: Minor calls for service that involve rendering aid to residents and visitors for a variety of issues such as giving directions, installing car seats, dealing with lockouts, and providing physical aid.

Gunshots: Reports of gunshots fired, whether phoned in by a resident or received from automatic detection services.

Hunting: Reports of hunters hunting off-season, in protected areas, with illegal gear, or in an unsafe manner.

Lost property: Calls for service involving lost personal property such as wallets and mobile phones. If there is any indication of theft, these incidents are typically reported under the appropriate crime category.

Medical aid: All calls for medical aids except unattended deaths and overdoses. Police responses only are included in the figures in this report.

Missing person: a runaway or other missing person.

Prisoner transport: documentation of a police agency transporting an arrested person from one facility to another.

Psychological issue: Calls for service involving individuals with mental health issues.

Suspicious activity: Any suspicious person, vehicle, or other activity, whether identified by an officer or citizen.

Traffic collision: A collision involving at least one motor vehicle.

Traffic complaint: Complaint about reckless driving, illegal or unsafe parking, or other traffic issues.

Trespassing: Trespassing on private or public property.

Vehicle stop: An officer pulls over a vehicle for a moving or equipment violation.

Warrant service: a call type that documents the service, or attempted service, of an arrest warrant or search warrant. The category is entirely police-directed.

Youth disorder: Disorderly incidents involving youths congregating, skateboarding, making noise, and so forth.

Offense types by associated crime category

Offense	Category
Aggravated Assault	Violent Crime
All Other	Other Crime
Arson	Property Crime
Auto Theft	Property Crime
Bad Checks	Property Crime
Burglary	Property Crime
Credit Card Fraud	Property Crime
Disorderly	Societal Crime
Drug Equipment Offense	Drug/Alcohol Crime
Drug Offense	Drug/Alcohol Crime
Drunk Driving	Drug/Alcohol Crime
Drunkenness	Drug/Alcohol Crime
Employee Theft	Property Crime
Extortion	Property Crime
Family Offenses	Other Crime
Forgery	Property Crime
Fraud/Con Games	Property Crime
Gambling	Societal Crime
Identity Theft	Property Crime
Kidnapping	Violent Crime

Offense	Category
Liquor Law Violations	Drug/Alcohol Crime
Murder	Violent Crime
Other Thefts	Property Crime
Peeping Tom	Other Crime
Pornography	Societal Crime
Prostitution	Societal Crime
Robbery	Violent Crime
Runaway	Other Crime
Sexual Assault	Violent Crime
Shoplifting	Property Crime
Simple Assault	Violent Crime
Statutory Rape	Other Crime
Stolen Property Offense	Property Crime
Thefts from Buildings	Property Crime
Thefts from Vehicles	Property Crime
Thefts of Vehicle Parts	Property Crime
Threats	Violent Crime
Trespassing	Other Crime
Vandalism	Property Crime
Weapon Offenses	Societal Crime

TK final pagination



TO: Chair Judd-Stein, Commissioners O'Brien, Cameron, Stebbins and Zuniga
FROM: John Ziembra, Joe Delaney
CC: Karen Wells, Interim Executive Director
DATE: February 21, 2020
RE: MGM Springfield Residential Requirements and Requested Approvals

Requested Approvals: As you are aware, at the February 13, 2020 Commission meeting, MGM Springfield, joined by representatives from the City of Springfield and the Executive Office for Administration and Finance, provided a briefing regarding the status of MGM Springfield's commitment to provide 54 market-rate apartments within one-half mile of the MGM Springfield casino.

MGM Springfield provided a letter to the Commission that detailed the status of the plan to develop these residential units at 31 Elm Street in Springfield and detailed steps that would be need to be taken to enable that project to move forward. In this letter, MGM Springfield stated that "in order to finalize MGM's participation in the 31 Elm Development" one of the necessary steps is "[t]he Commission's approval of compliance with the HCA, as amended, as satisfying its relevant housing development commitment." In addition to the letter, MGM Springfield provided a proposed Grant Agreement between MGM Springfield and the City of Springfield ("Grant Agreement") ([Attachment A](#)) and a proposed Fifth Amendment to the Host Community Agreement ("Fifth Amendment") ([Attachment B](#)). The proposed Grant Agreement states, in relevant part, that it shall become effective upon the satisfaction of several conditions including a condition that "the Massachusetts Gaming Commission notifies the City and the Grantor that the Fifth Amendment satisfies the Grantor's housing obligation under its Category 1 license." The Fifth Amendment states in relevant part that "[t]his Amendment shall not be effective unless and until the Commission notifies the City and MGM that Blue Tarp's funding of the MGM Contribution pursuant to the Cooperative Agreement satisfies MGM's housing obligation under its Category 1 license."¹

¹ The term "Cooperative Agreement" refers to a certain cooperative agreement...by and among the City, Blue Tarp, 31Elm LLC, the Springfield Redevelopment Authority, and certain other parties" which will specify that "Blue Tarp shall contribute Sixteen Million Dollars ... to be used by 31 Elm LLC ... along with funds from other sources as set forth in the Cooperative Agreement, to fund the redevelopment of 3-7 Elm Street and 13-31 Elm Street ... which redevelopment will result in the construction of approximately 59 market rate, upscale apartment units, 15 workforce apartments and approximately 12,000 square feet of retail/restaurant space..."



Massachusetts Gaming Commission

The proposed Fifth Amendment deletes the Residential paragraph in Exhibit G of the HCA (which requires MGM Springfield to construct such 54 market-rate apartments). In its place, a new paragraph is inserted that states (see Attachment B for exact language) that Blue Tarp shall enter into a cooperative agreement no later than March 31, 2020 (or a later date determined by the Mayor of Springfield), that Blue Tarp shall contribute \$16,000,000 to fund the redevelopment project, and that prior to the execution date of the Cooperative Agreement, Blue Tarp shall enter into a grant agreement with the Springfield Redevelopment Authority. The Fifth Amendment also states that Blue Tarp shall be required to contribute up to \$11,000,000 plus interest to a Downtown Springfield Market Rate Housing Fund under certain circumstances (such as if the Cooperative Agreement is not signed by all parties by the Execution Date).

MGM Springfield Residential Requirements. Below please find further information regarding the specific Commission requirements that would need to be considered in evaluating the requested approvals relating to MGM Springfield’s commitment to the 54 residential units.

Construction Timeline. The Commission’s regulations (205 CMR 135.02 (2)(a)) state that “[t]he commission shall, in accordance with M.G.L. c. 23K, §§ 10 and 11 approve for each gaming licensee, a project schedule for the gaming licensee’s capital investment in its gaming establishment and related infrastructure which includes: (a) all major stages of design and construction; including all permitting and approvals, design deliverables, site preparation, foundation, structure, plumbing, electrical, mechanical, exterior finish and fenestration, long lead items, insulation, interior finish and furnishings and landscaping, building commissioning and commissioning of gaming equipment and information technology systems.”

On April 12, 2018, pursuant to 205 CMR 135.02(2)(a), the Commission approved MGM Springfield’s detailed construction schedule, which included a March 2020 deadline for the construction of the 54 market-rate units.² As part of the approval, the Commission established several conditions.

1. MGM Springfield shall provide the quarterly reports to the Commission under the requirement that the project includes no less than 54 newly developed market rate units within one-half mile of the casino;
2. MGM Springfield shall by March 1, 2019 provide a final commitment and documentation for the 31 Elm Street project, along with a realistic construction time line from the city;

² Pursuant to the Third Amendment to the HCA, “[n]o less than 54 newly developed market rate higher end upscale urban apartment units owned, operated and/or branded by Developer in pedestrian scaled buildings within one-half (1/2) mile of the boundaries of the Project Site, all of with units are to be available for occupancy within 18 months [March 2020] after the Operations Commencement Date.”

3. If MGM Springfield cannot meet condition #2 by March 1, 2019, MGM Springfield shall proceed with an independent residential development requirement within the time line set forth in the host community agreement to be completed by March, 2020;
4. MGM Springfield shall inform the Commission of any material event that will significantly alter the potential that MGM Springfield will proceed with the City's plan to rehabilitate 31 Elm Street in Springfield with assistance provided by MGM Springfield; and
5. MGM Springfield will provide a construction security mechanism, bond or escrow agreement satisfactory to the Commission for the construction of an off-site residential units and Dave's Retail building on the corner of Main Street and Union Street.

As it became clear that further efforts would be necessary to move forward with the potential 31 Elm Street project, MGM Springfield and the City of Springfield asked for an extension to the March 1, 2019 deadline (See Condition #3 in red). On March 28, 2019, the Commission approved the request for an extension for the 31 Elm Street construction project, subject to specified conditions.³

Under the proposed Fifth Amendment, MGM Springfield (Blue Tarp) would no longer be required to build the 54 market rate units. Instead, MGM Springfield would make a \$16 million contribution to the proposed 31 Elm Street development, or, in the alternative under certain specified circumstances, would be required to contribute at least \$11 million to the Downtown Springfield Housing Fund. If the Commission determines that this contribution satisfies MGM Springfield's residential obligations, the Commission would need to reconsider its prior determinations regarding the construction schedule. The Commission could amend its construction timeline to reflect the contribution dates specified in the Fifth Amendment, Grant Agreement, and the Cooperative Agreement. For example, the whereas clauses of the Fifth Amendment states that "Blue Tarp has agreed to fund the MGM Contribution in lieu of the Housing Obligation" and that "the MGM Contribution, when fully funded, will satisfy the Housing Obligation." (underlining added).

As outlined in the draft Cooperative Agreement, MGM will make two payments into a development fund being held by MassHousing for the 31 Elm Street project. The first payment of \$4,000,000 will be made at the conveyance of the property to the Developer with the second

³ The conditions stated that: 1. MGM Springfield shall not be required to comply with item number three of [in red above] the Commission's motion regarding MGM Springfield's construction schedule dated April 12th, 2018, until further advised by the Commission; 2. As required under the approved construction schedule, MGM Springfield shall continue to inform the Commission of any material event that would significantly alter the potential of MGM Springfield proceeding with the City's plan to rehabilitate 31 Elm Street in Springfield with assistance provided by MGM Springfield; 3. Staff shall remain in regular contact with MGM Springfield and the City of Springfield to monitor the progress of the 31 Elm Street project, its documentation, and its schedule and report back to the Commission at an appropriate time; and 4. MGM will provide an update at its quarterly report for the first quarter.

payment of \$12,000,000 being made no later than January 8, 2021. The Cooperative Agreement further states that the agreement can be terminated if the Developer has not commenced a continuous program of construction within thirty days of conveyance of the property to the Developer or December 31, 2021. If the agreement is terminated, the remaining monies shall be returned to the Funding Parties on a pro rata basis. Should the agreement be terminated, the provisions of the Grant Agreement between the City of Springfield and MGM would then come into play, whereby up to \$11,000,000 would be payable to the City for the establishment of a Market Rate Housing Fund for the costs associated with developing an alternative housing project within ½ mile radius of the Elm Street project.

In a matter related to the 31 Elm Street property, MGM purchased 195 State Street from the City of Springfield in 2016 with the intention of redeveloping the property into approximately 30 of the required 54 market rate housing units. Once the deal is complete with respect to the 31 Elm Street redevelopment, MGM will return 195 State Street to the City of Springfield at no cost for potential future development of the property by the City of Springfield.

Recommendation

We recommend that the Commission eliminate the reference to the construction of the 54 units of residential housing from the construction timeline as approved by the Commission on April 12, 2018, and that MGM's payment of \$16 million to MassHousing by January 8, 2021 in accordance with the schedule outlined in the Cooperative Agreement satisfies the housing commitment established in the RFA-2 and Gaming license. Any changes to the dates in the Cooperative Agreement, should they occur, should be further reviewed and approved by the Commission. We further recommend that if the required payments are not made by MGM to MassHousing, then MGM will be required to construct the 54 market rate housing units as envisioned in the RFA-2 and the third amendment to the Host Community Agreement.

Construction Bond. Because MGM Springfield was not able to complete the construction of the residential units by the time of its opening (and the construction of the then so-called Dave's Retail building), the Commission determined that MGM Springfield would be required to continue to maintain a deposit bond until December 31, 2020 providing security for these obligations. MGM Springfield was authorized to reduce the amount of the original bond it posted to provide security, pursuant to MGL c. 23K, sec. 10, for the construction of the overall MGM Springfield facility.⁴ On July 19, 2018, the Commission authorized MGM Springfield to lower the amount of its then current bond from \$51,579,200 to \$25,000,000 and add a rider to

⁴ MGL c. 23K sec. 10 and 205 CMR 122.05 provide that within 30 days of the award of a gaming license, the applicant shall either deposit 10% of the total investment proposed in the applicant's RFA 2 application into an interest bearing account or secure a deposit bond in the amount of 10% of the proposed capital investment. If the applicant secures a bond, the bond shall forfeit to the Commonwealth if the applicant is unable to complete the gaming establishment. Chapter 23K sec. 10 provides that the monies in escrow or a bond shall be held by the Commission until the final stage of construction at which time the escrow or the bond shall be released to the applicant.

the current bond describing it as security for the completion of construction of the residential units as approved by the Commission and the completion of construction of the Dave's Furniture retail location⁵. Now that MGM Springfield plans to make a contribution instead of constructing the residential units, the Commission should consider the status of the bond.

Recommendation

We recommend that the bond on the project be maintained through December 31, 2020 at which point it will expire. There is an eight day gap between the expiration of the bond and the date of the final MGM payment to MassHousing. Should MGM not make the final payment to MassHousing by January 8, 2021, we recommend that the Commission reinstate the housing condition and require the posting of a new bond.

RFA- 2 Provisions. MGL c. 23K, sec. 21 states that “[t]he licensee shall ...have an affirmative obligation to abide by every statement made in its application to the commission, including all evaluation criteria and eligibility requirements.” MGM Springfield’s RFA-2 included numerous references to the plan to develop 54 residential units and the requirements under the HCA. Section 3-30-01 of the RFA-2 established the commitment to provide 54 units of housing as part of the project. MGM Springfield is requesting that the provision of grant funding pursuant to the Grant Agreement will satisfy its residential obligations.

Recommendation

We recommend that the provisions established in the Fifth Amendment to the Host Community Agreement, the Grant Agreement Establishing the Downtown Springfield Market Rate Housing Fund and the Cooperative Agreement replace the housing provisions established in the RFA-2.

Amendment to Springfield’s HCA. The Commission’s regulation, 205 CMR 127.06: Voluntary Reopening of a Mitigation Agreement states that licensees and host communities may voluntarily reopen mitigation agreements provided that the ability to reopen such agreement is described in the HCA summary that was provided to the voters prior to the referendum on the HCA.⁶ The HCA summary states that “MGM and the City may amend the Agreement at any time by mutual written agreement. The Agreement may be amended to address any new rules, regulations or requirements adopted by the Massachusetts Gaming Commission or as may be necessary to comply with environmental permits and approvals. “

Recommendation

The Commission does not need to act with respect to the Fifth Amendment to the Springfield HCA

⁵ The bond as reconfigured no longer provided security for the construction of the gaming establishment.

⁶ This regulation states that “[i]n addition to the reasons stated in 205 CMR 127.02 the parties to a mitigation agreement may reopen the mitigation agreement for any reason stated in the mitigation agreement itself, provided that in the case of a host community agreement the option to reopen the agreement and the condition under which such agreement may be reopened has been described in the fair, concise summary referenced in M.G.L. c. 23K, § 15(13) and 205 CMR 124.05.”

Attachment A

EXHIBIT V

GRANT AGREEMENT ESTABLISHING THE DOWNTOWN SPRINGFIELD MARKET RATE HOUSING FUND

This Grant Agreement (this "Agreement") is dated as of _____, 2020, but is effective as of the Effective Date (as defined herein), and is entered into by and between the SPRINGFIELD REDEVELOPMENT AUTHORITY (the "SRA"), and BLUE TARP REDEVELOPMENT, LLC, a Massachusetts limited liability company (the "Grantor"). Each of the SRA and the Grantor is a "Party" to this Agreement and collectively may be referred to as the "Parties."

RECITALS

A. The SRA took ownership of the former Court Square Hotel property located at 13-31 Elm Street, along with the adjoining properties including but not limited to properties located at 3-7 Elm Street, 104-108 State Street, N/S State Street (#98) and N/S State Street (#100), Springfield, Massachusetts (collectively, such properties are the "Elm Street Project").

B. In 2006, Urban Land Institute ("ULI"), a 501(c)(3) nonprofit research and education organization whose members have expertise in the planning and development of vibrant, competitive metropolitan areas through sharing global best practices and promoting effective relationships among business, government, and community stakeholders, related to land use and real estate development, was commissioned by the City of Springfield (the "City") to convene a five-day Advisory Services Panel to address issues confronting the City and to provide recommendations concerning how the City can, among other things, capitalize on its assets, make the most of its community and economic development efforts, and prioritize its planning and development efforts. The recommendations of the ULI Advisory Services Panel are summarized in that certain Advisory Services Panel Report dated September 24-29, 2006 (the "ULI Report"). The ULI Report further suggests that the City focus its attention on redeveloping the area known as "Court Square" including the historic former Court Square Hotel, as the appearance of the buildings within Court Square are important to encourage pedestrian traffic.

C. The SRA, through broad urban renewal and real estate development powers afforded to it by Chapter 121B of the General Laws of Massachusetts, has established the City of Springfield's Court Square Urban Renewal Plan, and has undertaken urban renewal activities to support the proposed restoration of the Elm Street Project and, in light of the ULI Report, has undertaken efforts to revise the strategy for the redevelopment of this property that are intended to preserve its aesthetic and historic significance and also provide for a comprehensive strategy aimed at creating a unified, attractive, friendly and inviting environment within Springfield's downtown.

D. In July 2011, the SRA selected OPAL Real Estate Group ("Opal") to serve as the preferred developer for the Elm Street Project for the purpose of redeveloping the Elm Street Project site into a mixed use center that will bring new life into the core of downtown Springfield.

E. In January 2017, Opal entered into an agreement with Winn Development Company Limited Partnership to act as co-developers of the Elm Street Project (the "Elm Street Developers").

F. In June 2017, Opal assigned its preferred developer rights for the Elm Street Project to the Elm Street Developers which assignment was consent to by the SRA.

G. The Grantor and the City entered into that certain Host Community Agreement dated as of May 14, 2013, as to which MGM Springfield reDevelopment, LLC ("MGM Springfield", and collectively with Grantor, "MGM") became a party by joinder (as such Host Community Agreement has been amended and as may be further amended from time to time, the "Host Community Agreement").

H. Pursuant to the Host Community Agreement, MGM has developed within the City's downtown and in close proximity to the Elm Street Project a destination casino resort including a hotel, casino, restaurants, bars, and entertainment venues, as more fully described in the Host Community Agreement (the "**Project**").

I. Exhibit G to the Host Community Agreement obligates MGM to develop and construct at least 54 new, market rate higher end upscale urban apartment units within ½ mile of the boundaries of the Project site (the "**Housing Obligation**").

J. The City, the SRA, the Elm Street Developers, certain other funding parties and Grantor are parties to a certain Cooperative Agreement, dated _____, 2020, as the same may be amended from time to time (the "**Cooperative Agreement**") which sets forth the specific terms and conditions under which such parties will jointly utilize their respective financial resources and expertise to finance and facilitate the redevelopment of the Elm Street Project.

K. The Parties have agreed that the Elm Street Project would be a preferred alternative to the Housing Obligation.

L. The Cooperative Agreement requires that Grantor make a \$16 million contribution (the "**MGM Contribution**") to the Elm Street Developers to be used by the Elm Street Developers to fund a portion of the development of the Elm Street Project.

M. Grantor has agreed to provide the MGM Contribution in lieu of the Housing Obligation, which will require MGM and the City to amend the Host Community Agreement in a manner satisfactory to each of them (the "**Fifth Amendment**").

N. The Cooperative Agreement specifies certain situations in which Grantor may not be required to fund the MGM Contribution, may receive a return of any unfunded portion of the MGM Contribution and/or receive payments of principal and interest on the MGM Contribution. Grantor has agreed to use any such amounts, up to \$11 million plus interest received thereon, to fund a grant to the SRA as specified below.

NOW, THEREFORE, in consideration of the foregoing Recitals and the terms and conditions of this Agreement, the parties, intending to be legally bound, hereby agree as follows:

1. **Incorporation of Recitals.** The Recitals set forth above are incorporated herein by reference.

2. **Grant Amount; Payment Schedule.** The Grantor hereby agrees to make an unconditional grant (the "**Grant**") to the SRA in an aggregate amount equal to the sum of the following: (a) any portion of the MGM Contribution which Grantor does not fund pursuant to the Cooperative Agreement by _____, 2020 (the "**Unfunded MGM Contribution Proceeds**"), as such date may be extended from time to time by the Mayor of the City in his sole discretion (the "**MGM Contribution Due Date**"); and (b) (i) any portion of the MGM Contribution which Grantor does fund pursuant to the Cooperative Agreement which is returned to Grantor; plus (ii) any payments of principal and/or interest on the MGM Contribution which Grantor receives ((b) (i) and (ii), the "**Returned MGM Contribution Proceeds**"), provided however that in no event shall the sum of the Unfunded MGM Contribution Proceeds plus the Returned MGM Contribution Proceeds exceed \$11 million in the aggregate, plus the amount of any interest received by Grantor on the \$11 million portion of the MGM Contribution. Grantor hereby assigns to the SRA any Returned MGM Contribution Proceeds in an amount not to exceed \$11 million, plus the amount of any interest received by Grantor on the \$11 million portion of the MGM Contribution. Payment of the Unfunded MGM Contribution Proceeds, if any, shall be due and payable

within ten (10) days of the MGM Contribution Due Date and payment of the Returned MGM Contribution Proceeds, if any, shall be due and payable within ten (10) days of receipt of the Returned MGM Contribution Proceeds (the "Returned Proceeds Due Date", and together with the MGM Contribution Due Date, the "Due Date") and shall bear interest at the Default Rate from the Due Date until paid. For purposes of this Agreement, the term "Default Rate" shall mean a rate of interest at all times equal to the greater of: (i) the rate of interest announced from time to time by Bank of America, N.A. ("B of A"), or its successors, as its prime, reference or corporate base rate of interest, or if B of A is no longer in business or no longer publishes a prime, reference or corporate base rate of interest, then the prime, reference or corporate base rate of interest announced from time to time by such local bank having from time to time the largest capital surplus, plus four percent (4%) per annum or (ii) twelve percent (12%) per annum, *provided, however*, the Default Rate shall not exceed the maximum rate allowed by applicable law.

3. Use of Grant Funds. The SRA shall use the funds of the Grant (the "Grant Funds") to establish the "Downtown Springfield Market Rate Housing Fund" solely for the purpose of paying a portion of the costs associated with the acquisition of property for, and the design, development and construction of, an alternate project (the "Alternate Project") at a site that is located both within a one-half (1/2) mile radius of the Elm Street Project site (the "Alternate Site") and within the Court Square Urban Renewal Project Area Boundary, as established pursuant to the Court Square Urban Renewal Plan, as the same may be further amended. The Alternate Project will include no fewer than approximately 54 newly developed higher end upscale urban apartment units and may include retail and office space. The selection of such Alternate Site and development of the Alternate Project shall not delay or otherwise affect the Grantor's obligations to pay the Grant as provided herein.

4. No Obligation to Refund Grant Funds. Once Grant Funds are paid to the SRA, such funds shall be available to the SRA for the uses specified herein and shall be non-refundable to Grantor unless required by the Massachusetts Gaming Commission.

5. Recordkeeping. The SRA shall maintain records of receipts and expenditures made from the Grant Funds provided in connection with this Agreement in accordance with its customary procedures. The Grantor shall have the right, upon reasonable advance written notice, to review the SRA's records relating to the expenditure of such Grant Funds.

6. Use of Marks. This Agreement does not give any Party any rights of ownership or license to use the other Party's trade name, trademark, service name, service mark, or logo (collectively, "Marks") other than as expressly authorized in writing by the holder of the Mark. The SRA will obtain the Grantor's prior written consent (not to be unreasonably withheld or conditioned) to any official publication, presentation, public announcement, or press release that refers to the Grantor's funding of the Grant.

7. Risk Management Matters.

(a) No Partnership, Joint Venture or Agency. Neither the Grantor nor its employees, agents or representatives are agents, independent contractors or employees of the SRA. Nothing in this Agreement shall create or be construed to create a partnership, joint venture or agency relationship between the SRA and the Grantor and neither Party shall have the authority to bind the other in any respect.

(b) Responsibility for the Alternate Project. The Parties agree and acknowledge that the Grantor's sole involvement in the Alternate Project is to make the Grant as required by this Agreement and that the Grantor has no obligation to: (i) participate in the hiring, vetting, training or supervision of any contractors, developers, sub-contractors or other parties engaged in the design,

development, construction or operation of the Alternate Project or Alternate Project Site; (ii) operate or control the Alternate Project or Alternate Project Site in anyway; and (iii) assume any liability or responsibility for the Alternate Project or Alternate Project Site.

(c) **Indemnification.** The SRA shall defend, indemnify and hold harmless MGM and each of its officers, agents, employees, contractors, subcontractors, attorneys and consultants (collectively the "**Indemnitees**" and individually an "**Indemnitee**") from and against any and all liabilities, losses, damages, costs, expenses, claims, obligations, penalties and causes of action (including reasonable fees and expenses for attorneys, paralegals, expert witnesses, environmental consultants and other consultants at the prevailing market rate for such services) whether based upon negligence, strict liability, statutory liability, absolute liability, product liability, common law, misrepresentation, contract, implied or express warranty or any other principle of law, and whether or not arising from third party claims, that are imposed upon, incurred by or asserted against Indemnitees or which Indemnitees may suffer or be required to pay and which arise out of or relate in any manner to the use of the Grant with respect to the Elm Street Project or the Alternate Project or Alternate Project Site. In case any action or proceeding shall be brought against any Indemnitee based upon any claim in respect of which the SRA has agreed to indemnify any Indemnitee, the SRA will, upon notice from Indemnitee, defend such action or proceeding on behalf of any Indemnitee at the SRA's sole cost and expense and will keep Indemnitee fully informed of all developments and proceedings in connection therewith and will furnish Indemnitee with copies of all papers served or filed therein, irrespective of by whom served or filed. The SRA shall defend such action with legal counsel it selects provided that such legal counsel is reasonably satisfactory to Indemnitee. Such legal counsel shall not be deemed reasonably satisfactory to Indemnitee if legal counsel has: (i) a legally cognizable conflict of interest with respect to MGM; (ii) within the five (5) years immediately preceding such selection performed legal work for MGM which in MGM's reasonable judgment was inadequate; or (iii) frequently represented parties opposing MGM in prior litigation. Each Indemnitee shall have the right, but not the obligation, at its own cost, to be represented in any such action by legal counsel of its own choosing.

(d) **Survival.** The terms and conditions of this Section 7 shall survive termination of this Agreement.

8. **Effective Date; Term.** This Agreement shall become effective on the date on which the following conditions have been satisfied: (i) this Agreement has been signed by all Parties; (ii) the Acknowledgment and Consent set forth on the signature page hereto has been signed by MGM Resorts International and (iii) the Massachusetts Gaming Commission notifies the City and Grantor that the Fifth Amendment satisfies the Grantor's housing obligation under its Category 1 license. The date on which this Agreement becomes effective shall be the "**Effective Date.**"

9. **Termination.** This Agreement may be terminated by MGM if within sixty (60) days of the execution of the Cooperative Agreement by all parties thereto, the Fifth Amendment is not signed by all parties thereto and approved by the City Council and the Massachusetts Gaming Commission notifies the Grantor and the City that the Fifth Amendment does not satisfy the Grantor's housing obligation under its Category 1 license.

10. **Miscellaneous.**

(a) **Notices.** Any notice, demand or other communication which any Party may desire or may be required to give to any other Party shall be in writing delivered by (i) hand-delivery, (ii) a nationally recognized overnight courier, or (iii) U.S. mail (but excluding electronic mail, i.e., "e-mail") addressed to a Party at its address set forth below, or to such other address as the Party to receive such notice may have designated to all other Parties by notice in accordance herewith:

If to the SRA:

Chief Development Officer
Springfield Redevelopment Authority
70 Tapley Street
Springfield, Massachusetts 01104

With copies to:

City Solicitor
City of Springfield
36 Court Street
Springfield, Massachusetts 01103

If to the Grantor:

President & COO
Blue Tarp reDevelopment, LLC dba MGM Springfield
One MGM Way
Springfield, MA 01144

With copies to:

General Counsel
Blue Tarp reDevelopment, LLC dba MGM Springfield
One MGM Way
Springfield, MA 01144

And

Corporate Legal
MGM Resorts International
3950 S Las Vegas Blvd
Las Vegas, NV 89109

And

Fitzgerald Attorneys at Law, P.C.
46 Center Square
East Longmeadow, MA 01028

Any such notice, demand or communication shall be deemed delivered and effective upon actual delivery.

(b) *Applicable Law and Construction.* The laws of the Commonwealth of Massachusetts shall govern the validity, performance and enforcement of this Agreement. This Agreement has been negotiated by the SRA and the Grantor, and this Agreement, including the exhibits and schedules attached hereto, shall not be deemed to have been negotiated and prepared by the SRA and the Grantor, but by each of them.

(c) *Submission to Jurisdiction; Service of Process.* The Parties expressly agree that the sole and exclusive place, status and forum of this Agreement shall be the City, Hampden County, Massachusetts. All actions and legal proceedings which in any way relate to this Agreement shall be solely and exclusively brought, heard, conducted, prosecuted, tried and determined within the City, Hampden County, Massachusetts. It is the express intention of the Parties that the exclusive venue of all legal actions and procedures of any nature whatsoever which relate in any way to this Agreement shall be either the Superior Court Department of the Trial Court of the Commonwealth of Massachusetts sitting in the Hampden County Hall of Justice in the City, or the United States District Court sitting in the City.

(d) *Complete Agreement.* This Agreement, and all the documents and agreements described or referred to herein, including the exhibits and schedules attached hereto, constitute the full and complete agreement between the Parties with respect to the Grant, and supersedes and controls in its entirety over any and all prior agreements, understandings, representations and statements whether written or oral by each of the Parties, provided however that any failure of Grantor to pay the Grant Funds as

provided in this Agreement shall be deemed a default under the terms and provisions of the Host Community Agreement entitling the City to exercise its remedies as provided thereunder.

(e) *Exhibits.* Each exhibit referred to and attached to this Agreement is an essential part of this Agreement.

(f) *Captions.* The captions of this Agreement are for convenience of reference only and in no way define, limit or describe the scope or intent of this Agreement or in any way affect this Agreement.

(g) *Amendments.* This Agreement may not be modified or amended except by a written instrument signed by all Parties.

(h) *No Third Party Beneficiaries.* There shall be no third party beneficiaries with respect to this Agreement.

(i) *Counterparts.* This Agreement may be executed in counterparts, each of which shall be deemed to be an original document and together shall constitute one instrument.

(j) *Assignment of Agreement.* Neither Party may assign this Agreement or any of its rights and obligations hereunder without the prior written consent of the other Party.

(k) *Savings Clause.* If this Agreement contains any unlawful provisions not an essential part of this Agreement and which shall not appear to have a controlling or material inducement to the making thereof, such provisions shall be deemed of no effect and shall be deemed stricken from this Agreement without affecting the binding force of the remainder. If any provision of this Agreement is capable of more than one interpretation, one which would render the provision invalid and one which would render the provision valid, the provision shall be interpreted so as to render it valid.

(l) In the performance of this Agreement, the Grantor will not discriminate against any person because of race, color, religion, sex, sexual orientation, disability, family status or national origin. To the extent application, the Grantor will take affirmative action to ensure that all persons to whom services are provided under the Agreement are treated without regard to their race, color, religion, sex, sexual orientation, disability, family status or national origin.

(m) The Grantor covenants that it has no interest, nor shall it acquire any interest, directly or indirectly, which would conflict in any manner or degree with the performance of its obligations under this Agreement. No member, officer or employee of the SRA, or its designees or agents, no member of the governing body of the SRA, and no other public official of the SRA who exercises any functions or responsibilities with respect to the performance of this Agreement, during his or her tenure, shall have any interest, direct or indirect, in this contract, or proceeds thereof, for the work to be performed under this Agreement in violation of the provisions of Chapter 268A of the General Laws.

(n) To the extent applicable, the Grantor agrees to comply with the provisions of Mass. Gen. Laws ch. 268A, as amended by Chapter 20 of the Acts of 2009 ("Act"), which took effect on September 29, 2009.

(o) The Grantor certifies under penalties of perjury that this Agreement has been entered into in good faith and without collusion or fraud with any other person. As used herein this subsection, the word "person" shall mean any natural person, governmental, business, partnership, corporation, union, committee, club, or other organization, entity, or group of individuals.

IN WITNESS WHEREOF, the SRA and the Grantor have executed and delivered this Agreement on the date set forth below each Party's signature.

**SPRINGFIELD REDEVELOPMENT
AUTHORITY**

BLUE TARP REDEVELOPMENT, LLC

By: _____
Printed Name: _____
Title: Chair _____
Dated: _____

By: _____
Printed Name: _____
Title: President & COO _____
Dated: _____

Attachment B

Execution Version

EXHIBIT #1

FIFTH AMENDMENT TO THE HOST COMMUNITY AGREEMENT BY AND AMONG THE CITY OF SPRINGFIELD, MASSACHUSETTS, BLUE TARP REDEVELOPMENT, LLC AND MGM SPRINGFIELD REDEVELOPMENT, LLC

This Amendment dated _____, 2020 is made to the Host Community Agreement By and Between City of Springfield, Massachusetts (the "City"), Blue Tarp reDevelopment, LLC ("Blue Tarp") and MGM Springfield reDevelopment, LLC ("MGM Springfield, and collectively with Blue Tarp, "MGM) as of May 14, 2013 as amended (collectively, the "Agreement"). The City, Blue Tarp and MGM Springfield are collectively referred to as the "Parties". Terms not defined herein shall have the meanings ascribed to them in the Agreement.

WHEREAS, pursuant to Exhibit G of the Agreement, MGM is obligated to develop and construct the Project in compliance with the Project Description which requires, among other obligations, the obligation of MGM to develop at least 54 new, market rate higher end upscale urban apartment units within ½ mile of the boundaries of the Project Site (the "Housing Obligation");

WHEREAS, in addition to the Housing Obligation, pursuant to a certain Memorandum of Understanding and Settlement Agreement for 195 State Street, Springfield, Massachusetts (the "195 State Street Property"), dated March 28, 2016, by and among the City, MGM Springfield LLC and 195 State Street Real Estate LLC, the City has the right to take title to the 195 State Street Property;

WHEREAS, the City, the Springfield Redevelopment Authority, Blue Tarp and 31 Elm LLC, a Massachusetts limited liability company (the "Elm Street Developer") and certain funding parties to the Cooperative Funding Agreement, dated _____, 2020, as the same may be amended from time to time (the "Cooperative Agreement") which sets forth the specific terms and conditions under which such parties will jointly utilize their respective financial resources and expertise to finance and facilitate the redevelopment of the properties located at 3-7 Elm Street and 13-31 Elm Street (collectively, the "Elm Street Project);

WHEREAS, it is anticipated that upon completion the Elm Street Project will include 59 market rate upscale apartment units, 15 workforce apartments and approximately 12,000 square feet of first floor retail and restaurant space;

WHEREAS, it is expected that the redevelopment of the Elm Street Project by the Elm Street Developer will be conducted in a manner to preserve the historic and aesthetic elements of the property and create an attractive, friendly and inviting environment within the City's Downtown;

WHEREAS, the Parties acknowledge that the Elm Street Project should generate increased Project revenues due to the activity generated by the residential and retail components of the Elm Street Project and the increased attractiveness of the Court Square area;

WHEREAS, the Parties agree that the Elm Street Project would be a preferred

alternative to the current residential obligation of MGM as required under the Agreement;

WHEREAS, to provide a portion of the substantial funding necessary to complete the Elm Street Project, the City requested that Blue Tarp enter into the Cooperative Agreement which requires that Blue Tarp contribute \$16 million (the "MGM Contribution") to the Elm Street Developer to be used along with other funding sources to fund the development of the Elm Street Project;

WHEREAS, Blue Tarp has agreed to fund the MGM Contribution in lieu of the Housing Obligation;

WHEREAS, the MGM Contribution, when fully funded, will satisfy the Housing Obligation; and

WHEREAS, the Parties agree that due to the potential for increased revenue to the Downtown area resulting from the Elm Street Project, upon the funding of the MGM Contribution a CPI adjustment should be applied to certain payments required by the Developer under the Agreement.

NOW THEREFORE, for good and valuable consideration and subject to Section (4) below, the Agreement is hereby amended as follows:

(1) By deleting Paragraph 3 of Exhibit A in its entirety and replacing it with the following:

For each Casino Year during the Term: (a) One-Eighth of One Percent (0.125%) of Developer's daily Gross Revenue until Developer's aggregate Gross Revenue for such Casino Year equals Four Hundred Million Dollars (\$400,000,000), adjusted annually on each July 1 during the Term by the CPI Adjustment Factor, and (b) One Percent (1%) of Developer's daily Gross Revenue in excess of Four Hundred Million Dollars (\$400,000,000), adjusted annually on each July 1 during the Term by the CPI Adjustment Factor (collectively, the "**Community Impact Percentage Payment**"), to be remitted quarterly by the 15th of the following month after the quarter ends by Developer to the City, consistent with the procedures set forth in Section 55 of the Act, by electronic wire transfer of funds to such account or accounts as directed by the City, commencing on the Operations Commencement Date or according to such other procedure as may from time to time be established by the City Treasurer/Collector and Developer. Notwithstanding the foregoing, the Community Impact Percentage Payment shall only be adjusted by the CPI Adjustment Factor commencing on the date that the Blue Tarp funds the MGM Contribution as more fully described in paragraph 15 of Exhibit E.

(2) By deleting the Residential paragraph in Exhibit G in its entirety and replacing it with a new paragraph in Exhibit E as follows:

"15. Residential Housing Obligations.

(a) No later than March 31, 2020, as such date may be extended by the Mayor in his sole discretion (the "**Execution Date**"), Blue Tarp shall enter into a certain cooperative agreement, as the same may be amended from time to time, by and among the City, Blue Tarp, 31 Elm LLC, the Springfield Redevelopment Authority, and certain other parties (the "**Cooperative Agreement**").

(b) Pursuant to the terms of the Cooperative Agreement, Blue Tarp shall contribute

Sixteen Million Dollars (\$16,000,000.00) (the “**MGM Contribution**”) to be used by 31 Elm LLC, a Massachusetts limited liability company, along with funds from other sources as set forth in the Cooperative Agreement, to fund the redevelopment of 3-7 Elm Street and 13-31 Elm Street, Springfield, Massachusetts which redevelopment will result in the construction of approximately 59 market rate, upscale apartment units, 15 workforce apartments and approximately 12,000 square feet of retail/restaurant space, subject to such other terms and conditions as are set forth in the Cooperative Agreement.

(c) On or before the Execution Date, Blue Tarp shall enter into a grant agreement with the Springfield Redevelopment Authority in substantially the same form as Exhibit V, providing for the establishment of a Downtown Springfield Market Rate Housing Fund (the “**Fund**”). In the event: (i) the Cooperative Agreement is not signed by all parties to the Cooperative Agreement by the Execution Date, Blue Tarp shall, upon ten (10) days written notice from the City, contribute Eleven Million Dollars (\$11,000,000) to the Fund; and (ii) Blue Tarp (x) does not fund at least Eleven Million Dollars (\$11,000,000) of the MGM Contribution in accordance with the terms of the Cooperative Agreement (the “**Shortfall**”); or (y) receives a return of all or any portion of the MGM Contribution, whether on account of the return of unused development funds under the terms of the Cooperative Agreement (the “**Unused Funds**”) or on account of payments of principal and/or interest on the MGM Contribution (the “**Repayment Amounts**”), Blue Tarp shall, within ten (10) days of receipt of such amounts, contribute any Shortfall, Unused Funds and/or Repayment Amounts to the Fund until the amounts contributed by Blue Tarp to the Fund equals Eleven Million Dollars (\$11,000,000), plus the amount of any interest received by Blue Tarp on the \$11 million portion of the MGM Contribution.

(3) By deleting Paragraph 4 of Exhibit U in its entirety and replacing it with the following:

In addition to the Fixed Payment, the 121A payments shall include an annual amount during each Casino Year equal to (a) One-Eighth of One Percent (0.125%) of Developer’s daily Gross Revenue until Developer’s aggregate Gross Revenue for such Casino Year equals Four Hundred Million Dollars (\$400,000,000), adjusted annually on each July 1 during the Term by the CPI Adjustment Factor, and (b) One Percent (1%) of Developer’s daily Gross Revenue in excess of Four Hundred Million Dollars (\$400,000,000), adjusted annually on each July 1 during the Term by the CPI Adjustment Factor (the “**Variable Payment**”), to be remitted quarterly by the 15th of the following month after the quarter ends by Developer to the City, consistent with the procedures set forth in Section 55 of the Act, by electronic wire transfer of funds to such account or accounts as directed by the City, commencing on the Operations Commencement Date or according to such other procedure as may from time to time be established by the City Treasurer/Collector and Developer. Notwithstanding the foregoing, the Variable Payment shall only be adjusted by the CPI Adjustment Factor commencing on the date that Blue Tarp funds the MGM Contribution.

(4) This Amendment shall not be effective unless and until the Commission notifies the City and MGM that Blue Tarp’s funding of the MGM Contribution pursuant to the Cooperative Agreement satisfies MGM’s housing obligation under its Category 1 license.

All other terms and provisions of the Agreement shall continue to have full force and affect.

[Signature Page Follows]
CITY OF SPRINGFIELD, MASSACHUSETTS,
a municipal corporation

Approved:

Chief Development Officer
Date Signed: _____

Approved as to appropriation:

City Comptroller
Date Signed: _____

Approved as to form:

Edward Pikula, City Solicitor
Date Signed: _____

Reviewed:

Chief Administrative and Financial Officer
Date Signed: _____

Approved:

Domenic J. Sarno, Mayor
Date Signed: _____

BLUE TARP reDEVELOPMENT, LLC, a
Massachusetts limited liability company,

_____, President and Chief Operating Officer
Dated Signed: _____

MGM SPRINGFIELD reDEVELOPMENT, LLC, a
Massachusetts limited liability company,

_____, Authorized Signatory
Dated Signed: _____

THE IMPLEMENTATION BLUEPRINT

An Economic Development Strategy for the Casino Impact Area

PHASE ONE IMPLEMENTATION STRATEGY

February 27, 2020

City of Springfield Office of Planning and Economic Development

THE IMPLEMENTATION BLUEPRINT

OVERVIEW

Premise: MGM – Springfield provides a very finite window for the leveraging of additional catalytic development in the downtown that strengthens Western Massachusetts as a regional destination for business, retail, entertainment and conventions.

The “Implementation Blueprint” provides a roadmap and strategies to realize the full economic development potential resulting from the casino development.

IMPLEMENTATION BLUEPRINT



*An Economic Development Strategy for
The Renaissance of a Great American Downtown:
Springfield, MA*

June 28, 2018

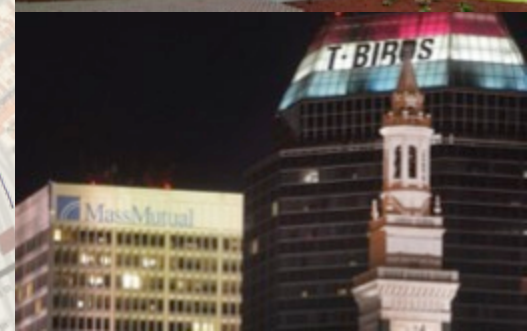
*Prepared in consultation with The City of Springfield, MA & MGM Resorts
by The Chicago Consultants Studio, LLC*

THE IMPLEMENTATION BLUEPRINT

OVERVIEW

The Blueprint recommends four areas to be pursued as immediate priorities:

- 1** *Identification of Key Strategic Development Opportunities*
- 2** *Solidifying Greater Springfield as the Region's Convention, Meeting & Entertainment Center*
- 3** *Creating a More Diverse Housing Market Downtown*
- 4** *Expand Existing Entrepreneurial Infrastructure to Attract New Downtown Employers and Businesses*



YEAR ONE ASSESSMENT

MGM Springfield has delivered a major investment creating new revenue for the State/City and bringing new markets and increased tourism to Springfield.

- **\$950M investment**, transforming over six city blocks in the heart of downtown
- **+10,000 visitors/day** to casino and downtown area
- **+\$22M/month** or \$78.8M to date in new gaming tax revenue
- **20% increase** in rooms & hotel tax
- Growing regional tourism economic impact up 40% (from 2013-2019)



YEAR ONE ASSESSMENT

MGM rightfully was the driver of the Casino District, the City now must provide the leadership for the area surrounding the casino.

Over one year since MGM's opening, it is critical that the City lead the next phase of redevelopment outside the casino district, and maximize the economic development impact, before the limited window of opportunity for such inclusive redevelopment runs out.

PHASE ONE: Challenges / Needs

Despite MGM impact, economic development around the casino district has been limited:

- MGM district is vibrant and active but its character/energy is not spilling out
- Prime adjacent real estate remains vacant and or distressed
- Initial strong development interest has weaned to speculative real estate holdings
- Perceived uncertainty in the market and numerous development constraints exist
- ***The City needs to galvanize, guide and facilitate targeted development and investment in the casino target area quickly.***



ACTION ONE: ECONOMIC OVERLAY STRATEGY

- Craft an ***“Economic Development Overlay Strategy”*** which includes:
 - 1. Development Framework for Casino Area***
 - 2. Zoning / Land Use Regulatory Controls and Guidelines***
 - 3. Incentives and Assistance***



THE FRAMEWORK:

A. Main Street Blocks

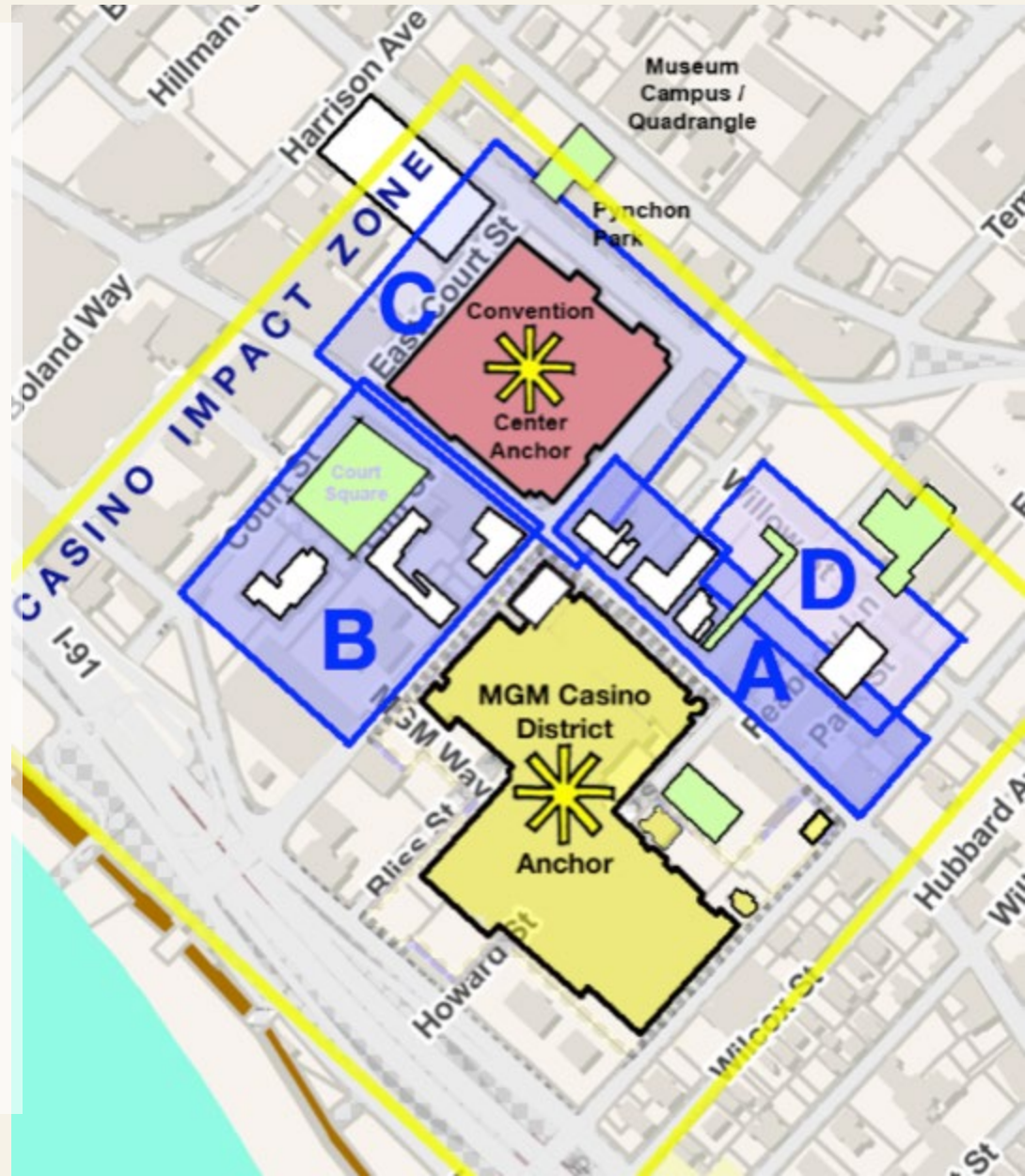
- Bankruptcy parcels
- Ground floor activation
- 101 State Street

B. Court Square Redevelopment

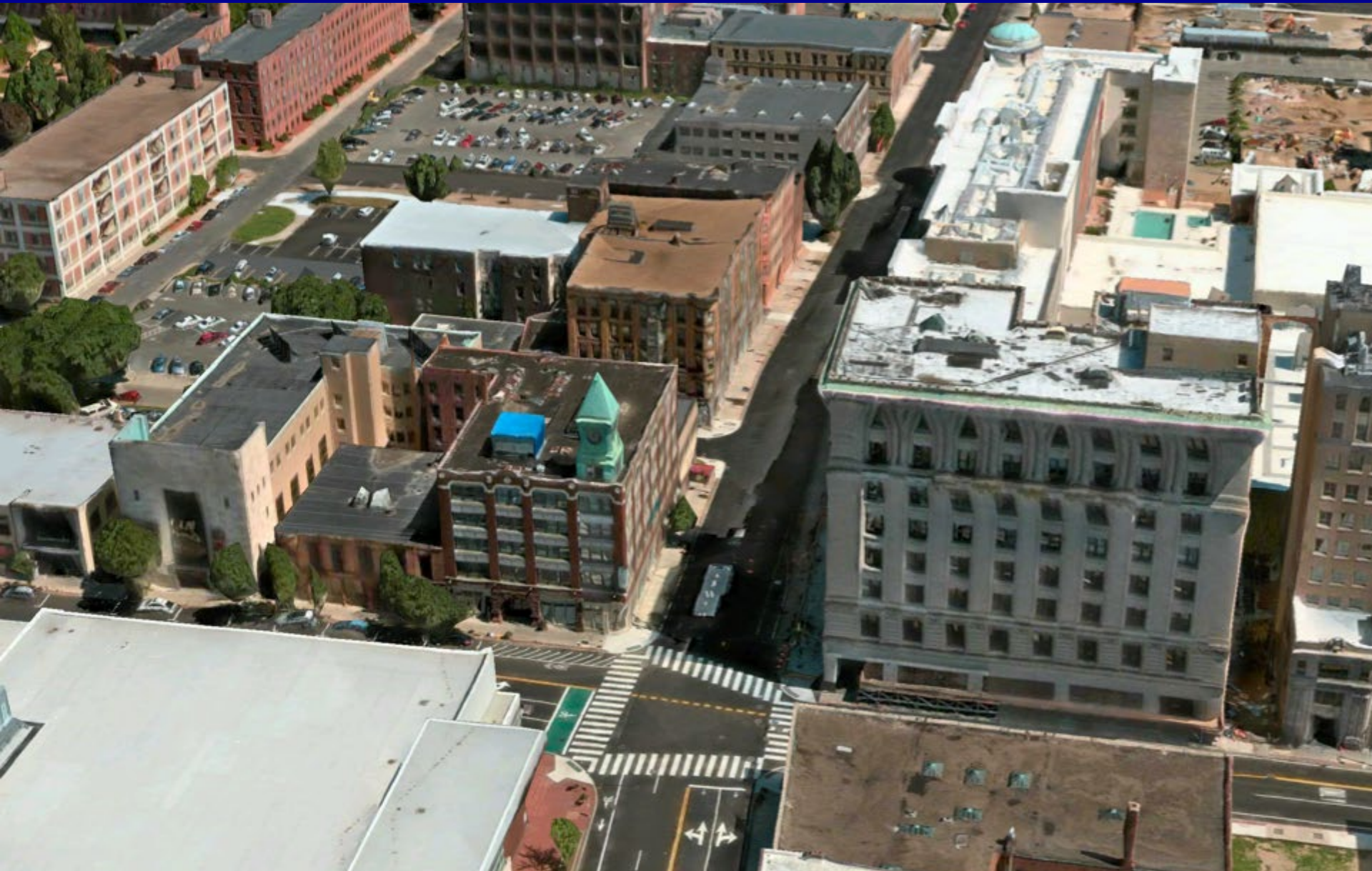
- 31 Elm St.
- Old First Church
- Shean Building

C. Mass Mutual Convention Complex

- Civic Center garage site
- Main St. blocks reuse
- Ground floor activation



THE IMPLEMENTATION BLUEPRINT



Main Street Blocks

Expanding the energy of the Casino District into Main Street

Show

KEY ISSUES / OPPORTUNITIES

Leveraging MGM energy/character to reactivate South Main Street Corridor

- City must guide “master redevelopment” on South Main Street corridor
 - Lead / facilitate negotiations on parcels; “tee up” options
 - Provide range of incentives and related assistance
 - Potential to guide development with targeted City redevelopment RFP(s)
- “Bankruptcy blocks” present important and timely opportunity
 - Unique assemblage of properties
 - Potential to work with bank on range of options to facilitate control and ultimate redevelopment
- Ground Floor Uses
 - Near term focus on reuse of ground floor retail/restaurant/activated uses
 - Later phase upper floor rehab/renovation
- Main & State Street as new entry to activated Main Street “experience”
 - 113 State & 101 State make for a new MGM at grade gateway to the Mass Mutual Center and the entertainment district
 - Potential upper floor of 113 State as break out/conference with at grade connection to Mass Mutual Center
 - Extend street programming to Main Street corridor to activate/energize large scale programmed events

THE IMPLEMENTATION BLUEPRINT



B Court Square Redevelopment
Creating Distinctive Mixed Use District in Heart of Downtown

KEY ISSUES / OPPORTUNITIES

Unique opportunity to create high quality, high-end mixed-use district in heart of downtown bridging core office downtown and entertainment district

- Properly packaged, City can help orchestrate a most unique development
- 31 Elm Street
 - Reestablish/reactivate Court Square, prove City's ability to implement critical redevelopment project, and jumpstart market rate residential
 - Ensure high quality development including ground floor retail/activation
- Shean Block/Building
 - Near term stabilization of facades and “carve-out” of interiors
 - Redevelopment potential with additional mixed-use potential beyond the base that provides synergies with 101 State and Mass Mutual Center
 - Urban renewal district could assist acquisition, if absolutely required
- Old First Church Reuse
 - Hidden gem and truly unique redevelopment potential
 - Creative mixed-use/reuse of a historic structure with an arts and cultural focus
- Restoration of perimeter streets for access, address and parking

THE IMPLEMENTATION BLUEPRINT



Mass Mutual Convention Complex

Making Springfield New England's Leading Convention & Conference Center



THE IMPLEMENTATION BLUEPRINT

KEY ISSUES / OPPORTUNITIES

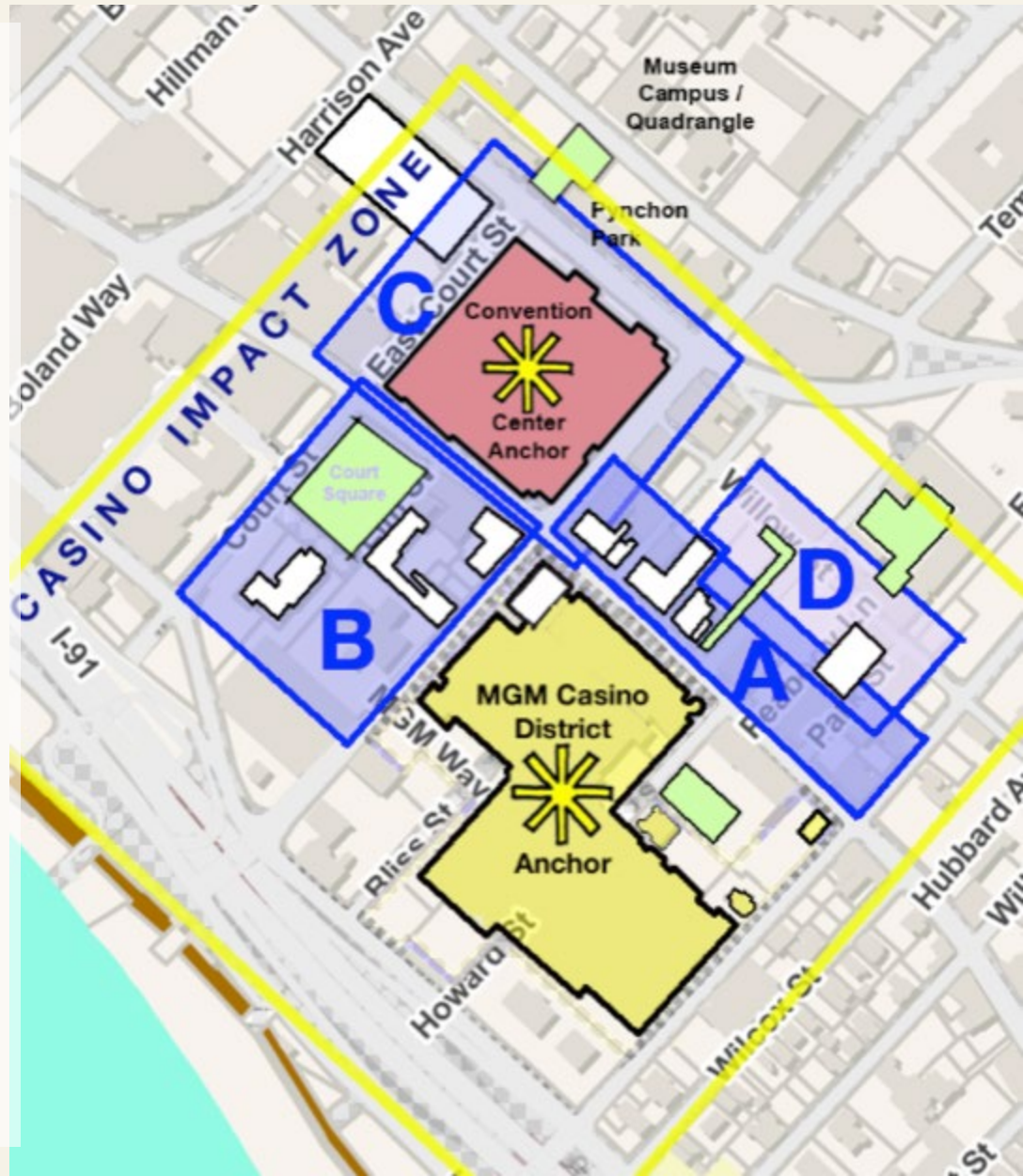
Leverage casino visitor traffic and exposure to make Greater Springfield THE premiere convention/conference/meeting center of western New England

- Greater Springfield needs to solve for complete package of convention offerings/facilities to compete and excel
 - Convention hotel
 - Broader range and variety of meeting and break-out space
 - Parking
 - Range of incentives
- Civic Center Garage Site
 - New garage is needed and additional uses should be considered on the site that strengthen the Mass Mutual Center and arena
 - “Bridge” connector over Court St. for essential linkages
 - Synergies with Pynchon Park and Museum Quadrangle
 - Entertainment uses need to be central to the Mass Mutual Center
- 113 State/101 State Street Sites
 - Ideal proximity and lynchpin between Mass Mutual Center and MGM
 - Conversion of upper floors at 113 State for break out/meeting space
 - Possible reuse of 101 State as boutique hotel
 - Potential linkages / connectivity at grade between both
- Better market MGM entertainment district offerings & Springfield amenities (much like Hartford)

THE FRAMEWORK: Phase One Implementation Initiatives

Work Being Advanced:

- Advancement of the Casino Impact Zone Development District and the individual four initiatives
- Exploration of constraints, issues and opportunities
- Assessing zoning controls and incentives impact, needs
- Implementation alternatives and strategies
- City, civic, business leadership engagement
- Final Development Framework Vision Plan To Be Issued in Spring



ZONING / LAND USE CONTROLS & GUIDELINES

- Establish a “Casino Impact Zone” Overlay District
 - Promote and ensure complementary, contextual development adjacent to MGM’s \$1B investment
 - Bring legitimacy, buy-in and weight of City/Council to district
 - Provide certainty and reality to development community
- Overlay to likely include:
 - Land use controls promoting compatible mixed-use development and complementary ground floor uses
 - Special use permits prior to any demolition
 - Special use permits to review certain uses
 - Development guidelines/parameters that promote/expand MGM district character and vitality, historic adaptive reuse and high quality development benchmarks
 - Fast track approval process for conforming projects and uses
 - Expanded signage to match Main Street casino district signage regulations
 - Sunset provisions to instill urgency and limit benefits timing
- OPED advancing controls, parameters/guidelines to bring to City Council for approval this spring

THE IMPLEMENTATION BLUEPRINT

An Economic Development Strategy for Casino Impact Area

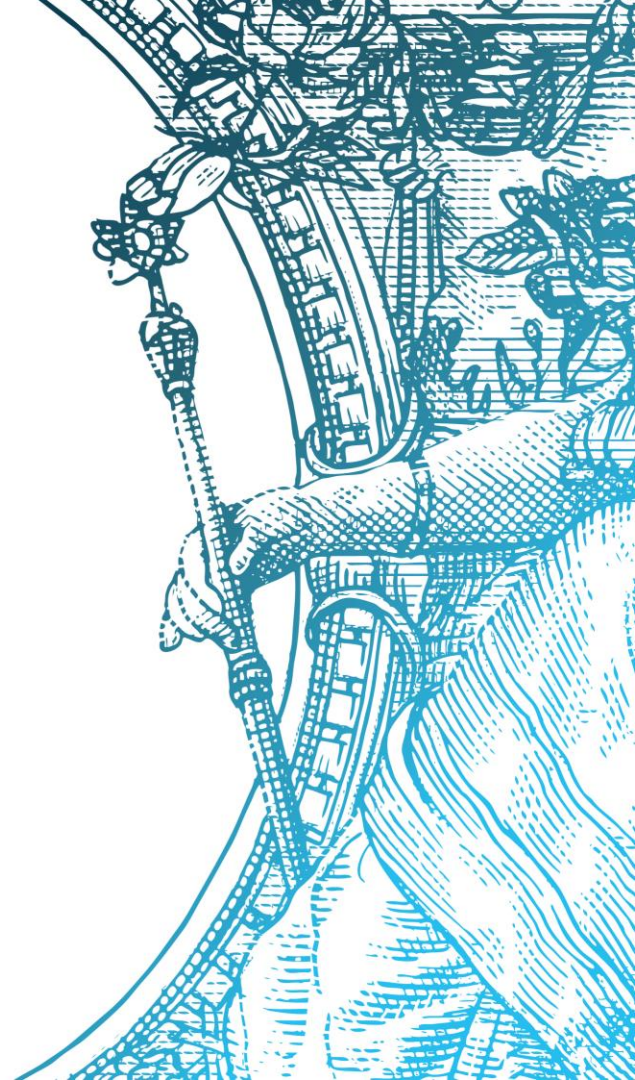


PHASE ONE IMPLEMENTATION STRATEGY

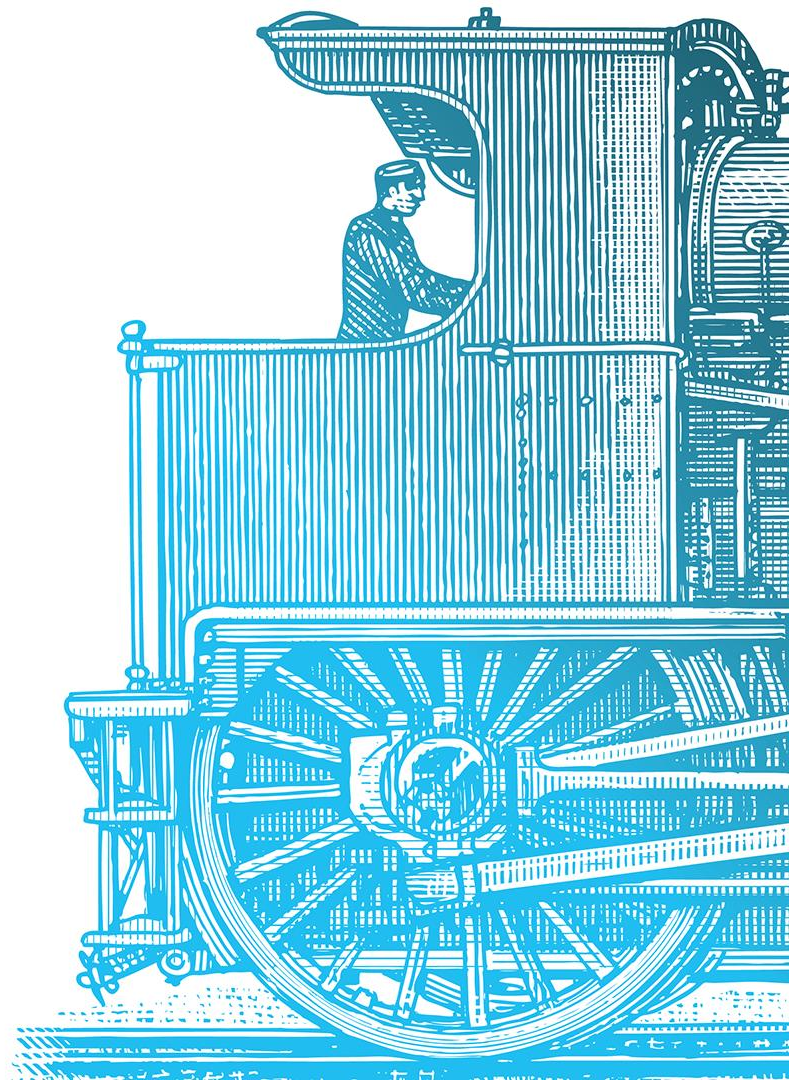
Q4 2019 Report

Massachusetts Gaming Commission

February 27, 2020



HIGHLIGHTS



Solar Canopy Reveal



- Developed in partnership with Distributed Solar Development (formerly GE Solar)
- Enable MGM Springfield's LEED Platinum Certification
- First for gaming industry
- Fully operational
- Generating more than 1,600 megawatt hours
- Reduces carbon footprint



New Traditions



REVENUE, TAXES, LOTTERY & COMPLIANCE



Q4 2019 Gaming Revenue & Taxes

Month	Gaming Revenue	MA Taxes
October	\$21,193,386	\$5,298,347
November	\$19,936,451	\$4,984,113
December	\$18,953,212	\$4,738,303
TOTAL	\$60,083,049	\$15,020,763

**\$63.2M total MA taxes paid in 2019*

Lottery



Month	Lottery Sales at MGM Springfield
October	\$94,458
November	\$151,462
December	\$144,230

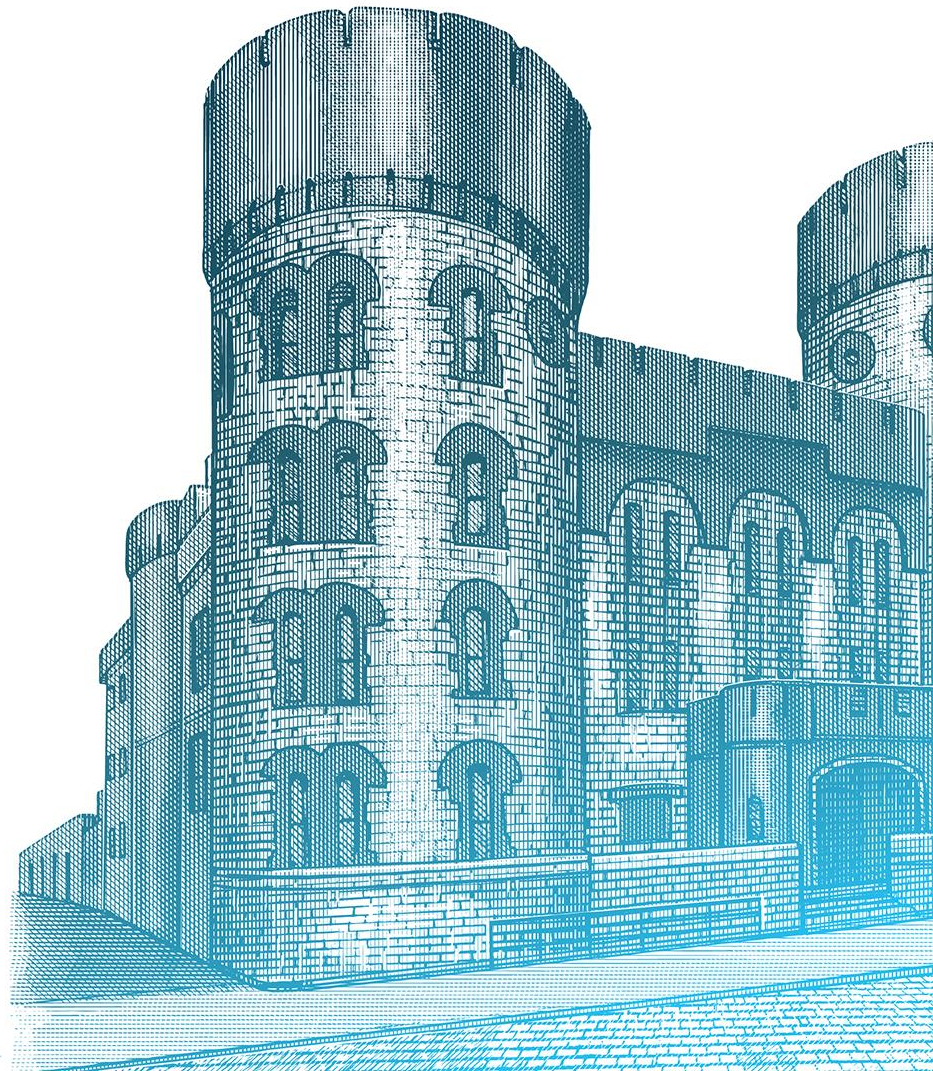


Compliance



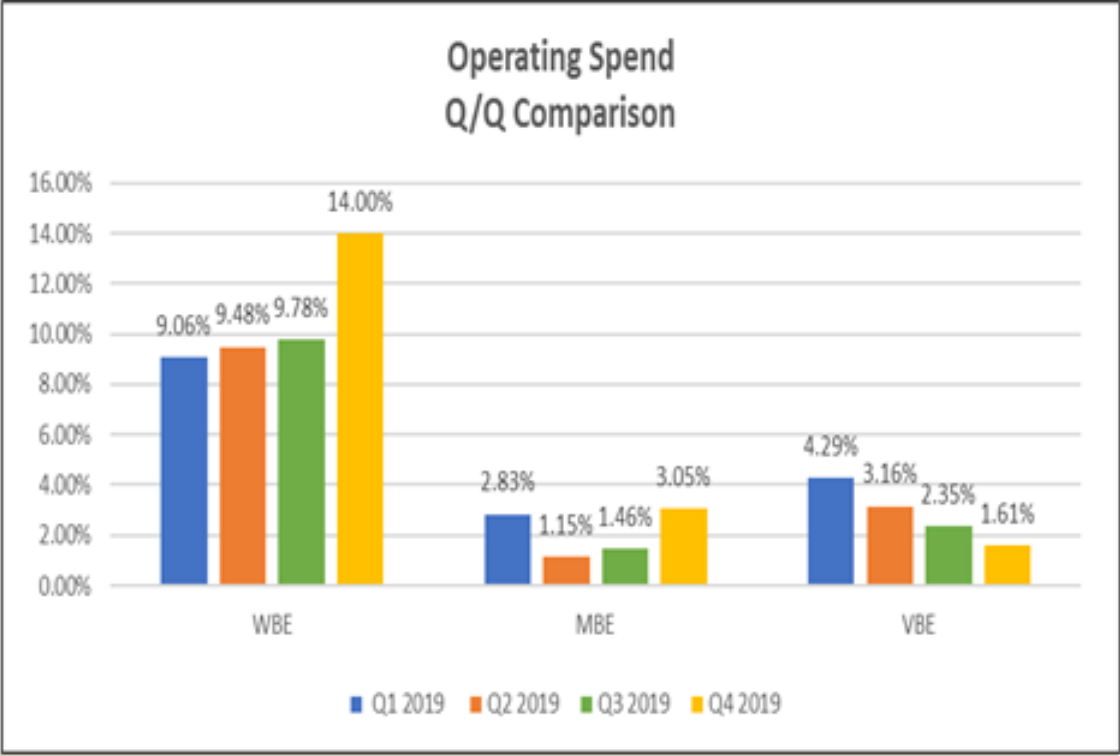
Month	Minors intercepted in Gaming Area and prevented from Gaming (% of visitation)	Minors intercepted gaming (% of visitation)	Minors intercepted consuming alcohol (% of visitation)
October	155(0.035%)	10(0.002%)	3(0.0007%)
November	156(0.033%)	11(0.002%)	1(0.0002%)
December	203(0.043%)	9(0.002%)	6(0.0012%)

SPEND UPDATE



Q4 2019 Operating Spend

Diversity Spend



Notes:

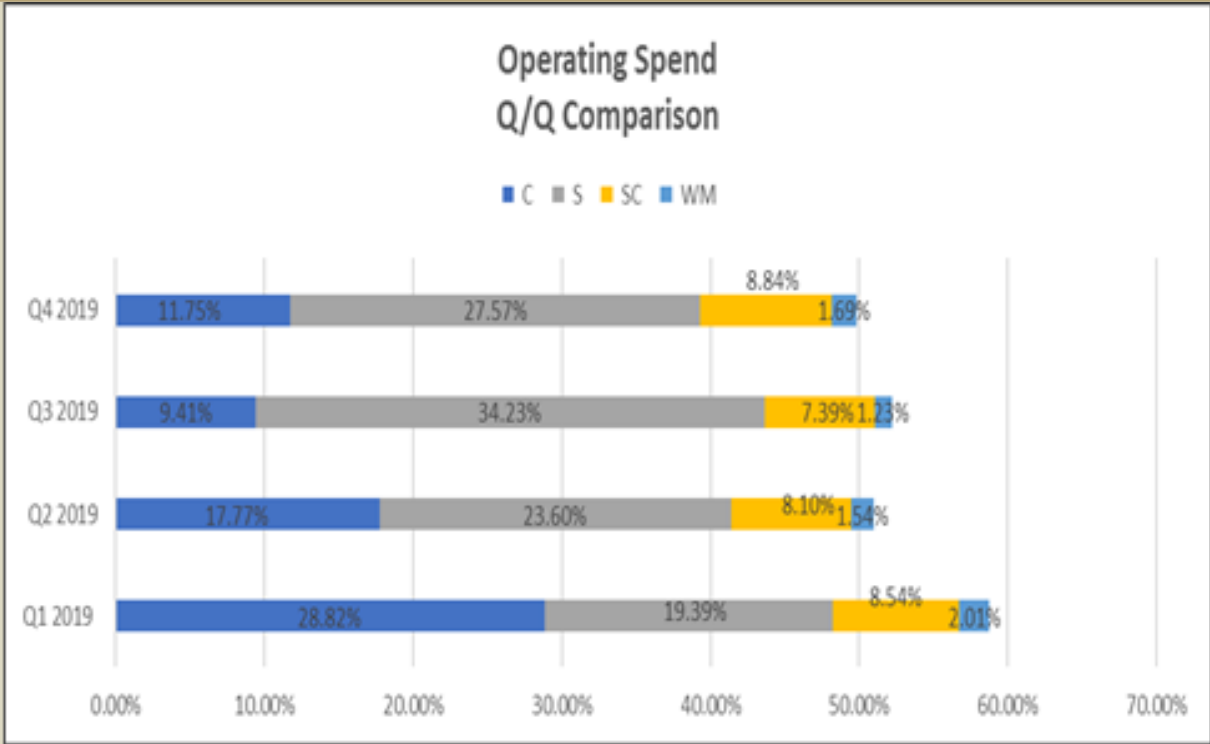
- Total Biddable Spend for Q4 2019 was 12.5M
- Diversity categories defined as:
 - WBE – Women-Owned Business Enterprise
 - MBE – Minority-Owned Business Enterprise
 - VBE – Veteran Owned Business Enterprise
- Diversity spend goals defined as:
 - WBE – 15% of Biddable Spend
 - MBE – 10% of Biddable Spend
 - VBE – 2% of Biddable Spend

\$12.5M identified as Biddable Spend
\$2.3M in payments to Diversity Suppliers (18.7%)



Q4 2019 Operating Spend

Local Spend



Notes:

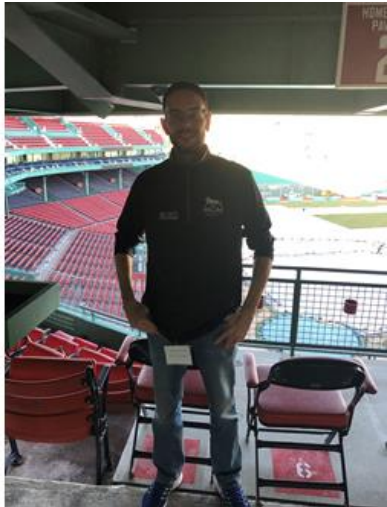
- Total Spend for Q4 2019 was 13.2M
- Spend segments defined as:
Commonwealth (C)
Springfield (S)
Surrounding Communities (SC)
Western Massachusetts (WM)

\$6.6M in payments to Mass. Suppliers (49.9%)
\$5.0M in payments to Western Mass. Suppliers (38.1%)



Vendor Outreach

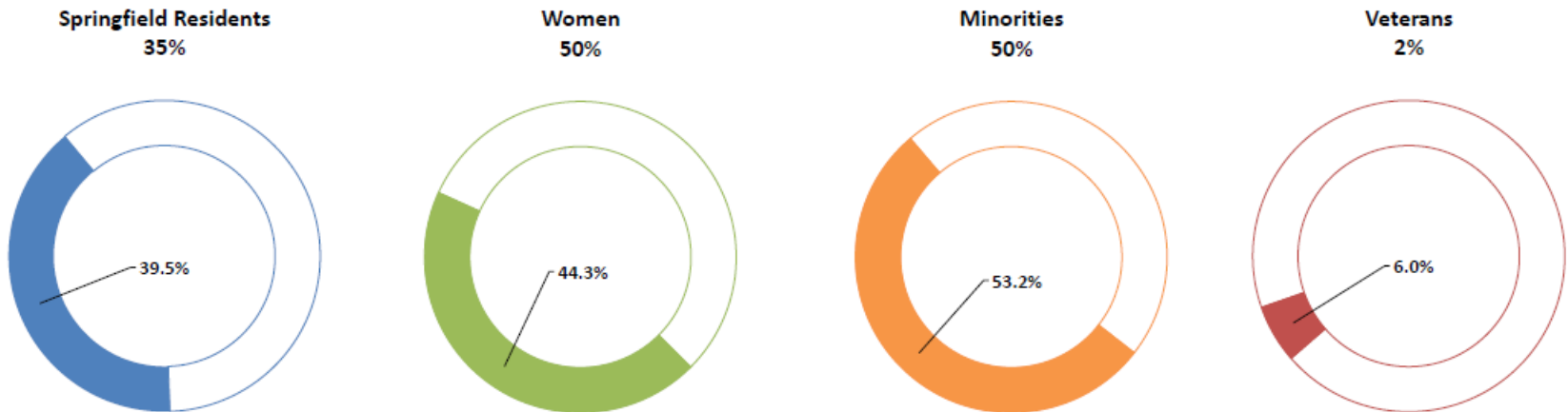
Date	Event	Location
10/08/2019	PFG Food Show	Springfield, MA
11/26/2019	GNEMSDC Fenway Event	Boston, MA



EMPLOYMENT



Progress on Hiring Goals



Represents 2,004 active employees as of 12/31/2019 (Does not include Campus, Tenants, Vendors)

Employment Numbers

	Employees	Full-Time	Part-Time
Totals	2,004	1,479	525
% of Total	100%	73.8%	26.2%

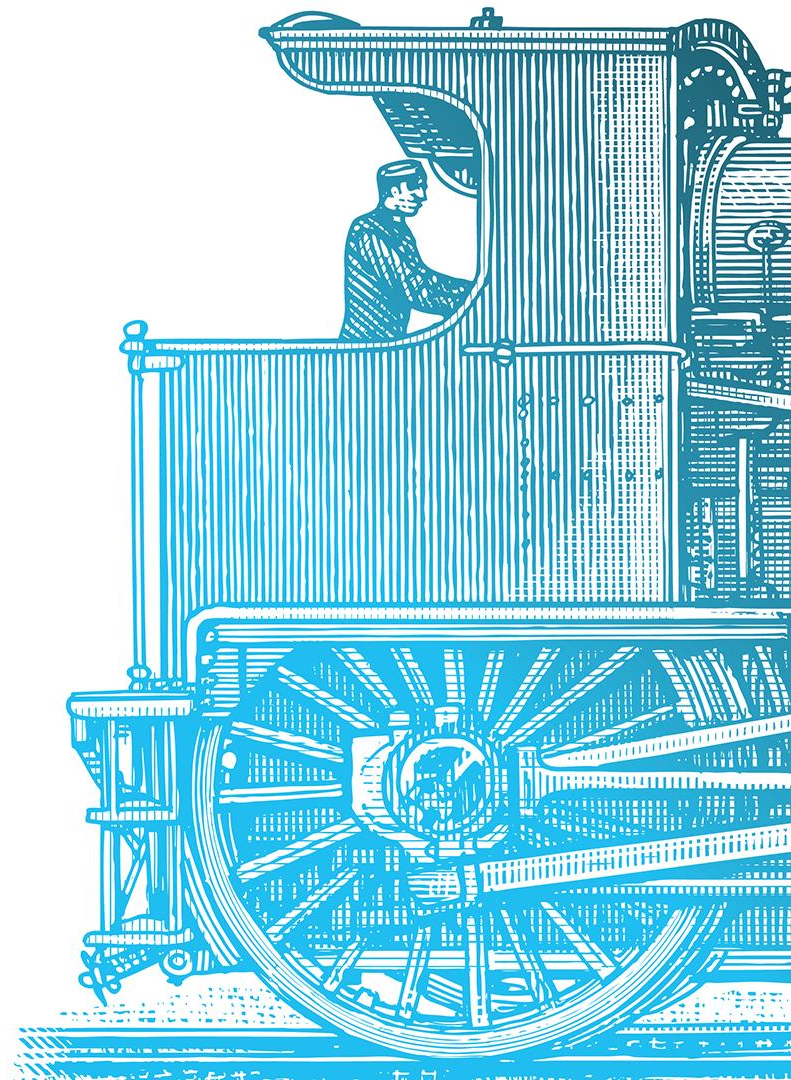
2019	Goals	Q1 %	Q1 #	Q2 %	Q2 #	Q3 %	Q3 #	Q4 %	Q4 #
MINORITY	50%	54.6%	1,258	53.6%	1,100	54.2%	1,106	53.2%	1,067
VETERAN	2%	6.1%	141	6.0%	124	6.1%	124	6.0%	121
WOMEN	50%	44.3%	1,021	44.5%	914	44.5%	907	44.4%	889
SPRINGFIELD	35%	39.3%	906	40.9%	841	40.0%	817	39.5%	791
WESTERN MA RESIDENTS		73.3%	1,687	76.1%	1,564	76.1%	1,553	76.3%	1,529
MA RESIDENTS		75.3%	1,734	77.8%	1,599	77.8%	1,589	78.1%	1,565
TOTAL # OF MGM EMPLOYEES			2,303		2,054		2,040		2,004
TOTAL # OF EMPLOYEES OF VENDORS			81		80		108		98
TOTAL # OF EMPLOYEES @GAMING ESTABLISHMENT			2,384		2,134		2,148		2,102

2019 Q4 Recruitment Efforts

- *Student Tours:* Smith College, Smith Vocational HS, HCC hospitality class, Univ. of New Haven
- *Initiatives:*
 - Westfield Technical Academy (co-op launch & donation)
 - Hampden County Sheriffs Dept Career Readiness Presentation
 - MassHire Career Fair
 - UMASS HTM career fair
 - Westfield State career fair
 - Veterans, Inc. career fair
- Recipient of Distinguished Employer Award by MA Regional Employment Collaboratives



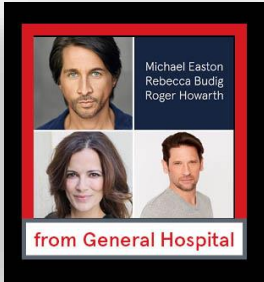
ENTERTAINMENT, SPECIAL EVENTS



Plaza & Armory Activations



Plaza & Armory Activations



- ROAR Comedy Series
- Ice Rink at MGM Plaza

Entertainment & Nightlife



- Slayer
- Michael Carbonara
- Lewis Black
- Classical Mystery Tour: A Beatles Tribute
- Smokey Robinson
- Family Feud
- Vietnamese Show
- Thunder From Down Under

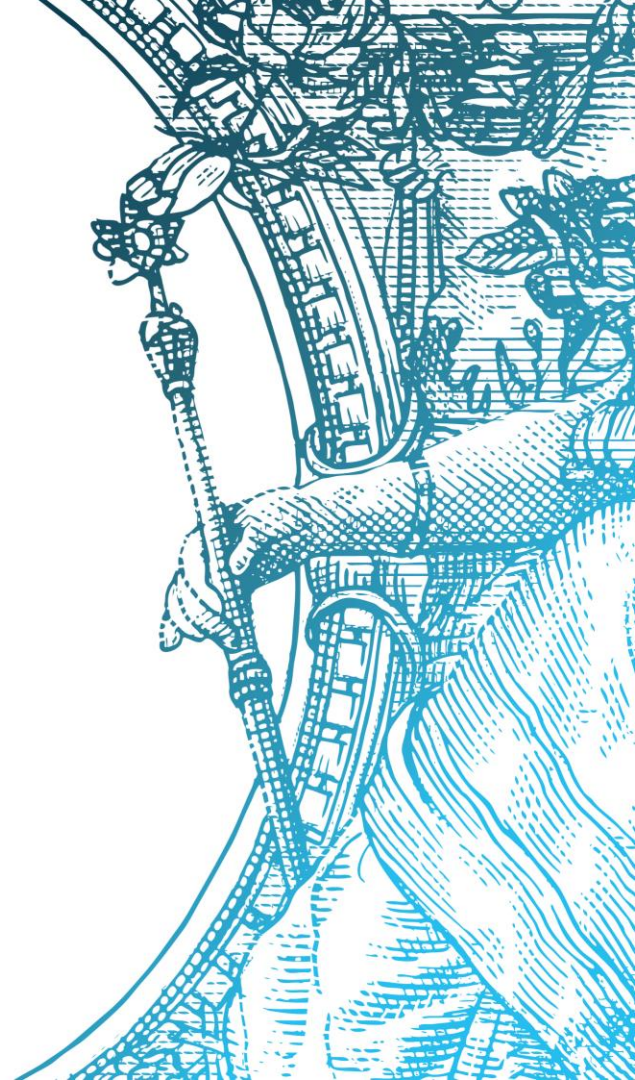
Upcoming Entertainment Calendar

Event Name	Event Date	Event Venue
ROAR! Comedy: Cindy Foster	3/6	The Armory at MGM Springfield
ROAR! Comedy: Anthony Rodia	3/6	The Armory at MGM Springfield
ROAR! Comedy: Todd Barry	3/7	The Armory at MGM Springfield
ROAR! Comedy: Sean Donnelly	3/13-3/14	The Armory at MGM Springfield
ROAR! Comedy: Jade Catta-Preta	3/20-3/21	The Armory at MGM Springfield
Charlie Wilson	3/27	Springfield Symphony Hall
ROAR! Comedy: Steve Byrne	3/27-3/28	The Armory at MGM Springfield

Upcoming Entertainment Calendar

Event Name	Event Date	Event Venue
ROAR! Comedy: Matt Braunger	4/10-4/11	The Armory at MGM Springfield
Marlon Wayans	4/17	Aria Ballroom at MGM Springfield
ROAR! Comedy: Steve Sweeney	4/17	The Armory at MGM Springfield
ROAR! Comedy: Frank Santos Jr	5/2	The Armory at MGM Springfield
ROAR! Comedy: Joselito Da Puppet	5/3	The Armory at MGM Springfield
#IMOMSOHARD	5/28	Symphony Hall Springfield
ROAR! Comedy: Steve Sweeney	5/29-5/30	The Armory at MGM Springfield
Chelsea Handler	6/13	Springfield Symphony Hall

COMMUNITY ENGAGEMENT



Community Engagement



Bright Nights at Forest Park



YWCA of Western Massachusetts



Festival of Trees – Boys & Girls Club

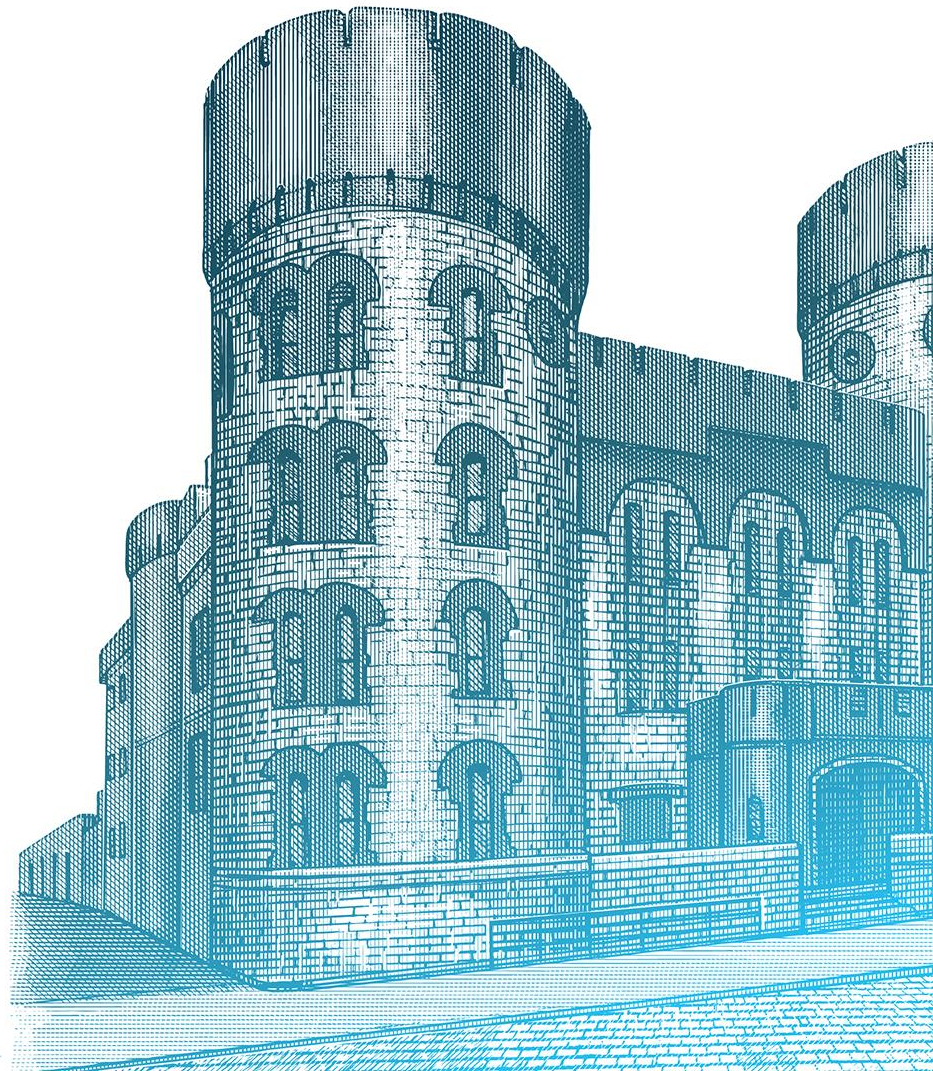


MGM Awards \$1.8M To Neighbor Towns



Food Bank of Western Massachusetts

FUTURE IMPACT



Development Update



- Residential/31 Elm Street
- Wahlburgers
- Armory Plans

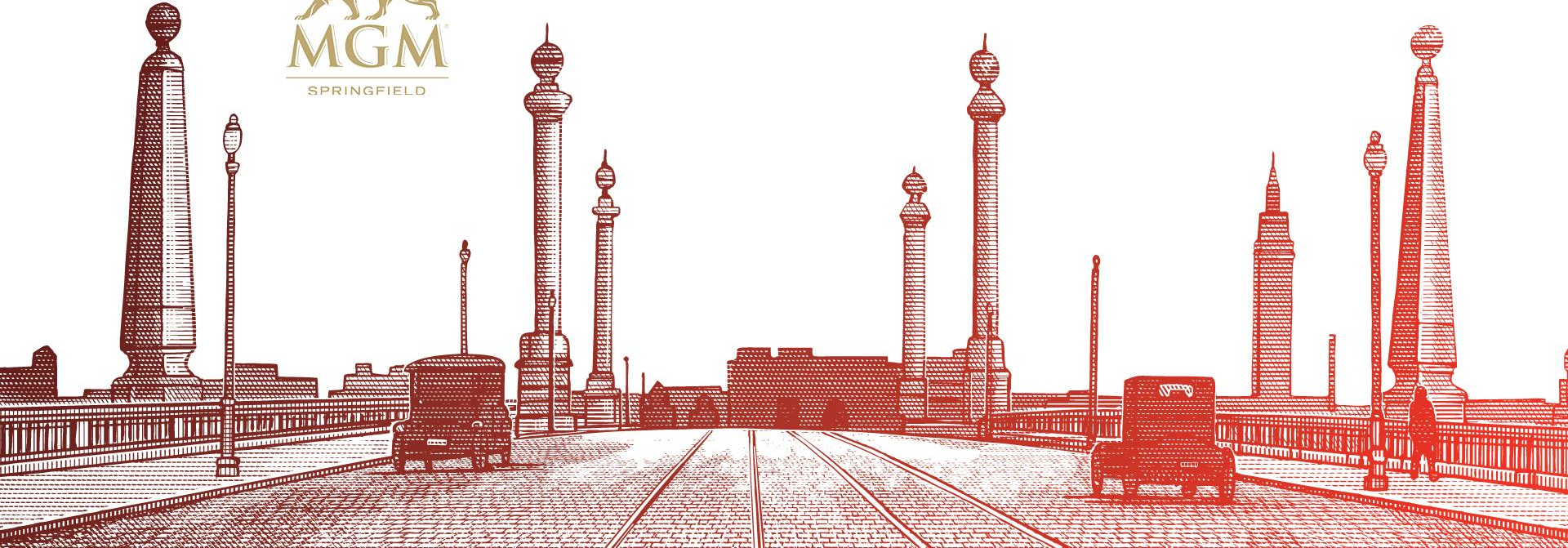
Development Update



- Opening Friday, 2/28
- Classic Italian
- Family-Style
- Housemade pastas, pizza, desserts and more



THANK YOU



MA Council Report:
MGM GameSense
July 1- December 31 2019

Welcome to GameSense at MGM!

- GameSense Information Center (GSIC)
- Team: Amy, Ken, Brandon, Israel, Aisha, Mary (PT) & Ted (PT)
- Hours & Location
- Ongoing professional development



GameSense is a program designed to ensure that gambling remains a safe form of entertainment. It aims to advance an effective, sustainable and socially responsible approach to gambling for both casino patrons and staff.

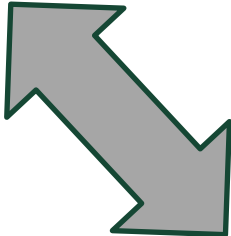
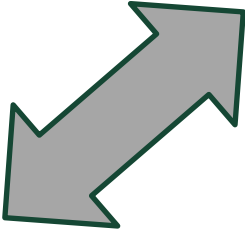
By providing on-site space and designating staff (ie. Gamesense Advisors) to the program, GameSense has greater access to persons who are actively engaged in gambling.

GameSense Advisors have expertise in:

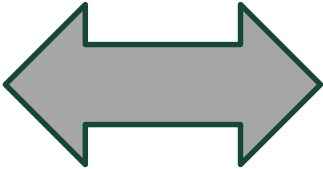
- Understanding the odds and probabilities of winning and losing
- Understanding how slot machines and table games work
- Helping to set win and loss limits
- Helping to set time limits and budgets
- Harm-Reduction programs: marketing & credit/check-cashing
- Voluntary Self Exclusion
- Self-help Meeting Referrals
- Outpatient and Private Practice Treatment Referrals
- Community-Based Resource Referrals



GameSense Advisors design and deliver presentations to high-risk groups in the community. The intent is to reach persons before they visit the casino to promote positive play, reduce gambling related harm, and make them aware of GameSense as a resource.



GameSense
Logic
Model



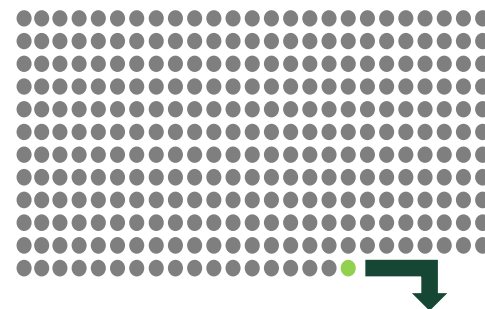
A Logic Model is a graphic depiction (road map) that presents the shared relationships among the resources, activities, outputs, outcomes, and impact for a program. It depicts the relationship between a program's activities and its intended effects.
(Source: Center for Disease Control).

RG Enabled Casino Workforce:

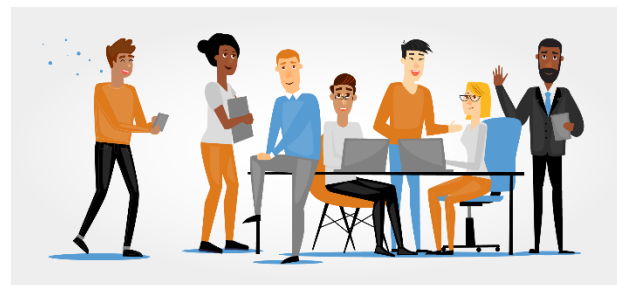
GameSense enables a responsible gaming casino workforce by:

- Increasing RG knowledge and activities among casino staff
- Increasing knowledge of and attitudes towards GS amongst casino staff
- Increasing referrals to GSA by casino staff
- Increasing casino staff and GSA engagement

- Trainings
 - 9/9/19 & 10/23/19: Table Games RG Training
 - 2x a month: New Hire Trainings
- Materials
 - Newsletters
- Magic Moments
 - Slot attendant
 - EVS employee
 - MGM vendor



*MGM GameSense Advisor to MGM staff ratio
1:293*



GameSense enables Positive Play amongst players by:

- Increasing patron knowledge of and attitudes towards GS
- Increasing GSA engagement
- Increasing PlayMyWay (PMW) enrollments (PPC)
- Improving patron literacy, personal responsibility, honesty, control, & pre-commitment
- Improving behaviors reflective of positive play

Promote Positive Play:

- Consider: financial literacy, personal responsibility, honesty, control & pre-commitment
- Data will be collected this FY
 - Patron intercept surveys / Dr. Rachel Volberg
 - GameSense program & activity evaluation / Dr. Richard Wood
 - MGM corporate evaluation of GameSense with special focus on GameSense Springfield / UNLV
- Setting spend *and* win limits



Reduce Gambling Related Harm:

- GameSense Advisors' results:
 - Average of 7,103 simple interactions per month at MGM
 - Average of 962 intensive interactions per month at MGM
 - Average of 11 VSEs per month at MGM
- Community awareness
 - Developing outreach plans & evaluation tools
 - Planning to collaborate with MGM on efforts
 - Will focus on populations at greater risk of gambling problems based on SEIGMA data
 - Continued designated agent training (VSE)
- Magic Moments



GameSense Reduces Gambling Related Harm by:

- Increasing referrals / readiness to engage community resources
- Increasing community awareness for high-risk groups
- Increasing use of Voluntary Self Exclusion (VSE)
- Reducing problem player losses
- Reducing other social and economic harms related to problem gambling.

A special thanks to the legislators who were pioneers in their approach to expanded gaming in the Commonwealth and to the MA Gaming Commission for all of their efforts in support of the GameSense program.

Summary:

- Successful interactions occurring on the gaming floor, in the back of the house, and in the community
- Excellent collaboration between state leaders, industry and public health advocates

Horizon:

- Pay calculator
- More GS tools
- Efficacy data of the GSIC compared to MGM GameSense program expressed differently at other North American properties (UNLV)

Questions?

Thank you!



TO: MGC Chair Judd- Stein, Commissioners Cameron, O'Brien, Stebbins, and Zuniga

FROM: Jill Lacey-Griffin, Director of Workforce, Supplier, and Diversity Development

CC: Karen Wells, Acting Executive Director

DATE: February 27, 2020

RE: Small Business Technical Assistance Grant

Summary

With the express purpose of ensuring that Massachusetts companies continue to be successful in the Expanded Gaming Industry, the Massachusetts Gaming Commission's department of Workforce, Supplier and Diversity Development conceived a grant program to provide targeted, high-powered, one-on-one consulting expertise to small and medium-sized Massachusetts-based companies who are current vendors to one of the three casinos, or a company that is identified by a casino as a potential vendor. Commission staff, in January 2020, selected two qualifying entities to receive \$75,000 each in grant funds which focus on these key objectives:

- Offer technical assistance to companies that have an existing business relationship with one of the three casinos but may need consulting or technical assistance on a specific issue to ensure continued success as a vendor.
- Work with companies that are identified by a casino as a potential vendor but for a specific issue that could be supported by technical assistance
- Work with the casino procurement representatives to identify Massachusetts based and MWVBE businesses in the procurement categories identified as needed by the licensee

Business technical assistance offerings will include designing and executing growth strategies, providing technical expertise around finance/capital management, human resources, back office infrastructure, legal and tax advisory services, operational efficiencies, etc.

Grant Recipients

The Franklin County Community Development Corporation (FCCDC) and the **Local Enterprise Assistance Fund (LEAF)** were selected to be providers of small business technical assistance.

For 40 years, the **Franklin County Community Development Corporation** has been assisting business owners as they work to thrive in changing economic conditions. In addition, for the past 19 years FCCDC has helped hundreds of food businesses utilize shared equipment and space to scale up their operations. The FCCDC is the only organization in this large western MA region that provides comprehensive technical assistance services and financing to small businesses. As businesses grow, they also assist them with financing through their own \$4,500,000 revolving loan funds and by working with



Massachusetts Gaming Commission

banks. FCCDC has provided education, financing, workspace, and individual business counseling to budding businesses in New England. They work with schools, farms, media, insurance companies, and bankers, among others. FCCDC even recently started working with farms and food businesses to run the MA Food Trust program for providing healthy food to low-income areas.

A. For the MGC grant, FCCDC will work to ensure the following:

1. Identify prospects successful in bidding on contracts with gaming licensees in Massachusetts.
2. Provide individual services from industry experts (such as CPA's, attorney, lean manufacturing, human resource, bookkeepers and mentors) to approximately 12-15 select businesses which are identified as working with one of the gaming licensees or having the potential to offer goods/services to one of the gaming licensees, in support of business efficiency and scaling. Technical assistance provision costs shall range between \$3,000.00 and \$5,000.00 per service.
3. Provide collaborative trainings throughout the region both in-person and via video conferencing. In-person training, as well as programs co-sponsored with partners throughout the year, may include scaling a value added food business, business planning and topic specific areas that range from legal issues, QuickBooks and financial management. Video conferencing trainings throughout the Commonwealth may include strategies, process and procedures related to scaling, preparing and sustaining a vendor relationship with casinos.
4. Assistance with the certification process for small businesses to become and MBE/VBE/WBE, as defined in 205 CMR 135.01.

Local Enterprise Assistance Fund is a nonprofit community development organization that helps small businesses maximize profits and expand by providing financial counseling through their Elevate Small Businesses program. They've connected small business clients to big companies such as Whole Foods, Harvard University, Amherst College, Mercy Hospital, and Big Y. In the case of Fresh Food Generation, a Boston catering business, LEAF was able to set up the digital ordering system they needed in order to continue working with major corporate clients and, as a result, enabled FFG to double their staff. LEAF has an established track record of work with MWVBES: in FY2019, 63% LEAF's small business clients were minority-owned and 23% were owned by immigrants/non-English speakers.

B. For the MGC grant, LEAF will work to ensure the following:

5. Identify prospects who have successfully bid on, or are likely to successfully bid on, contracts with gaming licensees in Massachusetts;
6. Provide management, capacity building, business coaching, financial literacy, technology services and capital to approximately 12-15 select businesses which are identified as working with one of the gaming licensees or having the potential to offer goods/services to one of the gaming licensees. Technical assistance provision costs shall range between \$3,000.00 and \$5,000.00 per service;



Massachusetts Gaming Commission

SERVICE TO BE PROVIDED	EXPECTED OUTCOMES
Management and Financial Literacy	<ul style="list-style-type: none"> ● Improve understanding of business management and financial controls ● Increase confidence in business outlook
Specialized Coaching	<ul style="list-style-type: none"> ● Specific problem solving ● Stabilize business ● Improve managerial control of business owners ● Increase confidence in business outlook
Technology Services	<ul style="list-style-type: none"> ● Enhance existing technology capabilities ● Accounting and financial tools & software
Capital Raising	<ul style="list-style-type: none"> ● Develop financial statements, business performance narrative, and presentations ● Support conversations with lenders and investors

7. Assistance with the certification process for small businesses to become and MBE/VBE/WBE, as defined in 205 CMR 135.01: Definitions.

Background:

MGC posted an RFR for small business technical assistance on COMMBUYS on December 3, 2019. Proposals for consideration were due on January 7, 2020. All 7 responses were reviewed by an MGC selection committee by January 13th. On January 16, 2020 two bidders were notified of their award. The proposals submitted by the Local Enterprise Assistance Fund and the Franklin County Community Development Corporation were the finalists for MGC’s small business technical assistance grant.

In 2018 alone, casino licensees spent almost \$1.2 billion during construction, \$17 million during the procurement of goods and services with Massachusetts-based companies and nearly \$237 million with certified MWVBes (total for both construction and operations). Given that all three casinos are now open for business, we expect the procurement opportunities in goods and services to grow. There will be an increased need to work with local businesses, and for those local businesses to be able to support large casino partners. The MGC hopes this pilot will aide in assisting several local, small businesses in ensuring they retain contracts with the casinos, can grow their business to meet the needs of the casino, and/or impact their ability to obtain a bid and/or procurement with one of the casinos. Grant funds are for this current fiscal year with a potential to continue/expand the program based on impact and funding availability.



Massachusetts Gaming Commission

Regulation Review Checklist

Agency Contacts for This Specific Regulation		
Todd Grossman, Carrie Torrisi		
Mark Vander Linden		
Overview		
CMR Number	205 CMR 133.04	
Regulation Title	Voluntary Self-Exclusion: Duration of Exclusion and Removal from the List	
<input checked="" type="checkbox"/> Draft Regulation	<input type="checkbox"/> Final Regulation	
Type of Proposed Action		
<input checked="" type="checkbox"/> Please check all that apply		
<input type="checkbox"/> Retain the regulation in current form.		
<input type="checkbox"/> New regulation (Please provide statutory cite requiring regulation):		
<input type="checkbox"/> Emergency regulation (Please indicate the date regulation must be adopted):		
<input checked="" type="checkbox"/> Amended regulation		
<input type="checkbox"/> Technical correction		
<input type="checkbox"/> Other Explain:		

Summary of Proposed Action
Please describe the purpose of the regulation:
205 CMR 133.00 governs the procedures and protocols relative to the list of self-excluded persons from entering the gaming area of a gaming establishment or any area in which pari-mutuel or simulcasting wagers are placed.
Nature of and Reason for the Proposed Action
The proposed amendment to section .04 revises the period between the reinstatement session and re-entry onto the gaming floor after removal from the Voluntary Self-Exclusion list, to establish uniform procedures.

Regulation Review Checklist

Additional Comments or Issues Not Earlier Addressed by this Review	
Required Attachments	
✓ Please check all that apply	
<input checked="" type="checkbox"/> Redlined version of proposed amendment to regulation, including repeals	<input type="checkbox"/> Clean copy of the regulation if it is a new chapter or if there is a recommendation to retain as is
<input type="checkbox"/> Text of statute or other legal basis for regulation	
<input checked="" type="checkbox"/> Small Business Impact Statement (SBIS)	<input type="checkbox"/> Amended SBIS

205 CMR: MASSACHUSETTS GAMING COMMISSION
205 CMR 133: VOLUNTARY SELF-EXCLUSION

133.04: Duration of Exclusion and Removal from the List

(4) At any time after the expiration of the selected duration of exclusion, an individual may request that their name be removed from the voluntary self-exclusion list by submitting a petition for removal to a **designated agent** on a form approved by the commission. The petition shall include confirmation from a designated agent that the individual completed a **reinstatement** session in accordance with 205 CMR 133.04(5). Any petition for removal received by a **designated agent** prior to the expiration of the duration of the selected exclusion period shall be denied.

The commission shall approve a completed petition for removal. An individual who has selected a lifetime duration in accordance with 205 CMR 133.04(1)(e) may not submit a petition for removal of their name from the list. An incomplete application, including one that fails to demonstrate completion of a **reinstatement** session in accordance with 205 CMR 133.04(5) shall be denied until such time as the application is completed.

(5) To be eligible for removal from the voluntary self-exclusion list the petitioner shall participate in a **reinstatement** session with a designated agent. The **reinstatement** session shall include a review of the risks and responsibilities of gambling, budget setting and a review of problem gambling resources should the petitioner wish to seek them. Upon completion of the **reinstatement** session the designated agent shall sign the individual's petition for removal from the list attesting to the fact that the **reinstatement** session was conducted.

(6) Upon completion of a petition for removal from the voluntary self-exclusion list, a written notice of removal shall be forwarded by the commission, or its designee, to each gaming licensee. The petitioner shall be deemed to be removed from the voluntary self-exclusion list immediately upon completion of the reinstatement session, at which point the petitioner shall be given a receipt verifying said completion and confirming their removal from the voluntary self-exclusion list. A petitioner may be asked to present said confirmation of VSE removal receipt while gaming for 7 days following their reinstatement. Failure to do so may result in administrative difficulties in confirming voluntary self-exclusion status during that time period. A petitioner in possession of this receipt may enter the gaming floor and resume gambling immediately following the reinstatement session, and must present the receipt to a representative from the gaming licensee or the IEB upon request.

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Legal Division

SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this small business impact statement in accordance with G.L. c.30A, §2 relative to the proposed amendment to [205 CMR 133.00: Voluntary Self-Exclusion](#). Specifically, **133.04: Duration of Exclusion and Removal from the List**, notice of which was filed this day with the Secretary of the Commonwealth. This amendment was developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. The amendment revises the period between the reinstatement session and re-entry onto the gaming floor after removal from the Voluntary Self-Exclusion list to establish uniform procedures. This regulation is largely governed by M.G.L. c. 23K, §§ 4(28), and 4(37).

This amendment applies directly to individuals. Accordingly, this amendment is unlikely to have an impact on small businesses. In accordance with G.L. c.30A, §2, the Commission offers the following responses:

1. Estimate of the number of small businesses subject to the proposed regulation:

There are no small businesses that the Commission anticipates will be impacted by this regulation as it applies solely to individuals.

2. State the projected reporting, recordkeeping, and other administrative costs required for compliance with the proposed regulation:

There are no projected reporting, recordkeeping, or administrative costs created by these regulations that would affect small businesses as this amendment applies solely to individuals.

3. State the appropriateness of performance standards versus design standards:

There are no performance or design standards imposed by the proposed amendment to this regulation.

4. Identify regulations of the promulgating agency, or of another agency or department of the Commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.



Massachusetts Gaming Commission

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

This amendment updates the Voluntary Self-Exclusion regulation to ensure uniform procedures within the Commission regarding the Voluntary Self-Exclusion program and therefore are not likely to deter or encourage the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

Shara Bedard
Paralegal
Legal Division

Dated: _____



Massachusetts Gaming Commission

Regulation Review Checklist

Agency Contacts for This Specific Regulation		
Carrie Torrisi		
Karen Wells		
Overview		
CMR Number	205 CMR 134.01	
Regulation Title	Junkets	
<input type="checkbox"/> Draft Regulation	<input checked="" type="checkbox"/> Final Regulation	
Type of Proposed Action		
✓ Please check all that apply		
<input type="checkbox"/> Retain the regulation in current form.		
<input type="checkbox"/> New regulation (Please provide statutory cite requiring regulation):		
<input type="checkbox"/> Emergency regulation (Please indicate the date regulation must be adopted):		
<input checked="" type="checkbox"/> Amended regulation		
<input type="checkbox"/> Technical correction		
<input type="checkbox"/> Other Explain:		

Summary of Proposed Action
Please describe the purpose of the regulation:
This regulation requires independently operating junket representatives to be licensed as key gaming employee-standard.
Nature of and Reason for the Proposed Action
Encore Boston Harbor is requesting authorization to begin running junkets

Regulation Review Checklist

Additional Comments or Issues Not Earlier Addressed by this Review	
Required Attachments	
✓ Please check all that apply	
<input checked="" type="checkbox"/> Redlined version of proposed amendment to regulation, including repeals	<input type="checkbox"/> Clean copy of the regulation if it is a new chapter or if there is a recommendation to retain as is
<input type="checkbox"/> Text of statute or other legal basis for regulation	
<input type="checkbox"/> Small Business Impact Statement (SBIS)	<input checked="" type="checkbox"/> Amended SBIS

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

134.01: Key Gaming Employee Licensees

No individual shall be employed by or perform services for a gaming licensee as a key gaming employee, as defined by M.G.L. c. 23K, § 2, unless the individual has been licensed in accordance with M.G.L. c. 23K, § 30 and 205 CMR 134.00. There shall be two categories of key gaming employee licensees: key gaming employee-executive and key gaming employee-standard.

- (1) An individual holding one of the following positions, and any person in a similar or equivalent position, regardless of job title, whose employment relates to gaming shall be designated as a key gaming employee-executive:
 - (a) Assistant General Manager;
 - (b) Chief Internal Audit Officer;
 - (c) Gaming Manager;
 - (d) Chief Financial Officer;
 - (e) Chief of Security;
 - (f) General Manager;
 - (g) Chief Surveillance Officer;
 - (h) Chief Compliance Officer;
 - (i) Principal executive Officer;
 - (j) Principal operating Officer;
 - (k) Principal accounting Officer;
 - (l) Chief Information Officer;
 - (m) Other executive level employees who are not identified as a key gaming employee-standard in accordance with 205 CMR 134.01(2) as determined by the commission.

- (2) An individual holding one of the following positions, and any person in a similar or equivalent position, regardless of job title, whose employment relates directly to a gaming establishment shall be designated as a key gaming employee-standard:
 - (a) Controller;
 - (b) Electronic gaming device or slot machines manager;
 - (c) Human resources manager;
 - (d) Information technology manager;
 - (e) Pit boss;
 - (f) Shift supervisor of table games, of a slot department, credit department, security, surveillance, accounting department, cage, or player development;
 - (g) Credit manager;
 - (h) Cage manager;
 - (i) Hotel Manager;
 - (j) Entertainment Director;
 - (k) Food & Beverage Manager;
 - (l) Other managerial employees who are not identified as a key gaming employee-executive in accordance with 205 CMR 134.01(1), but who are empowered to make discretionary

decisions which impact gaming establishment operations, or as determined by the commission;

~~(m)~~ Junket representative not employed by a gaming licensee or affiliate of the gaming licensee or a junket enterprise licensed as a gaming vendor in accordance with 205 CMR 134.00.

- (3) Any individual who is a qualifier of a gaming licensee but who does not perform any of the duties of the positions identified in 205 CMR 134.01(1)(a) or (b) does not have to become licensed as a key gaming employee. Such individual does have to be approved as a qualifier and issued a positive determination of suitability in accordance with 205 CMR 111.00: *Phase 1 Application Requirements*, 115.00: *Phase 1 Suitability Determination, Standards and Procedures*, and 116.00: *Persons Required to Be Licensed or Qualified*. An individual who has been issued a positive determination of suitability in accordance with 205 CMR 111.00: *Phase 1 Application Requirements* and who will be performing the responsibilities requiring licensure as a key gaming employee shall apply for licensure in accordance with 205 CMR 134.08(2) subject to the term limitation of 205 CMR 134.16(4).

Regulation Review Checklist

Agency Contacts for This Specific Regulation		
Carrie Torrisi		
Karen Wells		
Overview		
CMR Number	205 CMR 134.06	
Regulation Title	Junkets	
<input type="checkbox"/> Draft Regulation		<input checked="" type="checkbox"/> Final Regulation
Type of Proposed Action		
✓ Please check all that apply		
<input type="checkbox"/> Retain the regulation in current form.		
<input checked="" type="checkbox"/> New regulation (Please provide statutory cite requiring regulation): G.L. c. 23K, s. 5(13) and s. 33		
<input type="checkbox"/> Emergency regulation (Please indicate the date regulation must be adopted):		
<input type="checkbox"/> Amended regulation		
<input type="checkbox"/> Technical correction		
<input type="checkbox"/> Other Explain:		

Summary of Proposed Action
Please describe the purpose of the regulation:
The purpose is to codify licensing requirements, reporting requirements, and restrictions for junket operators.
Nature of and Reason for the Proposed Action
Encore Boston Harbor is requesting authorization to begin running junkets

Regulation Review Checklist

Additional Comments or Issues Not Earlier Addressed by this Review	
Required Attachments	
✓ Please check all that apply	
<input type="checkbox"/> Redlined version of proposed amendment to regulation, including repeals	<input checked="" type="checkbox"/> Clean copy of the regulation if it is a new chapter or if there is a recommendation to retain as is
<input type="checkbox"/> Text of statute or other legal basis for regulation	
<input type="checkbox"/> Small Business Impact Statement (SBIS)	<input checked="" type="checkbox"/> Amended SBIS

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

134.06: Junket Enterprises and Junket Representatives

- (1) Licensing. No person shall conduct business with a gaming licensee as a junket enterprise or junket representative unless such person has been licensed in accordance with 205 CMR 134.00. A person shall be considered to be conducting business upon commencement of performance of a contract or provision of a service. A gaming licensee acting as a junket enterprise shall not be required to obtain additional licensure pursuant to this section.
- (a) All junket enterprise and junket representative license applications submitted pursuant to 205 CMR 134.00 shall include proof of the junket enterprise or junket representative's business relationship with a gaming licensee in the manner prescribed by the Division of Licensing.
- (b) Temporary Licenses. The commission may issue a temporary license to an applicant for a junket enterprise or junket representative license in accordance with 205 CMR 134.12.
- (2) Complimentary services exception. An offer by a gaming licensee to pay for the cost of transportation, food, lodging, and entertainment for a person in an amount to be determined by the actual gaming activities of that person after his or her arrival at the gaming establishment shall be deemed to be an offer of complimentary services or item, as defined in G.L. c. 23K, § 2, for the purposes of whether an arrangement involving such an offer is a junket within the meaning of G.L. c. 23K, § 2 and 205 CMR 134.06.
- (3) Selection of persons for participation in junket.
- (a) As used in G.L. c. 23K, § 2, selection or approval of a person “for participation in a junket on the basis of the person’s ability to satisfy a financial qualification obligation related to the person’s ability or willingness to gamble” shall be deemed to occur whenever a person, as an element of the arrangement, is required to:
1. Establish gaming credit with a gaming licensee;
 2. Establish a customer deposit with a gaming licensee;
 3. Demonstrate to a gaming licensee or agent thereof the availability of a specified amount of cash, cash equivalent, or gaming chips;
 4. Gamble to a predetermined level at a gaming establishment; or
 5. Comply with any similar obligation.
- (b) As used in G.L. c. 23K, § 2, selection or approval of a person on a “basis related to the person’s propensity to gamble” shall be deemed to occur whenever that person has been selected or approved on the basis of:
1. The previous satisfaction of a financial qualification obligation in accordance with the provisions of 205 CMR 134.06(3);
 2. A rating for gambling performance; or

3. An evaluation that the person has a tendency to participate in gambling activities as the result of an inquiry concerning said person's tendency to gamble or some other means of determining that person has a tendency to participate in gambling activities.

- (c) Without limitation of 205 CMR 134.06(3)(b), a rebuttable presumption that a person has been selected or approved for participation in an arrangement on a basis related to his or her propensity to gamble shall be created whenever said person is provided with:
 1. Complimentary guest room accommodations as part of the arrangement; or
 2. Complimentary food, entertainment, or transportation which has a value of \$200 or more.

(4) Reporting requirements.

- (a) Pursuant to M.G.L. c. 23K, § 33, each gaming licensee, junket representative, or junket enterprise shall file a report with the Bureau with respect to each list of junket patrons or potential junket patrons purchased directly or indirectly by the gaming licensee, junket representative, or junket enterprise. The report shall be filed no later than seven days after receipt of the list by the purchaser and shall include:
 1. The name and address of the person or enterprise selling the list;
 2. The purchase price paid for the list, or any other terms of compensation related to the transaction; and
 3. The date of purchase of the list.

- (b) Monthly reports. Each gaming licensee shall, on or before the 15th day of each month, prepare a junket activity report to be kept on file at the gaming establishment, and shall supply to the Bureau the name and license number of each person employed by the gaming licensee who performed the services of a junket representative during the preceding month. The junket activity report shall be made available to the Bureau for inspection upon request and shall contain, at a minimum:
 1. The origin of every junket arriving at the premises;
 2. The number of participants in the junket, including a listing of the names and addresses of all junket participants;
 3. The arrival time and date of the junket;
 4. The departure time and date of the junket;
 5. The name and license number of all junket representatives and junket enterprises involved in the junket; and
 6. The actual amount and type of complimentary services and items provided to each junket participant in accordance with the provisions of 205 CMR 138.13.

(5) Marketing prohibitions on junket enterprises and junket representatives.

- (a) No junket enterprise or junket representative shall authorize or conduct marketing, advertising, and/or promotional communication or activity that specifically targets:
 1. Individuals younger than 21 years old;
 2. Individuals who have requested not to receive marketing materials from the gaming licensee in accordance with the protocols set pursuant to G.L. c. 23K, § 21(a)(18);

3. Individuals who have placed themselves on the voluntary self-exclusion list pursuant to 205 CMR 133.00, *et seq.*; and
4. Individuals who have been placed on the exclusion list pursuant to 205 CMR 152.06.

(b) The gaming licensee shall provide on a monthly basis an aggregated no marketing list to all licensed junket enterprises and junket representatives. Such no marketing list shall include all individuals falling within the categories referenced in 205 CMR 134.06(5)(a).

(6) Additional prohibitions on junket enterprises and junket representatives.

No junket enterprise or junket representative may engage in collection efforts, pay for any services provided to a junket participant, receive any fee from a patron for the privilege of participating in a junket or for the performance of any function for which the junket enterprise or junket representative is licensed, or extend credit to a junket participant.



Legal Division

AMENDED SMALL BUSINESS GAMING 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 proposed amendment to [205 CMR 134.00: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations](#). Specifically, **205 CMR 134.01: Key Gaming Employee Licensees** shall be amended to add Junket representatives, who are not employed by a gaming licensee or affiliate of the gaming licensee or a junket enterprise licensed as a gaming vendor, as Key Gaming Employees. Further, **205 CMR 134.06: Junket Enterprises and Junket Representatives** shall be added to the regulation to describe the scope of responsibility and compliance imposed upon the licensee to employ a junket enterprise or junket representative.

These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth under G.L. c.23K, §16, 30, and 31. The proposed amendments apply directly to junket representatives and junket enterprises, which can be considered small businesses.

Per G.L. c.30A §5, the Commission offers the following responses as to whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder the achievement of the purpose of the proposed regulation:

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

This regulation requires all junket enterprises and junket representatives to be licensed before they may conduct any junket business. There are also reporting requirements that will be imposed on the licensees and consist of conditions that are common among other jurisdictions surveyed. These requisites are imperative to effectuate the regulation.

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, to include junkets created by this regulation or the proposed amendment. However, Key Gaming Employees have a continuing duty to notify and update the Commission of any changes in status as outlined in [205 CMR 134.18: Duties of Applicants and Licensees](#). Initial reporting requirements are in connection with a junket’s application for a Key Gaming Employee license. Specifically, applicants shall include proof of the junket enterprise or junket representative’s business relationship with a gaming licensee in the manner prescribed by the Division of Licensing.



Massachusetts Gaming Commission

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

As a general matter, there are no administrative reporting requirements incurred by this regulation. The compliance and reporting requirements for the application and maintenance of a Key Gaming Employee license are stated above.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed legislation:

These amendments are prescriptive in nature and are appropriate as they ensure regulatory uniformity in Massachusetts as well as other jurisdictions.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

These amendments are not expected to deter or encourage the formation of new businesses in the Commonwealth.

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

The proposed amendments are not likely to create any adverse impact on small businesses.

Massachusetts Gaming Commission

By:

Shara N. Bedard
Paralegal
Legal Division

Dated: _____



Massachusetts Gaming Commission

Regulation Review Checklist

Agency Contacts for This Specific Regulation		
Carrie Torrisi		
Mark Vander Linden		
Overview		
CMR Number	205 CMR 133.05	
Regulation Title	Voluntary Self-Exclusion; Maintenance and Distribution of the List	
<input type="checkbox"/> Draft Regulation	<input checked="" type="checkbox"/> Final Regulation	
Type of Proposed Action		
✓ Please check all that apply		
<input type="checkbox"/> Retain the regulation in current form.		
<input type="checkbox"/> New regulation (Please provide statutory cite requiring regulation):		
<input type="checkbox"/> Emergency regulation (Please indicate the date regulation must be adopted):		
<input checked="" type="checkbox"/> Amended regulation		
<input type="checkbox"/> Technical correction		
<input type="checkbox"/> Other Explain:		

Summary of Proposed Action
Please describe the purpose of the regulation:
The purpose of the regulation relates to the maintenance and custody of the voluntary self-exclusion list.
Nature of and Reason for the Proposed Action
The proposed change will permit licensees to provide an aggregated no-marketing list to junket operators that will include individuals on the voluntary self-exclusion list but will not identify them as being on such list.

Regulation Review Checklist

Additional Comments or Issues Not Earlier Addressed by this Review	
Required Attachments	
✓ Please check all that apply	
<input checked="" type="checkbox"/> Redlined version of proposed amendment to regulation, including repeals	<input type="checkbox"/> Clean copy of the regulation if it is a new chapter or if there is a recommendation to retain as is
<input type="checkbox"/> Text of statute or other legal basis for regulation	
<input type="checkbox"/> Small Business Impact Statement (SBIS)	<input checked="" type="checkbox"/> Amended SBIS

205 CMR 133.00: VOLUNTARY SELF-EXCLUSION

133.05: Maintenance and Custody of the List

- (1) The commission shall maintain an up-to-date database of the voluntary self-exclusion list. Gaming licensees shall be afforded access to the voluntary self-exclusion list. The voluntary self-exclusion list may only be accessed by individuals authorized in accordance with the gaming licensee's approved system of internal controls in accordance with 205 CMR 133.00. All information contained in approved applications for voluntary exclusion may be disclosed to a gaming licensee.
- (2) The list of voluntary self-exclusion is exempt from disclosure under M.G.L. c. 66 and shall not be publicly disclosed by a gaming-licensee. However, a gaming licensee may share the list with other gaming licensees in Massachusetts or its affiliates in other jurisdictions for the purpose of assisting in the proper administration of responsible gaming programs operated by affiliated gaming establishments. Additionally, a gaming licensee shall include the names and contact information of individuals on the voluntary self-exclusion list in its aggregated no marketing list to be shared with junket enterprises and junket representatives in accordance with 205 CMR 134.06(5)(b) for the purpose of effectuating the intent of the voluntary self-exclusion program. Such disclosure shall not be a violation of M.G.L. c. 23K, § 45.
- (3) The commission may disclose de-identified information from the self-exclusion list to one or more research entities selected by the commission for the purpose of evaluating the effectiveness and ensuring the proper administration of the self-exclusion process.



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 proposed amendment to [205 CMR 133.00: Voluntary Self-Exclusion](#). Specifically, **205 CMR 133.05: Maintenance and Custody of the List** shall be amended to support enforcement of the regulation while providing the most effective implementation of the Voluntary Self Exclusion (VSE) program. The amendment was developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth and is primarily governed by G.L. c.23K, §16, 30, and 31.

These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth under G.L. c.23K, §16, 30, and 31. The proposed amendments apply directly to junket representatives and junket enterprises, which can be considered small businesses.

Per G.L. c.30A §5, the Commission offers the following responses as to whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder the achievement of the purpose of the proposed regulation:

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

As a general matter, there are no compliance or reporting requirements for small businesses, including junkets, where a less stringent compliance structure can be implemented.

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, to include junkets, where a less stringent timeline for reporting can be implemented.

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

As a general matter, there are no administrative reporting requirements incurred by this proposed amendment subject to potential simplification.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed legislation:



Massachusetts Gaming Commission

This regulation requires that a junket enterprise or junket operator employs the aggregated no-marketing list provided by the licensee for the purpose of effectuating the intent of the Voluntary Self-Exclusion program.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The proposed regulation is not expected to deter or encourage the formation of new businesses in the Commonwealth.

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

The proposed amendment is not likely to create any adverse impact on small businesses.

Massachusetts Gaming Commission

By:

Shara N. Bedard
Paralegal
Legal Division

Dated: _____



Massachusetts Gaming Commission

Regulation Review Checklist

Agency Contacts for This Specific Regulation		
Name	Email	Phone
Carrie Torrisi		
Loretta Lillios		
Overview		
CMR Number	205 CMR 134.00	
Regulation Title	Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations	
<input type="checkbox"/> Draft Regulation		<input checked="" type="checkbox"/> Final Regulation
Type of Proposed Action		
✓ Please check all that apply		
<input type="checkbox"/> Retain the regulation in current form.		
<input type="checkbox"/> New regulation (Please provide statutory cite requiring regulation):		
<input type="checkbox"/> Emergency regulation (Please indicate the date regulation must be adopted):		
<input checked="" type="checkbox"/> Amended regulation (Please indicate the date regulation was last revised): 8/10/2018		
<input type="checkbox"/> Technical correction		
<input type="checkbox"/> Other Explain:		

Summary of Proposed Action
Please describe the purpose of the regulation:
The proposal amends the attached regulations to reflect changes needed procedurally, and include administrative updates. 205 CMR 134.00 establishes the procedures on the licensing of gaming employees, vendors, and qualifiers.
Nature of and Reason for the Proposed Action
(explain below)
These amendments define the process and standards governing the gaming employee licensing procedure, as well as updating elements of the appeal process, adding a requirement for the fingerprinting procedure, clarification to the procedure for administrative closure of an application, and the addition of a waiting period to reapply for a license.

Regulation Review Checklist

Additional Comments or Issues Not Earlier Addressed by this Review	
Required Attachments	
✓ Please check all that apply	
<input checked="" type="checkbox"/> Redlined version of proposed amendment to regulation, including repeals	<input type="checkbox"/> Clean copy of the regulation if it is a new chapter or if there is a recommendation to retain as is
<input type="checkbox"/> Text of statute or other legal basis for regulation	
<input type="checkbox"/> Small Business Impact Statement (SBIS)	<input checked="" type="checkbox"/> Amended SBIS

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

134.07: Forms

- (1) (a) Key Gaming Employee and Gaming Employee License Application Forms. Every individual applying for a key gaming employee license or a gaming employee license shall be obligated to complete and submit an application to the Division of Licensing. Said application forms shall be created by the Bureau, subject to the approval of the commission. The Division of Licensing may make non-material changes to the form. The license application forms for key gaming employees and gaming employees shall require, at a minimum, the following information:
1. the name of applicant;
 2. the address of applicant;
 3. A detailed employment history of the applicant as prescribed by the Bureau;
 4. the fingerprints of the applicant;
 5. the criminal and arrest record of the applicant; and
 6. any civil judgments obtained against the applicant pertaining to antitrust or security regulation.
- (b) The Bureau may require the applicant to provide additional information, as set forth in the application forms, including, but not limited to:
1. information related to the financial integrity of the applicant;
 2. bank accounts and records of the applicant;
 3. bank references for the applicant;
 4. business and personal income and disbursement schedules of the applicant;
 5. tax returns and other reports filed by government agencies regarding the applicant;
and
 6. business and personal accounting check records and ledgers of the applicant.
- (2) Gaming Service Employee Registration Form. Every individual seeking to register as a Gaming Service Employee shall be obligated to complete and submit a registration form to the Division of Licensing. The registration form shall be created by the Bureau and shall request the disclosure of the information deemed necessary by the Bureau. Any changes to the gaming service employee registration form must be approved by the Director of the Bureau.
- (3) Gaming Vendor License Application Form.
- (a) Every person applying for a gaming vendor license shall be obligated to complete and submit a business entity disclosure form to the Division of Licensing. Said forms shall be created by the Bureau, subject to the approval of the commission. The Division of Licensing may make non-material changes to the form. The license application forms for gaming vendors shall require, at a minimum, the following information:
1. The name of applicant;
 2. The post office address and, if a corporation, the name of the state under the laws of which it was incorporated, the location of its principal place of business and the names and addresses of its directors and stockholders;
 3. The applicant's criminal and arrest record;

4. Any civil judgments obtained against the applicant pertaining to antitrust or security regulation;
5. The identity of every person having a direct or indirect interest in the business and the nature of such interest; provided, however, that if the disclosed entity is a trust, the application shall disclose the names and addresses of all beneficiaries; provided further, that if the disclosed entity is a partnership, the application shall disclose the names and addresses of all partners, both general and limited; and provided further, that if the disclosed entity is a limited liability company, the application shall disclose the names and addresses of all members
6. An independent audit report of all financial activities and interests including, but not limited to, the disclosure of all contributions, donations, loans or any other financial transactions to or from a gaming entity or operator in the past five years
7. Clear and convincing evidence of financial stability including, but not limited to, bank references, business and personal income and disbursement schedules, tax returns and other reports filed by governmental agencies and business and personal accounting check records and ledgers.

(b) Every person designated as a qualifier for a gaming vendor under 205 CMR 134.04(4) shall be obligated to complete and submit a disclosure form to the Division of Licensing. Said forms for gaming vendor qualifiers shall be created by the Bureau, subject to the approval of the commission. The Division of Licensing may make non-material changes to the form.

- (4) Non-gaming Vendor Registration Form. Every person seeking to register as a non-gaming vendor shall be obligated to complete and submit a registration form to the Division of Licensing. The registration form shall be created by the Bureau and shall request the disclosure of any information deemed necessary by the Bureau, subject to the approval of the commission. The Division of Licensing may make non-material changes to the form.
- (5) Labor Organization Registration Statement. Each labor organization, union or affiliate seeking to represent employees who are employed at a gaming establishment shall register with the commission on a form to be created by the Bureau and submitted to the Division of Licensing. Such form shall contain, at a minimum, information to ~~identity~~ identify the officers, agents and/or principals of the organization and information to establish whether the organization and/or any of its officers, agents or principals hold any financial interest in a gaming establishment whose employees are represented by the organization.
- (6) Subcontractor Information Form. A Subcontractor Information Form shall be created by the Bureau requesting any information as deemed necessary by the Bureau and submitted to the Division of Licensing.

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

134.09: Investigation, Determination, and Appeals for Gaming Establishment Employees and Vendors

- (1) Upon receipt of an application for a key gaming employee license in accordance with 205 CMR 134.01, a gaming employee license in accordance with 205 CMR 134.02, a gaming service employee registration in accordance with 205 CMR 134.03, a gaming vendor license in accordance with 205 CMR 134.04(1), a non-gaming vendor registration in accordance with 205 CMR 134.04(4), or the disclosure materials from a gaming vendor qualifier in accordance with 205 CMR 134.04(4), the Division of Licensing shall conduct a review of each ~~for~~ for administrative completeness and then forward the application or submission to the Bureau which shall conduct an investigation of the applicant. In the event an application or submission is deemed incomplete, the Division of Licensing may either request supplemental information from the applicant or qualifier, or administratively close the application in accordance with 205 CMR 134.14. For individuals, the investigation shall include obtaining and reviewing criminal offender record information from the Department of Criminal Justice Information Services (DCJIS) and exchanging fingerprint data and criminal history with the Massachusetts Department of State Police and the United States Federal Bureau of Investigation. The investigation shall be conducted for purposes of determining whether the applicant is suitable to be issued a license or registration in accordance with 205 CMR 134.10 and 134.11.

In determining the weight to be afforded any information bearing on suitability in accordance with 205 CMR 134.10 and 134.11, the Division of Licensing, Bureau, or commission, as applicable, shall consider: the relevance of the information to employment in a gaming establishment or doing business with a gaming establishment in general, whether there is a pattern evident in the information, and whether the applicant is likely to be involved in ~~gaming-gaming~~-related activity. Further, the information will be considered in the light most favorable to the applicant unless the information cannot be so viewed pursuant to M.G.L. c. 23K or the information obtained does not otherwise support such a view. For purposes of 205 CMR 134.00 and ~~M.G.L. c. 23K, § 16~~ M.G.L. c. 23K, § 16, an adjudication of delinquency shall not be considered a conviction. Such a finding may, however, be considered for purposes of determining the suitability of an applicant. Records of criminal appearances, criminal dispositions, and/or any information concerning acts of delinquency that have been sealed shall not be considered for purposes of making a suitability determination in accordance with 205 CMR 134.00 and M.G.L. c. 23K.

- (a) ~~Keys Gaming Employees-executive, Key Gaming Employee-standard, and Gaming Employees.~~ Keys Gaming Employees-executive, Key Gaming Employee-standard, and Gaming Employees. Upon completion of the investigation conducted in accordance with 205 CMR 134.09(1), the Bureau shall either approve or deny the application for a key gaming employee ~~executive license, key gaming employee standard license~~ or a gaming employee license pursuant to 205 CMR 134.10. If the application for a Key Gaming Employee ~~standard~~ license or Gaming Employee license is approved, the Bureau shall forward a written approval to the Division of Licensing which shall issue a license to the applicant on behalf of the Commission. ~~If the Bureau approves the application for a Key Gaming Employee executive, the decision shall be~~

~~forwarded to the Commission as a recommendation along with the application materials for review and issuance of the license.~~ If the application is denied, the Bureau shall forward the ~~recommendation for~~ determination of denial and reasons therefor to the Division of Licensing which shall issue a written decision to the applicant explaining the reasons for the denial. The decision shall include an advisory to the applicant that they may appeal the decision in accordance with 205 CMR 101.00: *M.G.L. c.23K Adjudicatory Proceedings*. If the denial is based upon information contained in the individual's criminal record, the decision shall also include an advisory that the individual will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The decision may be served via first class mail or ~~via~~ email to the addresses provided by the applicant on the application.

- (b) Gaming Service Employees. The Division of Licensing shall issue a gaming service employee registration to the applicant on behalf of the commission in accordance with 205 CMR 134.11(1). In the event that the Bureau determines upon completion of the investigation conducted in accordance with 205 CMR 134.09(1) that the applicant should be disqualified from holding a registration or is otherwise unsuitable in accordance with 205 CMR 134.11, it shall forward the results of the investigation to the Division of Licensing which shall issue a written notice to the registrant denying or revoking the registration. The notice shall include an advisory to the applicant that they shall immediately cease employment at the gaming establishment and may request an appeal hearing in accordance with 101.00: *M.G.L. c. 23K Adjudicatory Proceedings*. If the denial is based upon the information contained in the individual's criminal record, the decision shall also include an advisory that the individual will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The notice may be served via first class mail or via email to the addresses provided by the applicant on the application.
- (c) Gaming Vendors. Upon completion of the investigation, conducted in accordance with 205 CMR 134.09(1), the Bureau shall either approve or deny the application for a gaming vendor license pursuant to 205 CMR 134.10. If the Bureau approves the application for a Gaming Vendor, the Bureau shall forward a written approval to the Division of Licensing which shall issue a license to the applicant on behalf of the eCommission. If the application is denied, the Bureau shall forward the determination of denial and reasons therefor to the Division of Licensing which shall issue a written decision to the applicant explaining the reasons for the denial. The decision shall include an advisory to the applicant that they may appeal the decision in accordance with 205 CMR 101.00: *M.G.L. c. 23K Adjudicatory Proceedings*. If the denial is based upon information contained in a person's criminal record, the decision shall also include an advisory that the person will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The decision may be served via first class mail or ~~via~~ email to the addresses provided by the applicant on the application.
- (d) Non-gaming Vendors. The Division of Licensing shall issue a non-gaming vendor registration to the applicant on behalf of the commission in accordance with 205 CMR 134.11(1). In the event that the Bureau determines, upon completion of the

investigation conducted in accordance with 205 CMR 134.09(1), that the applicant should be disqualified from holding a registration or is otherwise unsuitable in accordance with 205 CMR 134.11, it shall forward the results of the investigation to the Division of Licensing which shall issue a written notice to the registrant denying or revoking the registration. The notice shall include an advisory to the applicant that they shall immediately cease doing business with the gaming establishment and may request an appeal hearing in accordance with 205 CMR 101.00: *M. G.L. c. 23K Adjudicatory Proceedings*. If the denial is based upon the information contained in the person's criminal record, the decision shall also include an advisory that the person will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The notice may be served via first class mail or via email to the addresses provided by the applicant on the application.

- (e) Labor Organizations. The Bureau shall issue a Labor Organization registration to the applicant on behalf of the commission in accordance with 205 CMR 134.11(1).

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

134.10: Affirmative License Standards for the Licensing of Employees and Vendors of the
Gaming Establishment

- (1) An applicant for a key gaming employee license, gaming employee license, gaming vendor license, and a gaming vendor qualifier shall establish its individual qualifications by clear and convincing evidence.
- (2) In determining whether an applicant for licensure is suitable for purposes of being issued a key gaming employee license, gaming employee license or gaming vendor license, or **for** having any of these licenses renewed, the Bureau shall evaluate and consider the overall reputation of the applicant and qualifiers, if any, including, without limitation:
 - (a) the integrity, honesty, good character and reputation of the applicant and qualifiers;
 - (b) the financial stability, integrity, and background of the applicant and qualifiers
 - (c) whether the applicant and its qualifiers have a history of compliance with gaming licensing requirements in other jurisdictions;
 - (d) whether the applicant or any qualifier, at the time of application, is a defendant in litigation;
 - (e) whether the applicant is disqualified from receiving a license under 205 CMR 134.10(3);
 - (f) whether the applicant or any qualifier has been convicted of a crime of moral turpitude;
 - (g) whether, and to what extent, the applicant or any qualifier has associated with members of organized crime and other persons of disreputable character;
 - (h) the extent to which the applicant and qualifiers have cooperated with the Bureau in connection with the background investigation;
 - (i) (for vendors) the integrity, honesty, and good character of any subcontractor.
- (3) The Bureau and commission shall deny an application for a key gaming employee license, gaming employee license or gaming vendor license, if the applicant:
 - (a) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; except that for such disqualifying convictions under M.G.L. c. 23K, § 16 and 205 CMR 134.10(3)(a) which occurred before the ten-year period immediately preceding submission of the application for licensure, the Bureau may, in its discretion, approve the issuance of a gaming employee license to an applicant who affirmatively demonstrates rehabilitation in accordance with 205 CMR 134.10(4);
 - (b) submitted an application for a license under M.G.L. c. 23K, § 30 and 205 CMR 134.00 that willfully, knowingly or intentionally contains false or misleading information;
 - (c) committed prior acts which have not been prosecuted or in which the applicant was not convicted but form a pattern of misconduct that makes the applicant unsuitable for a license; or
 - (d) has affiliates or close associates that would not qualify for a license or whose relationship with the applicant may pose an injurious threat to the interests of the Commonwealth in awarding a gaming license to the applicant.

(4) Rehabilitation.

- (a) An applicant for a Key gaming employee license, gaming employee license, gaming vendor license or a gaming vendor qualifier may provide proof of rehabilitation from a criminal conviction as part of the application for licensure.
- (b) An applicant for a Key gaming employee license may not appeal a decision made by the Bureau that was based upon a disqualifying prior conviction in accordance with 205 CMR 134.10(3)(a) on the basis that they wish to demonstrate rehabilitation.
- ~~(c) An applicant for a Gaming employee license or gaming vendor qualifier license may appeal a decision made by the Bureau based upon a disqualifying prior conviction in accordance with 205 CMR 134.10(3)(a) on the basis that they wish to demonstrate rehabilitation only if the conviction occurred before the ten year period immediately preceding the date of submission of the application for licensure or registration.~~
- ~~(d)(c) A Gaming employee license or Gaming vendor qualifier license may be issued to an applicant who can affirmatively demonstrate rehabilitation. In considering the rehabilitation of an applicant the following shall be considered:~~
1. the nature and duties of the position of the applicant.
 2. the nature and seriousness of the offense or conduct;
 3. the circumstances under which the offense or conduct occurred
 4. the date of the offense or conduct
 5. the age of the applicant when the offense or conduct was committed;
 6. whether the offense or conduct was an isolated or repeated incident;
 7. any social conditions which may have contributed to the offense or conduct; and
 8. any evidence of rehabilitation, including recommendations and references of persons supervising the applicant since the offense or conduct was committed.
- ~~(e) Any applicant may appeal a decision made by the Bureau based upon a conviction for a crime of moral turpitude as set forth in 205 CMR 134.10(2)(f). A Key gaming employee license, Gaming employee license, or gaming vendor qualifier license may be issued to an applicant who can affirmatively demonstrate rehabilitation. In considering the rehabilitation of an applicant, the factors outlined in 205 CMR 134.10(4)(d) shall be considered.~~
- ~~(f)(d)~~ (d) An applicant for a license or registration shall be at least 18 years of age at the time of application.

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

134.11: Affirmative Registration Standards for the Registration of Employees and Vendors of
the Gaming Establishment and Labor Organizations

- (1) Upon submission of an administratively complete registration form as a gaming service employee or non-gaming vendor, the Division of Licensing shall issue the registration on behalf of the commission in accordance with 205 CMR 134.09(1). A registration may be denied or subsequently revoked if it is determined that the applicant is disqualified in accordance with 205 CMR 134.11(2) or unsuitable for any criteria identified in 205 CMR 134.11(3).
- (2) The Bureau and commission shall deny and/or revoke a registration as a gaming service employee or non-gaming vendor if the person:
 - (a) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; except that for such disqualifying convictions under M.G.L. c. 23K, § 16 and 205 CMR 134.11(2)(a) which occurred before the ten-year period immediately preceding submission of the registration, the Bureau may, in its discretion, decline to deny or revoke the registration of a person who affirmatively demonstrates rehabilitation in accordance with 205 CMR 134.11(4).
 - (b) submitted a registration form under M.G.L. c. 23K, § 30 and 205 CMR 134.00 that willfully, knowingly or intentionally contains false or misleading information;
 - (c) committed prior acts which have not been prosecuted or in which the registrant was not convicted but form a pattern of misconduct that makes the registrant unsuitable; or
 - (d) has affiliates or close associates that would not qualify for a license or whose relationship with the registrant may pose an injurious threat to the interests of the Commonwealth in awarding a registration.
- (3) In determining whether a registrant is suitable for purposes of being issued a gaming service employee registration or non-gaming vendor registration, or having a registration renewed, the Bureau may evaluate and consider the overall reputation of the registrant including, without limitation:
 - (a) the integrity, honesty, good character and reputation of the registrant;
 - (b) the financial stability, integrity, and background of the registrant;
 - (c) whether the registrant has a history of compliance with gaming licensing requirements in other jurisdictions;
 - (d) whether the registrant, at the time of submission of the registration form, is a defendant in litigation;
 - (e) whether the registrant is disqualified from receiving a registration under 205 CMR 134.11(2);
 - (f) whether the registrant has been convicted of a crime of moral turpitude;
 - (g) whether, and to what extent, the individual has associated with members of organized crime and other persons of disreputable character;
 - (h) the extent to which the individual has cooperated with the Bureau in connection with the background investigation;

(i) (for vendors) the integrity, honesty, and good character of any subcontractor.

(4) Rehabilitation.

~~(a) The holder of a Gaming service employee registration or non-gaming vendor registration may appeal a decision made by the Bureau based upon a disqualifying prior conviction in accordance with 205 CMR 134.11(2) on the basis that they wish to demonstrate rehabilitation only if the conviction occurred before the ten-year period immediately preceding application for licensure or registration.~~

~~(b)(a) A Gaming service employee registration or a non-gaming vendor registration may be issued to an applicant who can affirmatively demonstrate rehabilitation.~~ In considering the rehabilitation of an applicant, the following shall be considered:

1. the nature and duties of the position of the applicant;
2. the nature and seriousness of the offense or conduct;
3. the circumstances under which the offense or conduct occurred;
4. the date of the offense or conduct;
5. the age of the applicant when the offense or conduct was committed;
6. whether the offense or conduct was an isolated or repeated incident;
7. any social conditions which may have contributed to the offense or conduct; and
8. any evidence of rehabilitation, including recommendations and references of persons supervising the applicant since the offense or conduct was committed.

~~(c) Any applicant may appeal a decision made by the Bureau based upon a conviction for a crime of moral turpitude as set forth in 205 CMR 134.11(3). A Gaming service employee registration or non-gaming vendor registration may be issued to an applicant who can affirmatively demonstrate rehabilitation. In considering the rehabilitation of an applicant, the factors outlined in 205 CMR 134.11(4)(b) shall be considered.~~

(5) An applicant for a registration shall be 18 years of age or older at the time of application.

(6) The Bureau may deny an application for registration as a non-gaming vendor if it determines that the applicant formed the applicant entity for the sole purpose of circumventing 205 CMR 134.04(1)(b).

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
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134.13: Fingerprinting

Each applicant for a key gaming employee license, gaming employee license, gaming service employee registration, and each qualifier for a gaming vendor applicant or licensee, shall be fingerprinted under the supervision of the commission. Each such applicant shall provide identification at the time of fingerprinting in the manner required by the Bureau. The Bureau in its discretion may require one or more officers or employees of any non-gaming vendor registrant to be fingerprinted under the supervision of the commission. The commission may, for good cause shown, permit an applicant to alternatively submit ~~three~~two sets of classifiable fingerprints on fingerprint impression cards provided by the commission.

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
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134.14: Administrative Closure of Applications for Registration or Licensure

(1) All applicants for a Key Gaming Employee License, a Gaming Employee License, a Gaming Vendor License, a Gaming Service Employee Registration or a Non-gaming Vendor Registration shall promptly respond to any request for information from the Division of Licensing and/or the Bureau. This obligation is in addition to the continuing duty set forth in 205 CMR 134.18(1).

(2) Failure of an applicant for a Key Gaming Employee License, a Gaming Employee License, ~~a Gaming Vendor License,~~ or a Gaming Service Employee Registration, ~~or a Non-gaming Vendor Registration~~ to respond to a request for information from the Division of Licensing and/or the Bureau within ~~21~~ 14 days of the request may result in the administrative closure of the application for registration or licensure and the corresponding administrative revocation of a registration or temporary license, if applicable.

(3) ~~Failure of an applicant for a Gaming Vendor License or a Non-Gaming Vendor Registration to respond to a request for information from the Division of Licensing and/or the Bureau within 21 days of the request may result in the administrative closure of that license application or registration and the corresponding administrative revocation of a registration or temporary license, if applicable.~~

(4) In the event that an application for registration or licensure is administratively closed for failure to provide requested information or to comply with the obligations set forth in either 205 CMR 134.14 or 205 CMR 134.18(1), the Division of Licensing ~~or the Bureau~~ will notify the applicant of the determination ~~by~~ in writing ~~which~~ and will identify ~~identifies~~ the specific deficiencies in the application that served as the basis for the closure. ~~Once an application for registration or licensure has been administratively closed, the applicant is required to submit a new application in order to be considered for licensure or registration. In that event, the applicant shall submit a complete application including all outstanding information as previously detailed by the Division of Licensing or the Bureau. The submission of outstanding information is not a guarantee of licensure/registration, but is a prerequisite for the application to be deemed administratively complete.~~

~~(4) An applicant may submit a new application for a Key Gaming License, Gaming Employee License, Gaming Vendor License, Gaming Service Employee Registration, or Non-gaming Vendor Registration after an application has been administratively closed in accordance with 205 CMR 134.14(3). In that event, the applicant shall submit a complete application including all outstanding information as previously detailed in the administrative closure notification from the Division of Licensing. The submission of outstanding information is not a guarantee of licensure/registration, but is a prerequisite for the application to be deemed administratively complete.~~

~~(5) An applicant, whose application has been administratively closed for failure to maintain ongoing employment by a gaming licensee in accordance with 205 CMR 134.08(1)(b), may submit a new application for licensure or registration, provided the application is submitted with proof of a new offer of employment from a gaming licensee.~~

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS,
JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

134.20: Application Following Denial or Revocation

No individual who has been denied a license or registration or has had their license or registration revoked pursuant to 205 CMR 134 may reapply for the same license or registration prior to two years from the date of denial or revocation. If an individual has appealed the denial or revocation of their license or registration, the two year period shall begin to run from the date that the denial or revocation is affirmed pursuant to 205 CMR 101 or otherwise pursuant to G.L. c.30A.



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 proposed amendment to [205 CMR 134.00: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations](#). These amendments include a set of proposed regulation updates resulting from a review of licensing operations to identify areas for process improvement, to gain efficiencies, and to make administrative revisions. The amendments pertain to the process and standards governing the gaming employee licensing procedure, as well as updating elements of the appeal process, adding a requirement for the fingerprinting procedure, clarification to the procedure for administrative closure of an application, the addition of a waiting period to reapply for a license, and adding clarification to the internal controls procedure.

These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth and is primarily governed by G.L. c.23K, §16, 30, and 31.

Per G.L. c.30A §5, the Commission offers the following responses as to whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder the achievement of the purpose of the proposed regulation:

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

As a general matter, no compliance or reporting requirements exist for small businesses, including junkets, where a less stringent compliance structure can be implemented.

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, to include junkets, where a less stringent timeline for reporting can be implemented.

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

As a general matter, there are no administrative reporting requirements incurred by this proposed amendment subject to potential simplification.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed legislation:



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Some of the amendments described are prescriptive in nature. They are appropriate because every participant should have access to a uniform regulatory process. The best way to ensure this uniformity is via prescriptive rule of procedure. Conversely, other amendments are only administrative in nature.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The proposed regulation is not expected to deter or encourage the formation of new businesses in the Commonwealth.

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

The proposed amendments are not likely to create any adverse impact on small businesses.

Massachusetts Gaming Commission

By:

Shara N. Bedard
Paralegal
Legal Division

Dated: _____



Massachusetts Gaming Commission