



**MASSACHUSETTS GAMING COMMISSION
PUBLIC MEETING #242**

May 10, 2018
10:00 a.m.

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



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com



**NOTICE OF MEETING and AGENDA
May 10, 2018**

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, May 10, 2018
10:00 a.m.
101 Federal Street, 12th Floor
Boston, MA**

PUBLIC MEETING - #242

1. Call to order
2. Approval of Minutes
 - a. April 26, 2018 – **VOTE**
3. Administrative Update – Ed Bedrosian, Executive Director
 - a. General Update
 - b. MGM - Opening Update
4. Research and Responsible Gaming – Mark Vander Linden, Director
 - a. Responsible Gaming Framework – **VOTE**
 - b. Two Year Lottery Report - Mark W. Nichols, University of Nevada, Reno and University of Massachusetts Donahue Institute, Economic and Public Policy Research Group and Dr. Rachel Volberg, SEIGMA Principal Investigator, UMass Amherst School of Public Health
 - c. Mass-At-A-Glance Data Sharing Demonstration - Valerie Evans, Biostatistician, SEIGMA Project, UMASS Amherst and Dr. Rachel Volberg, SEIGMA Principal Investigator, UMass Amherst School of Public Health
5. Licensing Division – Paul Connelly, Director
 - a. Plainridge Park Casino Service Employee Exemptions – **VOTE**
6. Legal Division – Catherine Blue, General Counsel
 - a. Amendments to 205 CMR 146.00: Gaming Equipment and Small Business Impact Statement, for approval to begin the formal promulgation process – **VOTE**
 - b. Amendments to 205 CMR 134.03: Gaming Service Employees and Small Business Impact Statement, for approval to promulgate by emergency – **VOTE**



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7. Racing Division – Alex Lightbown, Director and Chief Veterinarian
 - a. Jockey Guild Payments
8. Workforce, Supplier and Diversity Development – Jill Griffin, Director
 - a. Expanding Economic Access Grants:
 - i. Chelsea Collaborative – Gladys Vega, Executive Director
 - ii. La Comunidad – Antonia Amaya, Executive Director
 - iii. Asian American Civic Association – Lisa Wong, Deputy Director and Ivy Mah, Employment Center Coordinator
9. Commissioner's 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.

5/8/18
Date


Enrique Zuniga, Commissioner

Date Posted to Website: May 8, 2018 at 10:00 a.m.



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Massachusetts Gaming Commission Meeting Minutes

Date/Time: April 26, 2018 – 1:00 p.m.

Place: MassMutual Center
1277 Main Street
Springfield, MA 01103

Present: Chairman Stephen P. Crosby
Commissioner Gayle Cameron
Commissioner Eileen O'Brien
Commissioner Bruce Stebbins
Commissioner Enrique Zuniga

Time entries are linked to
corresponding section in
Commission meeting video

Call to Order

See transcript page 2

[1:00 p.m.](#) Chairman Crosby called to order the 241st Commission meeting.

Approval of Minutes

See transcript pages 2 – 3

Commissioner Stebbins moved to approve the minutes of the meeting of April 12, 2018, subject to correction for typographical errors and other nonmaterial matters. Commissioner Stebbins requested corrections in terms of reference to organizations and a typo on page seven. Commissioner Cameron seconded the motion.

The motion was approved as amended, 5 – 0.

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Administrative Update

See transcript pages 3 - 27

1:02 p.m.

MGM – Opening Update.

Executive Director Edward Bedrosian reported that there is an official opening date of August 24th, 2018 for the MGM Casino.

The Commission's current objectives at this time are to issue a gaming operations certificate and have a sufficient number of trained gaming agents. Executive Director Bedrosian reported that a training session would be starting in about the third week of May for gaming agents. Gaming agents' initial task will be inspecting slot machines and tables prior to opening.

Executive Director Bedrosian noted that the Gaming Enforcement Unit is in the final stages of the Memorandum of Understanding (MOU) being signed, and are selecting officers and troopers from the Massachusetts State Police and Springfield Police.

Paul Connelly, Director of Licensing and Jill Griffin, Director of Workforce, Supplier Development and Diversity Development will be working with Marikate Murren, MGM Springfield Vice President to monitor the number of applicants on a weekly basis.

Mark Vander Linden, Director of Research and Responsible Gaming is working with the Massachusetts Council on Compulsive Gambling to ensure that the GameSense space is ready, with hired and trained GameSense agents.

The Commission has been working with the City of Springfield regarding construction, the overall readiness of the police, and shared revenue accounting matters.

Finally, Executive Director Bedrosian stated that the Commission will need to approve the overall gaming liquor license for the property.

1:04 p.m.

City of Springfield Presentation

Kevin Kennedy, Chief Development Officer for the City of Springfield, and Brian Connors, Director of Economic Development for the City of Springfield gave a presentation entitled, "The New Springfield". The presentation touched on the overall economic development and the investment in the city since the beginning of the MGM project.

The improvements to Springfield include several new attractions, new residential units, repaired roads with a pedestrian way-finding system, new police substation with police kiosks, a bike share program, renovated parks, and a rehabilitated railway station. Springfield is also host to Eversource's largest solar installation in Massachusetts.

Ombudsman

See transcript pages 27 - 74

1:15 p.m.

Designation of MGM Springfield Gaming Floor

Ombudsman John Ziemba presented the Commission's designation of the MGM Springfield gaming floor with Seth Stratton, MGM Springfield Vice President and Legal Counsel, and Alex Dixon, MGM Springfield General Manager.

Pursuant to 205 CMR 138, MGM is required to submit a floor plan for approval. Counsel Stratton presented finalized floor plans proposed for the gaming area, defining boundaries around areas with gaming activity, minor access, employee access, and alcohol sales. He also noted that the gaming area is approx. 88,000 square feet.

The Commission expressed concern about whether or not minors would be able to access the gaming area. Mr. Dixon explained that signage would be in place, as well as communication through social media, press releases, and other mass media about where minors are able to go and not able to go. There was discussion around security and efforts that will be made to manage blocking minors from accessing the gaming floor and bar area.

Bruce Band, IEB Assistant Director/Gaming Agents Division Chief explained the proposed practice of allowing minors to use designated paths to transverse the floor with non-gaming space. He noted that this method is successful in other establishments. He suggested that the Commission implement this method with the understanding that they could give the executive director the ability to stop it if it is determined problematic by reviewing security and surveillance reports.

1:50 p.m.

*Commissioner Zuniga moved that the Commission approve the gaming area as depicted, accepting the traverse areas designated in green and the gaming area designated in red, and delegate to the Executive Director the ability to make any modifications after opening day and bring back to the Commission if needed. Commissioner Cameron seconded.
The motion passed 5 – 0.*

Designation of MGM Springfield Gaming Establishment

Ombudsman John Ziemba presented the Commission's designation of the MGM gaming establishment. Changes were made to the boundaries of the MGM construction project. Ombudsman Ziemba recommended that the Commission approve the new boundary, provided that they agree to review the site plan again, no later than March 31, 2019. By that time, the Commission will have significant new information about MGM Springfield's plans for the facility, including but not limited to its plans for 101 State Street.

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Clarification was made that there will be no major construction either on the first floor or for the remainder of the building at 101 State by opening date, as construction must meet the LEED Gold standard. The Commission would need to take action regarding that in the future as part of any Section 61 finding changes or revisions would need to be brought back to the Commission. It was also recommended that the Commission add the residential units into the definition of 'project' as defined in 205 CMR 135, and it was acknowledged that this topic would also be discussed further in the future.

[2:11 p.m.](#)

Commissioner Cameron moved that the Commission approve Blue Tarp reDevelopment's proposed gaming establishment boundary as presented to the Commission today and that the Commission's decision awarding a license to operate a Category 1 gaming establishment in Region B dated November 7, 2014 be amended by striking Exhibit B in its entirety and replacing with the new Exhibit B consisting of a revised gaming establishment boundary included in the Commission packet and presented at today's meeting provided that the Commission will review the gaming establishment boundary by the end of the first quarter of 2019 to determine what, if any, additional adjustments may be needed, including the status of the first floor of 101 State Street and provided further that this approval shall not amend any Commission Section 61 finding in the amendment of which will require separate action by the Commission to the extent necessary.

*Commissioner Cameron further moved that the Commission find that for purposes of 205 CMR 135, the residential units included in the construction schedule approved by the Commission at the April 12, 2018 Commission meeting are included in the definition of project under 205 CMR 135. Commissioner Stebbins seconded.
The motion passed 5 – 0.*

Workforce, Supplier and Diversity Development

See transcript pages 74 - 130

[2:14 p.m.](#)

MGM Springfield Plan to Identify Local Vendors

Jill Griffin, Director of Workforce, Supplier Development and Diversity Development presented the MGM Springfield Procurement Diversity and Local Business Plan with Ryan Geary, Operations Controller of MGM Springfield, Eddie Estrella, Assistant Manager for Strategic Sourcing, Chelan Brown, Manager of Diversity for MGM Springfield.

License condition 17 of the Massachusetts Gaming Commission's agreement to award a Category 1 license to Blue Tarp reDevelopment states that MGM Springfield is required to submit this plan to identify local vendors. Director Griffin presented a memo that reviewed the contents of the plan and discussed the requirements.

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Mr. Geary gave a slide presentation on the MGM Springfield Procurement Diversity and Local Business Plan and reviewed their goals and strategies, as well as some of the sample reporting that they would be providing quarterly moving forward.

Ms. Brown discussed opportunities for local and diverse members of the Community Partners Network. She explained that the Community Partners Network was created from the construction side of the house, and that they sought to replicate the successes of working with the community and partnering with the community on the operational side of the house for opportunities for local and diverse vendors.

Mr. Geary explained the Vendor Advisory Task Force Meeting that they partner with the MGC and also with their local certification partners to identify opportunities and match suppliers.

Director Griffin recommended that the Commission approve the plan as it satisfies the license condition 17.

2:52 p.m.

Commissioner Stebbins moved that the commission approve the MGM Springfield Procurement Diversity and Local Business Plan as provided in the packet.

Commissioner Zuniga seconded.

Motion was approved 5 – 0.

Expanding Economic Access Grants

Director Griffin announced grants for Expanding Economic Access Grants with Sheriff Nick Cocchi of the Hampden County Sherriff and his team, as well as Sheila Cuddy with the Quaboag Valley Community Development Corporation on hand to acknowledge the awards.

Crystal Howard, Project Coordinator for the Workforce Supplier and Diversity Development Department gave an overview of the grant program offered by the Commission's Workforce Supplier and Diversity Development department. The objective of the program is to ensure that grass roots, diverse, community and business groups are part of the outreach effort.

Ms. Howard stated that the team organized a committee for review of the 17 different proposals received. The committee is comprised of Derek Lennon, Chief Financial and Accounting Officer, Trupti Banda, Human Resource Manager, Commissioner Bruce Stebbins, Jill Griffin, Director of Workforce, Supplier and Diversity Development and herself.

The organizations included the Hampden County Sheriff Department, Quaboag Valley Community Development Corporation, the Asian American Civic Association, Best Hospitality Training, Chelsea Collaborative and partnership with La Communida and the Hispanic American Institute. The committee

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determined that each of the six could be funded, resulting in awards totaling \$74,697.99.

Racing Division

See transcript pages 130 - 176

3:20 p.m.

The Commission determined to take the Racing Division matters first in order to accommodate interested parties who were waiting for this piece.

Suffolk Downs Racecourse Purse Request

Dr. Alexandra Lightbown, Director of Racing, with Chip Tuttle, COO of Suffolk Downs, and Bruce Barnett, Legal Counsel for Suffolk Downs presented Suffolk Downs' request that the entire portion of the Racehorse Development Fund allocated to thoroughbred purses (\$12 million) be given to Suffolk Downs for deposit into the Suffolk Downs purse account. Suffolk Downs stated that if the money could not be used for purses, Suffolk Downs would return the funds to the Commission.

Catherine Blue, General Counsel noted that this issue had been brought before the Commission a couple of weeks previously. There were several additional letters that were received on this issue which are included in the Commission packet. She stated that the issue before Commission was to determine what course of action to take when money is directed to be used for a particular purpose by statute, and that designated purpose does not occur. Ultimately, the statute requires that the money be used for purses, and there are not sufficient purses to use the amount of money that is available.

General Counsel Blue advised that the Commission could leave the money where it is until the need arises, or go to the legislature for guidance, which in fact the Commission has already done since it has held the money in the fund and has filed new legislation regarding the use of the fund, among other racing matters, each year over the last three years.

There was discussion around whether or not there was an event under the Commission's regulations that triggered the need for the money to go into escrow, and whether or not the regulation was valid under the statute. It was also discussed that there has to be a purse agreement.

The Commission requested assurance from Suffolk Downs that there will be races and a purse agreement in 2019. Suffolk Downs currently has no agreement for 2019.

Chairman Crosby stated the Commission has addressed this with the legislature previously, and the legislature has had several opportunities to solve this issue, but has not acted.

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[4:05 p.m.](#) *Commissioner Cameron moved to deny the request of Suffolk Downs Racecourse to transfer the Thoroughbred moneys into the Sterling Suffolk purse account. Commissioner Zuniga seconded.
Motion passed 4 – 1, with Chairman Crosby voting against the motion.*

Legal Division

See transcript pages 176 - 180

[4:07 p.m.](#) **Amendments to 101 and 115 et al.**
Catherine Blue presented the changes that define the standard of review for the hearing officer and the standard of review for the Commission. The changes previously requested by the Commission were made. Counsel Blue requested that the Commission approve these changes as well as the Small Business Impact Statement in order to begin the promulgation process.

[4:10 p.m.](#) *Commissioner Cameron moved that the Commission approve the Small Business Impact Statement for 205 CMR 101 for the adjudicatory proceedings, and 205 CMR 115 et al., which includes the technical updates to various regulations required by the amendments to 205 CMR 101 as included in the packet. Commissioner O'Brien seconded.
Motion passed 5 – 0.*

*Commissioner Cameron further moved that the Commission approve the version of 205 CMR 101, adjudicatory proceedings, and 205 CMR 115 et al., which includes the technical updates to various regulations required by the amendments 205 CMR 101 as included in the packet and authorize the staff to take all steps necessary to begin the regulatory promulgation process. Commissioner Zuniga seconded.
Motion passed 5 – 0.*

Commissioners' Updates

See transcript pages 180

[4:11 p.m.](#) The Commission commented on the status of the MGM Springfield project and its anticipated opening. It was noted that remarkable progress has been observed in just a number of months. The next few months are expected to be busy. It was remarked that a considerable amount of homage is being paid to the past and history of the City of Springfield in the architecture and construction.

[4:13 p.m.](#) *Having no further business, a motion to adjourn was made by Commissioner Zuniga. Commissioner Cameron seconded the motion.
Motion passed unanimously.*

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List of Documents and Other Items Used

1. Notice of Meeting and Agenda, dated April 26, 2018
2. Commission Meeting Minutes Draft dated April 12, 2018
3. MGM Springfield Presentation
4. Memo RE: Underage Persons on the Gaming Floor, dated April 26, 2018
5. MGM Springfield Gaming Area Map
6. MGM Springfield 2018 Gaming Establishment Map
7. MGM Local Business Plan Memo dated April 23, 2018
8. Expanding Access Grant MGC Memo dated April 20, 2018
9. 205 CMR 101.00 Draft Small Business Impact Statement
10. 205 CMR 101.00 Draft Regulation
11. 205 CMR 115.00 et al. Draft Small Business Impact Statement
12. 205 CMR 115.00 Draft Regulation
13. Suffolk Racecourse Purse Distribution Email & Document dated April 23, 2018
14. Letter to Chairman Crosby from NEHBPA dated April 19, 2018
15. Letter from B. Barnett to General Counsel Catherine Blue RE: SSR Request for RHDF Disbursement dated April 23, 2018
16. Letter from MA Thoroughbred Horsemen's Association RE: SSR Request

/s/ Catherine Blue
Assistant Secretary



TO: Chairman Crosby, Commissioners Cameron, O'Brien, Stebbins, and Zuniga

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

CC: Teresa Fiore, Program Manager

DATE: May 10, 2018

RE: Draft Massachusetts Responsible Gaming Framework, Version 2

Background

In 2013 the Massachusetts Gaming Commission (MGC) began a process to build a responsible gaming program that would meet, and even exceed, the stringent mandate set forth by the Expanded Gaming Act. The founding goals of the program aimed to mitigate the negative and unintended consequences of introducing casino gambling to the state. This process incorporated the advice and consultation of numerous industry experts, a review of international jurisdictional policy, and consideration of the body of relevant research. The summation of this work was drafted into the [Massachusetts Responsible Gaming Framework](#) (RGF) which the MGC formally adopted in 2014. The RGF is intended to inform gaming regulation in Massachusetts and provide an overall orientation to responsible gaming practice and policy adopted by the MGC and gaming licensees. Several important policies and innovative programs have been launched based on the strategies as outlined in the RGF:

- GameSense, the first on-site, responsible gaming program in the United States.
- Play My Way, a pioneering play management tool that allows patrons to set a daily, weekly, and/or monthly budget and receive real-time notifications as they approach it.
- The Voluntary Self Exclusion program, which allows individuals struggling with their gambling to exclude themselves from the gaming floor and remove themselves from gaming communication and promotional incentives. Program design is based on a uniquely patron-centered model intended to connect people with additional treatment and support resources.

The RGF strategies and tactics are intended to retain flexibility to respond to emerging evidence, evolving technology, and shifting sociocultural factors. In December 2016 the MGC agreed that it was time to review of the framework to identify gaps, expand the scope and consider the role it plays with other key partners.



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Process Used to Develop Version 2 of the Responsible Gaming Framework

In 2017, the MGC engaged Dr. Jeff Marotta of Problem Gambling Solutions, to help draft version 2 of the RGF. A workgroup including MGC staff, Commissioner Zuniga and the MA Council on Compulsive Gambling Executive Director, Marlene Warner worked with Dr. Marotta to execute a plan that included a literature review, key stakeholder input, public comment, international review of jurisdictional approaches and evaluation findings and consideration of our experience in Massachusetts. The summation of this work resulted in several important updates that are outlined below.

Overview of Revisions

I. Updated Key Principles and Concepts

- Introduced the concept of Positive Play and integrated concept throughout framework.
- Introduced the concept of a Stepped Care Approach as a guiding principle.
- Set expectation for Licensees to go beyond MGC responsible gaming required practices and to take a role to “innovate”.

II. Expanded Number of Responsible Gaming Strategies

- Added seventh strategy: “Commit to continuous improvement and reporting” to increase accountability.
 - Licensees are required to develop a Responsible Gaming Plan, create a Responsible Gaming Committee, and report findings to the MGC.

III. Updated Content within Strategies

- Updated terminology throughout document to reflect current nomenclature.
- Made numerous house-keeping revisions including corrections to spelling and grammar; updates to reflect changes in the MGC regulations and codes (“should” became “must” when referring to codified practices).
- Revised key terms to be consistent with those used in other MGC sponsored materials.
- Updated descriptions of tactics to describe current practices and how those practice may evolve with newly emerging evidence.
- Added language to address marketing casino through non-age restricted social gambling sites.
- Incorporated responsible gaming into digital gaming applications.
- Increased focus on promoting public health and safety by renaming strategy 3 from “Provide Protections with the Physical Environment” to “Promote Public Health and Safety within the Physical Environment” and expanded list of protections.
- Revised Strategy 4 to ensure responsible marketing better aligns with the new AGA codes while expanding upon AGA marketing guidelines.
- Revised Strategy 5 extensively by reorganizing tasks to fit MGC rules and expanding on debit card transaction protections.



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- Expanded Strategy 6 “Engage the Community” by differentiating between internal and external communities, and increased descriptive language as to important groups to collaborate with.
- Added the Public Participation Spectrum to Strategy 6. This model is intended to help guide the licensees engagement with the community at-large.

IV. Provided New Look and Feel to Document to Create Broader Appeal

- Updated format of the document to provide more contemporary look
- Expanded introduction to better position document as an information resource for various MGC stakeholders; designed primarily but not exclusively for Licensees.
- Streamlined document by removing appendixes and integrating information from appendixes into the body of the document.

V. Increased User Friendliness

- Restructured strategy descriptions to increase readability by adding introduction to each strategy and more logically presented strategy components.
- Provided hyperlinks to referenced documents.
- Added source endnotes to key terms and concepts.
- Added new section to provide background information taken from MGC sponsored research.
- Weaved relationship between RG practices and MGC research agenda throughout document, including a new section on Evaluating Responsible Gaming Initiatives.



Massachusetts Gaming Commission

RESPONSIBLE GAMING FRAMEWORK

VERSION 2.0 | MAY 2018



MISSION STATEMENT

The mission of the Massachusetts Gaming Commission is to create and maintain a fair, transparent, and participatory process for implementing the expanded gaming law passed by the Legislature and signed by the Governor in November, 2011.

The Commission strives to ensure that its decision-making and regulatory systems engender the confidence of the public and participants, and that they provide the greatest possible economic development benefits and revenues to the people of the Commonwealth, reduce to the maximum extent possible the potentially negative or unintended consequences of expanded gaming, and allow an appropriate return on investment for gaming providers that assures the operation of casino-resorts of the highest quality.





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INTRODUCTION

The Responsible Gaming Framework is intended to inform gambling regulation in Massachusetts and provide an overall orientation to responsible gaming practice and policy adopted by the Massachusetts Gaming Commission (MGC) and gaming licensees. The Framework is not designed to function as a regulation, but to guide the Commission's decisions as it promulgates regulation and develops programs and practices to support responsible gaming. The Responsible Gaming Framework is based on the commitment by the MGC and its gaming licensees to the guiding value of ethical and responsible behavior.

The Responsible Gaming Framework provides an approach through which gaming licensees can ensure their practices are consistent with the Commission's expectations that legalized gambling in the Commonwealth will be conducted in a manner to minimize harm.

The MGC Responsible Gaming Framework supports the implementation of the expanded gaming law ([Chapter 194 of the Acts of 2011, M.G.L. chapter 23K, or "the Gaming Act"](#)) of the Commonwealth of Massachusetts. The legislation includes a number of key mandates to ensure the successful implementation of expanded gaming, including protection for host and surrounding communities and the prevention and mitigation of social impacts and costs. For further information about Massachusetts' public health response to expanded gaming, view the [Strategic Plan: Services to Mitigate the Harms Associated with Gambling in Massachusetts](#).

Responsible Gaming

The provision of gambling services designed to encourage players to maintain their gambling at a healthy level and minimize harm to consumers and the community.¹

Problem Gambling

Difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community.²



GAMBLING BEHAVIOR IN MASSACHUSETTS

MGC has funded and will continue to fund [studies](#) to better understand the impact of expanded gaming in Massachusetts and to evaluate efforts to reduce gambling-related harm. Key study areas include, but are not limited to, public health impacts, economic impacts, and public safety impacts of expanded gaming.

One such study was the [Baseline General Population Survey](#), which was conducted to assess gambling behavior and problem gambling before any of the state's new casinos became operational. In late 2013 and early 2014, 9,578 Massachusetts residents responded to questions about their gambling behaviors over the previous 12-months. This study found:

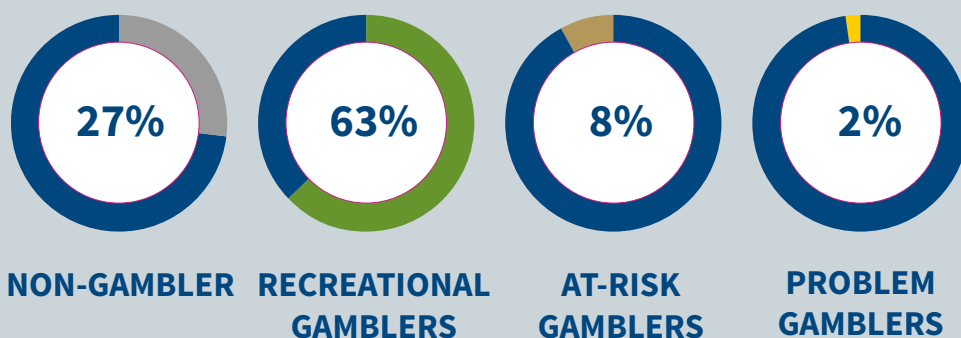
Of the Massachusetts population:



Of Massachusetts adults who do gamble, just under one quarter (**21.5%**) report visiting casinos to gamble.



The prevalence of problem gambling in Massachusetts is **2%** of the adult population with an additional **8%** of the population considered to be at-risk. Based on these percentages combined with July 1, 2017 U.S. Census estimates, it is estimated that 109,483 adult residents are problem gamblers, and 459,827 adult residents are at-risk gamblers.



There are significant differences in overall gambling participation associated with gender, age, race/ethnicity, education, employment, income level, and geographic region. Notably:

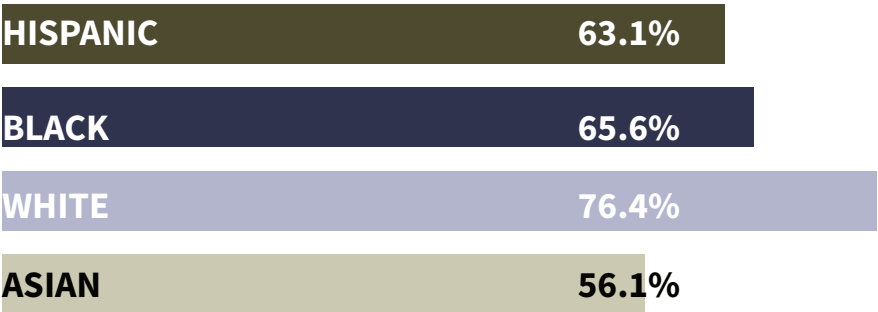
Men are more likely to gamble than women



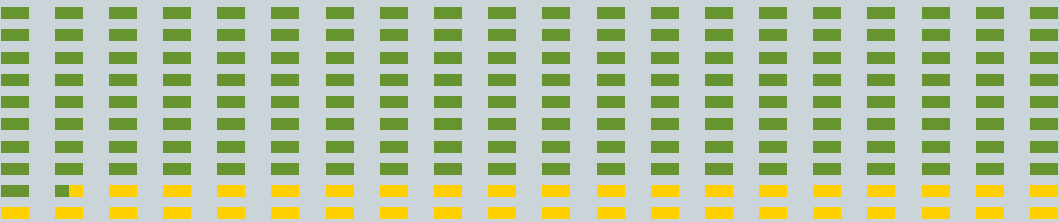
Adults between 25 and 64 are more likely to gamble than younger adults (18-24) or older adults (65+)



Whites are more likely to gamble than Hispanics, Blacks, or Asians



Nearly 2 in 10 Massachusetts adults (18.5%) reported knowing someone who they considered gambled too much.



In 2015, the first adult longitudinal cohort study of gambling and problem gambling was launched in Massachusetts. The following data highlights changes between Wave I (2013/2014) and Wave II (2015) of the cohort (n=3,096).

INCIDENCE:

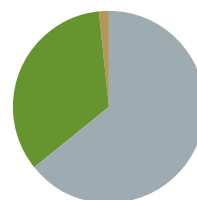
2% of the participants in the longitudinal cohort study developed a gambling problem between Wave I (2013/2014) and Wave II (2015).

TRANSITIONS, STABILITY, AND CHANGE:

The 2015 [MAGIC](#) study examined whether respondents moved from one risk category to another and, if so, whether they moved towards less severe or more severe problems.

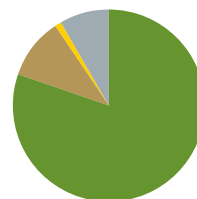
NON-GAMBLERS IN WAVE I

64.4% of remained in this category in Wave II.
34.1% moved into the Recreational Gambler category.
1.5% moved into the At-Risk Gambler category.*
0.0% moved into the Problem/Pathological Gambler category.



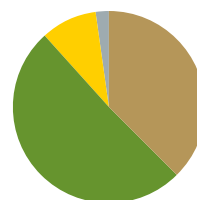
RECREATIONAL GAMBLERS IN WAVE I

80.3% of remained in this category in Wave II.
10.4% moved into the At Risk Gambler category.
1.0% moved into the Problem/Pathological Gambler category.
8.3% moved into the Non-Gambler category.



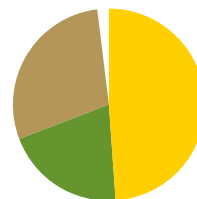
AT-RISK GAMBLERS IN WAVE I

37.5% remained in this category in Wave II.
50.9% moved into the Recreational Gambler category.
9.6% moved into the Problem/Pathological Gambler category.
2.0% moved into the Non-Gambler category.*



PROBLEM/PATHOLOGICAL GAMBLERS IN WAVE I

49.4% remained in this category in Wave II.
20.3% moved into the Recreational Gambling category.
29.1% moved into the At-Risk Gambler category.



*Indicates estimates are unreliable, relative standard error >30%



GUIDING VALUES AND APPROACH

The Responsible Gaming Framework is guided by the values expressed in the mission statement of the Massachusetts Gaming Commission:

The Massachusetts Gaming Commission will strive to ensure that its decision-making and regulatory systems engender the confidence of the public and participants, and that they provide the greatest possible economic development benefits and revenues to the people of the Commonwealth, reduce to the maximum extent possible the potentially negative or unintended consequences of the new legislation, and allow an appropriate return on investment for gaming providers that assures the operation of casino-resorts of the highest quality.

To this end, the MGC Responsible Gaming Framework aims to create an effective, sustainable, measurable, socially responsible, and accountable approach to gambling. This Responsible Gaming Framework is buttressed by MGC's annual research agenda. Information obtained from MGC-sponsored research guides the strategies and tactics described within this Responsible Gaming Framework.

The Responsible Gaming Framework has adopted an evidence-based approach to responsible gaming measures where sound research or evidence is available. Where evidence is lacking, uncertain, or ambiguous, and there is reasonable concern that gambling-related harm may occur, a precautionary approach has been applied. The precautionary approach rejects the notion that risks are acceptable until harm has been proven or that risks can continue unmitigated until the effectiveness of a harm minimization measure is proven. Responsible gaming measures will be evaluated and information from those evaluations will be used to continually improve responsible gaming practices and programs. Responsible gaming efforts in their entirety will retain flexibility to respond to emerging evidence, and the evolving technological and cultural environment.

The MGC Responsible Gaming Framework generally follows a stepped care approach towards harm prevention. This approach suggests the riskier or more problematic the playing behavior, the more focused the intervention needs to be, resulting in a hierarchy of potential interventions ranging from information provision to casino exclusion.

As gambling regulators, the MGC Responsible Gaming Framework's focus is on gaming licensees' practices. However, MGC believes gaming licensees do not have an isolated role in minimizing the potential harm of gambling. Government, science, industry, media, and gambling consumers must all take part to most effectively minimize harm caused or exacerbated by gambling.

Stepped Care Approach

The Responsible Gaming Framework is organized into seven broad strategies. To carry out these strategies, gaming licensees should apply a stepped care approach to maximize positive player outcomes. A stepped care approach recognizes that players differ from one another, as each player plays in a different manner, and, to differing degrees, is susceptible to harm. This means that there should be a hierarchy of potential interventions designed for different player groups, ranging from a focus on promoting positive play, to providing access to self-management tools and help resources, to offering casino exclusion.³



The Precautionary Approach

The current knowledge base regarding the effectiveness of responsible gaming interventions is limited. In this context, while an evidence-based approach is desirable, it is not always possible. Moreover, from a practical perspective, it will not always be desirable or possible for MGC to defer regulatory decisions until definitive evidence is available to support a particular intervention or technology. Under such circumstances, a precautionary approach is warranted.

Precautionary approach states that when an activity causes some threat or harm to the public or the environment, general precautionary measures should be taken. Lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent harm.^{4,5,6}

KEY POINTS

The precautionary approach:

- ‘gives primacy in policy debates to those upon whom the risk of harm is imposed’. It contrasts with approaches that prioritize the rights of those who would impose risks on others.
- ‘recognizes that the absence of full scientific certainty shall not be used as a reason for postponing decisions where there is a risk of serious or irreversible harm’.



GOAL AND OBJECTIVES

GOAL: To create an effective, sustainable, measurable, socially responsible, and accountable approach to gambling.

REGULATORY OBJECTIVES:

- Minimize the effects of gambling harm on individuals, families, and communities while serving the good of the Commonwealth and gaming licensees.
- Promote best and promising responsible gaming practices in all aspects of gaming licensee activities.
- Utilize principles of responsible gaming in introducing all new and emerging technologies.

RESEARCH OBJECTIVES:⁷

- Inform best practice in responsible gaming strategies and methods, problem gambling prevention and treatment, and responsible gaming messaging.
- Create and translate knowledge to support evidence-informed decision making about gambling policy and regulation.

EDUCATION OBJECTIVES:

- Provide accurate and balanced information to promote positive play.
- Provide patrons adversely affected by gambling with timely access and appropriate information on problem gambling; and counsel to where assistance in dealing with such matters can be obtained.
- Create a shared understanding of responsible gaming practices among individuals, communities, the gambling industry, and the government.

STRATEGIES

The Responsible Gaming Framework advises the gaming licensees to implement responsible gaming strategies, with a particular focus on prevention and player protection.

The Responsible Gaming Framework is organized into the following broad strategies:

- 1. Commit to corporate social responsibility**
- 2. Support positive play**
- 3. Promote public health and safety within the physical environment**
- 4. Ensure responsible marketing**
- 5. Manage high-risk financial transactions**
- 6. Engage the community**
- 7. Commit to continuous improvement and reporting**

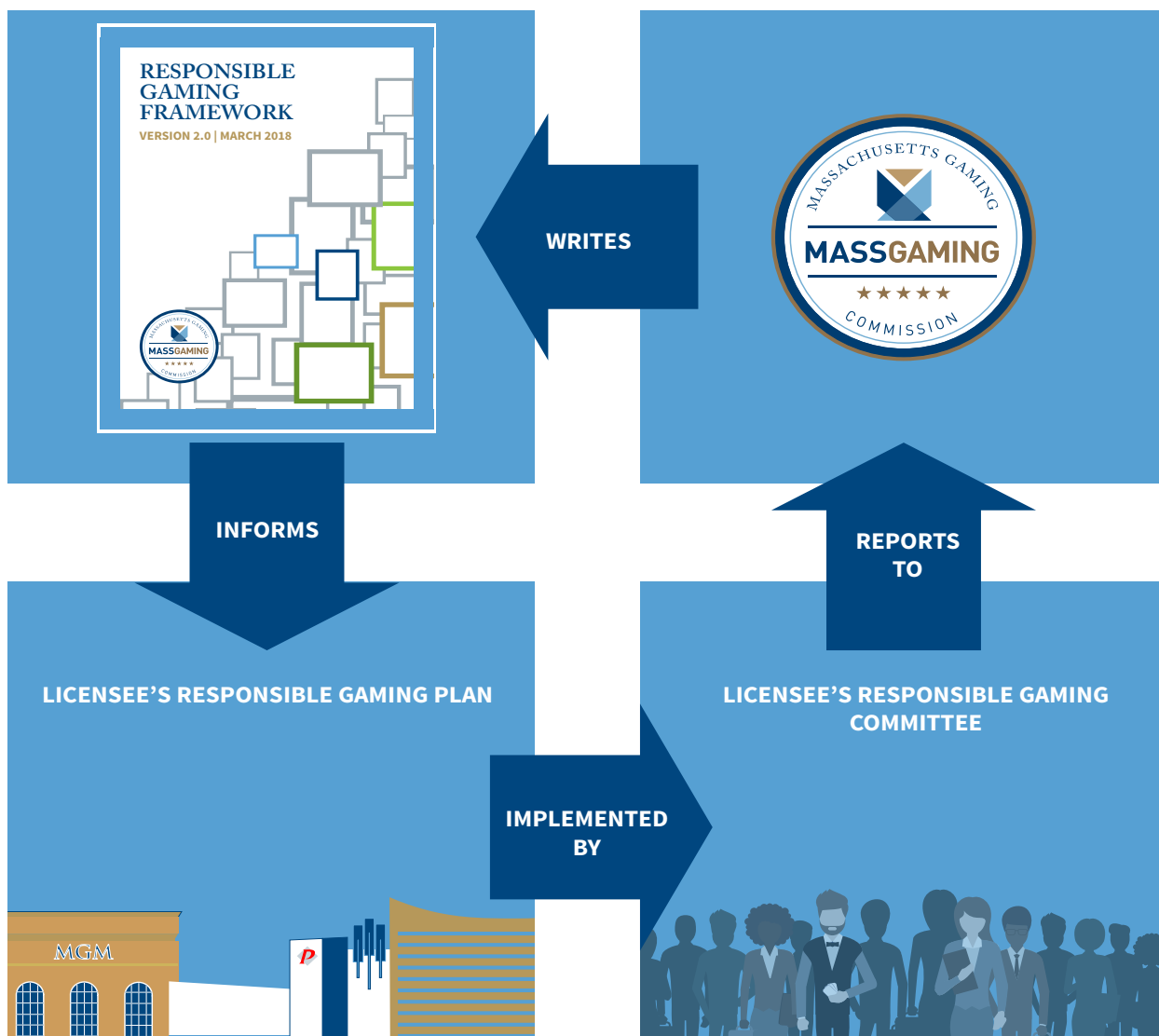
Each strategy contains a number of related practices. Gaming licensees are responsible for ensuring their commitment to the relevant practices and compliance with related regulations. The Responsible Gaming Framework strategies and practices will be monitored and evaluated regularly by MGC for effectiveness and fidelity. Where appropriate, policies and practices will be promulgated into regulation.

Responsible gaming strategies and practices will continue to evolve in response to innovation and new evidence related to problem gambling and responsible gaming. The MGC Responsible Gaming Framework strategies and practices will be periodically reviewed and revised.

STRATEGY 1 2 3 4 5 6 7

COMMIT TO CORPORATE SOCIAL RESPONSIBILITY

The aim of corporate social responsibility is to minimize the negative environmental and social impacts and maximize the positive impacts. Social responsibility, sustainability, consumer protection, cultural sensitivity, and product safety are central to public confidence and therefore need to constitute a core business approach driven from the top by strong corporate leadership, built into business purpose and strategy, and woven into the organization's culture. For gaming licensees, attention to responsible gaming broadly and the GameSense program specifically, is an important component of a larger commitment to corporate social responsibility. To demonstrate a commitment to promoting responsible gaming and addressing problem gambling, it's important that each gaming licensee include responsible gaming policies within their code of ethics, create a Responsible Gaming Committee, and implement a Responsible Gaming Plan.



1.1 RESPONSIBLE GAMING COMMITTEE

Each gaming licensee should establish a Responsible Gaming Committee comprised of members from leadership positions. Each licensee's Responsible Gaming Committee is responsible for continually improving their responsible gaming programs, maintaining compliance to the practices and policies described in their Responsible Gaming Plan and reporting their findings to MGC.

1.2 RESPONSIBLE GAMING PLAN

Each gaming licensee's Responsible Gaming Plan should reflect the strategies outlined in the MGC Responsible Gaming Framework and include detailed practices and procedures for assuring effective implementation of their Responsible Gaming Plan by conducting internal audits, surveying employees, and reviewing relevant data on a regular basis. Gaming licensee Responsible Gaming Plans should include commitments specific to licensee operations in order to:

- Provide ongoing education to employees about responsible gaming and their role in promoting a responsible gaming environment inclusive of the requirement that all employees participate in MGC-approved responsible gaming employee training programs.
- Reduce the risk of employee gambling-related problems through policies and practices inclusive of educational programs and resources for employees in need of assistance.
- Ensure that an appropriate level of awareness relating to responsible gaming is maintained throughout the licensed organization and key contractors, so that responsible gaming is made an integral part of daily operations.
- Provide employees with clear statements of expectations and responsibilities including an emphasis on the importance of employees in promoting responsible gaming and creating a healthy gambling environment.
- Designate responsible gaming duties for senior management and other leadership positions.
- Support and collaborate with on-site GameSense programs and initiatives.
- Adopt, implement, and maintain responsible gaming practices that are culturally and linguistically appropriate to staff and patrons.

STRATEGY 1 2 3 4 5 6 7

SUPPORT POSITIVE PLAY

The majority of casino patrons engage in ‘positive play’ or, in other words, exhibit no problems or concerns with their gambling. To help players to avoid persistent negative play experiences, efforts are in place to support continued positive play including programs that provide patrons with the information they need to make informed gambling decisions. This includes information on behaviors, attitudes, and motivations of players that show no signs of at-risk or problem gambling behavior as well as information about how games work. For persons who are unable to maintain positive play, gaming licensees must offer information about problem gambling and options for help. Programs to support positive play are expected to continually evolve as new information and technologies become available. Licensees and others have a role to innovate and assure programs and materials that support positive play and address problem play are woven into gaming establishment practices and policies.

Positive Play

Positive Play is when a player undertakes positive playing experiences and holds attitudes and beliefs that do not put them at risk for developing gambling problems. More specifically, this means only spending what is affordable to lose and sticking to personally allocated spend and time limits (formal or informal). Responsible play includes honesty and openness with self and others about personal gambling habits. Belief in luck or other superstitions may be present, but they do not have a significant negative impact on play. There is recognition that gambling will always involve some degree of chance.⁸

2.1 INFORMED DECISION-MAKING⁹

Informed decision-making requires that patrons have the information they need to make gambling decisions. The Informed Decision-Making framework, based on the stepped-care approach, specifies three separate information strategies aimed at three different primary gambler types:

- **Casual Gamblers** may benefit from programs that enhance their gambling literacy – i.e., how gambling works and low risk gambling guidelines.
- **Frequent Gamblers** may benefit from a deeper understanding of how gambling works, such as electronic gambling machines (EGMs) use of random number generators, probabilities and odds for table games, as well as information dispelling common gambling myths.
- **Intensive Gamblers** may benefit from information about their play activity, the use of self-assessment tools, and the options available for help.

If individuals move from casual, to frequent, to intensive gambling, these changes have important implications for information objectives, content, and delivery. The objective for the casual gambler is to promote basic gambling literacy, for the frequent gambler is to promote self-awareness of one's gambling, and for the intensive gambler is to provide cautionary information and raise awareness of options to reduce risk. Information guided by the Informed Decision-Making Framework should be made available through a variety of practices and methods including displaying materials throughout the gaming establishment, utilizing Play Information and Management Systems, and the accessibility to the GameSense Info Center.



2.2 PLAY INFORMATION AND MANAGEMENT SYSTEMS

Informed player choice is enhanced through the use of voluntary play information and management systems. The current system, branded as PlayMyWay, serves as a budgeting tool designed to give patrons the ability to monitor the amount of money they spend on electronic gambling machines, and to inform their decision to continue or stop play. The PlayMyWay tool is intended to help players make decisions about their gambling, allow them to monitor and understand their gambling behavior in real time, and provide information to support their choices. The current system enables players to voluntarily choose to set loss amounts that trigger simple pop-up reminders when they approach their pre-determined budget. Additionally, the current system provides players with access to daily, weekly, and monthly statements including the total bets, wins, and losses, tips on maintaining positive play, and information on how to access assistance. MGC utilizes third-party evaluation data to continually improve the system's effectiveness. As new information becomes available from evaluation efforts and research from the broader field, MGC will explore refining and adding system features such as enabling players with the option to compare their perceptions and beliefs about their gambling with information collected by the system to display the actual time they played, their actual wins and losses, and how their wins and losses compare to system-wide player group averages.



2.3 GAMESENSE INFO CENTER

Each gaming establishment is required to provide a GameSense Info Center to serve as an on-site responsible gaming resource staffed by third-party vendors contracted through MGC. To receive maximum visibility, each establishment's GameSense Info Center is located near a high traffic gambling area of the casino to serve as the patrons' central point of contact for information about programs to support positive play. Programs include: Information about play management tools and enrollment assistance, educational tools to provide personalized feedback, materials on low risk gambling guidelines, and information on how games work. The GameSense Info Center also serves as a primary location to obtain information on resources and programs to assist players and their family members for when gambling becomes a problem. Individuals can learn about and enroll in voluntary self-exclusion programs at the GameSense Info Center. GameSense Advisors will be available during peak hours and individuals will have access to a phone where they can call the 24-hour Massachusetts Problem Gambling Helpline (1.800.426.1234).



2.4 VOLUNTARY SELF-EXCLUSION

As required by statute, Voluntary Self-Exclusion programs are available to assist patrons who recognize that they have experienced a loss of control over their gambling and wish to invoke external controls. Licensees will inform the public and make available to patrons different forms of Voluntary Self-Exclusion, including:

- Exclusion from marketing lists, including licensee's social casino sites
- Exclusion from receiving house-credit and/or check cashing privileges
- Physical exclusion from MGC-licensed gambling venues statewide

Additionally, MGC will investigate the feasibility, and effectiveness of offering patrons the ability to exclude themselves from ATM usage located on gaming license property and participation in regional casino exclusion programs.

The Self-Exclusion process utilizes an engaged approach, ensuring that the patron obtains the assistance needed, is responded to in a respectful, timely, and discreet manner, and feels supported. Licensees will put mechanisms and procedures in place to support an engaged approach during all aspects of the self-exclusion service, including enrollment, enforcement, and assisting individuals that attempt or break their agreement. Gambling wins and losses by banned individuals will be transferred to the MGC Gaming Revenue Fund.

Individuals utilizing the Voluntary Self-Exclusion program will select the duration of their self-exclusion. 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 participating in a reinstatement session. During this brief session, the following topics will be covered: safe gambling tips, risks of gambling, and referrals to additional help, as appropriate.

OPT-OUT

STRATEGY 1 2 3 4 5 6 7

PROMOTE PUBLIC HEALTH AND SAFETY WITHIN THE PHYSICAL ENVIRONMENT

Gaming licensees' commitment to corporate social responsibility extends beyond what is traditionally thought of as responsible gaming provisions to broader daily operations designed to promote public health and safety. The majority of the below listed protections are codified into state law and are provided here to demonstrate the scope of measures taken to provide public protections within the physical environments managed by gaming licensees.

3.1 PREVENT UNDERAGE GAMBLING

Gaming licensees shall implement policies and practices designed to prevent legally underage persons from participating in any gambling at casinos, loitering in the gambling area of a casino or betting area of a racetrack, or from gaining access to online, mobile, or in-room gambling opportunities. Gaming licensees should take all reasonable steps to ensure that staff understands their responsibilities in preventing underage gambling. Gambling wins and losses by underage persons will be transferred to the MGC Gaming Revenue Fund.



3.2 PROVIDE PROTECTIONS AGAINST CHILD AND ELDER NEGLECT OR ABANDONMENT

Licensees shall establish policies and practices to safeguard children and dependent elderly from neglect or abandonment by patrons including:

- Discourage patrons from bringing dependents within close proximity to the gambling floor.
- Increase patron awareness of policies and practices designed to protect children and dependent elderly.
- Place signage in parking areas explicitly disallowing unattended dependents in vehicles.
- Monitor premises and motor vehicles parked within Licensee's grounds.
- Clearly indicate to patrons and staff those areas within the property where minors are not allowed.
- If aware of a patron violating child or elder endangerment laws while gambling at their facility, the Licensee should notify local law authorities and consider banning the patron from the property.

3.3 CREATE SMOKE-FREE AND VAPE-FREE ENVIRONMENTS

To protect all employees and patrons from exposure to the harmful chemicals and drugs contained in secondhand smoke and e-cigarette aerosol, gaming licensees should enforce the state law that prohibits smoking in all enclosed areas of the gaming establishment, and prohibit the use of e-cigarettes in accordance with local regulation.

3.4 SERVE ALCOHOLIC BEVERAGES RESPONSIBLY

Gaming licensees will observe a responsible beverage service policy, including making a diligent effort to:

- Ensure that appropriate casino employees are trained in the company's responsible alcoholic beverage service policy and provide periodic refresher training to those employees
- Not serve alcoholic beverages to a minor
- Not serve alcoholic beverages to an intoxicated patron
- Not permit casino gambling by an intoxicated patron
- Escort intoxicated persons from the gambling area
- Prohibit the distribution of alcoholic beverages during hours determined by MGC

3.5 ASSIST PATRONS IN NEED

Gaming licensees should develop patron assistance policies and practices to appropriately identify, understand, and respond to patrons asking for assistance, exhibiting behaviors disruptive to others, displaying emotional distress, or showing symptoms of fatigue or medical needs. Patron assistance programs should be designed to collaborate with onsite resources, when appropriate, to offer aid to any patron in need with emphasis placed on developing training, procedures, and evaluation methods for assisting:

- Persons showing clear signs of distress connected to a problem with their gambling
- Individuals threatening harm to themselves or others
- Persons displaying irrational behavior or speech
- Suspected victims of human trafficking

3.6 INCORPORATE RESPONSIBLE GAMING FEATURES INTO INTERNET AND MOBILE GAMBLING APPLICATIONS

As technology evolves and new tools and methods are developed that utilizes internet and mobile devices, gaming licensees should ensure that responsible gaming features are considered in the design, development, and delivery of gambling products and services, including:

- As gambling and gaming are converging in different ways, gaming licensees are encouraged to regularly consult with experts to discuss strategies for minimizing harms associated with any new or existing internet and mobile gambling and gaming products.
- Practice games should include information about responsible and problem gambling, be clearly labelled as for adult use only, and should not be advertised in a way that is appealing to youth.

3.7 ENCOURAGE BREAKS IN PLAY

To encourage breaks in play, gaming licensees should consider the following measures:

- Display clocks in prominent locations in the gambling area to help patrons track the passage of time
- Offer amenities, including hospitality services and non-gambling forms of entertainment in areas on and off the gaming floor
- Encourage patrons to visit the GameSense Info Center
- Train employees on when and how to encourage patrons to take breaks in play
- Provide lounge or seating areas other than those provided in retail and gambling settings



3.8 ENFORCE THIRD-PARTY EXCLUSIONS

In an effort to protect individuals who manifest a severe gambling disorder and are unable or unwilling to exclude themselves from an MGC-licensed gaming facility, third-party exclusions will be made available. Gaming licensees will enforce the exclusion of individuals who are banned from gambling establishments by an entity other than the excluded individual.

STRATEGY 1 2 3 **4** 5 6 7

ENSURE RESPONSIBLE MARKETING

Gaming licensees should develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner. This includes advertising is sensitive to concerns about youth exposure to gambling promotion, including casino marketing on non-age restricted social casino apps or online free-play sites. An important aspect of responsible marketing is including messaging related to promoting positive play and advertising problem gambling help resources. Several actions will help accomplish this, including:

- Integrating responsible gaming messaging into casino marketing materials
- Participating in Responsible Gaming Education Week and Problem Gambling Awareness Month
- Coordinating responsible gaming marketing efforts with MGC and other entities promoting MGC-sanctioned responsible gaming awareness efforts

As a minimum standard for gaming licensee advertising and marketing, the below guidelines, adapted from the American Gaming Association's Code of Conduct for Responsible Gaming, should be followed.

For the purposes of this strategy, advertising and marketing includes, among other media, radio and television, print ads, direct mail, social media, billboards, and internet promotions.

4.1 ADVERTISING AND MARKETING CONSIDERATIONS

Gambling advertising and marketing should:

- Contain a responsible gaming message and/or a toll-free help line number where practical
- Reflect generally accepted contemporary standards of good taste
- Make no false or misleading claims or suggest that the actual likelihood of winning or losing at the various games offered by the casino are different than those actually experienced

4.2 ADVERTISING AND MARKETING PROHIBITIONS

Gambling advertising and marketing should not:

- Contain images, symbols, cartoon figures, celebrity/entertainer endorsements and/or language directed to or intended to appeal specifically to persons below the legal age
- Feature anyone who is or appears to be below the legal age to participate in gambling activity
- Be placed unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable up-to-date audience composition data
- Be promoted on college or university campuses or in college or university publications.
- Be placed on billboards or other outdoor displays that are adjacent to schools or other primarily youth-oriented locations
- Contain claims or representations that gambling activity will guarantee an individual's social, financial, or personal success
- Imply or suggest any illegal activity of any kind
- Encourage people to play beyond their means
- Exaggerate the chances of winning
- Encourage excessive or irresponsible play

STRATEGY 1 2 3 4 **5** 6 7

MANAGE HIGH-RISK FINANCIAL TRANSACTIONS

To reduce the risk of players spending more on gambling activities than they can afford, gaming licensees will take several measures to manage high-risk financial transactions. These include developing policies that ensure all legal, statutory, and regulatory requirements relating to financial transactions are implemented. Particular attention should be paid to the following:

5.1 HOUSE CREDIT

Gambling on borrowed money is considered a high-risk practice that necessitates consumer protections. The following safeguards are intended to assure that risks associated with issuing house credit are minimized:

- Credit worthiness of an applicant will be verified using MGC regulations.
- House credit will only be extended to patrons who qualify for a minimum \$10,000 threshold and will not exceed the amount requested by the patron.
- Credit applications will include an MGC-approved problem gambling self-assessment.
- Credit officers will obtain verbal verification from credit applicants that they are comfortable losing up to the amount of credit requested and granted.
- House credit will not be offered to persons who self-identify as a person with a gambling problem, or place themselves on a voluntary credit suspension list.
- A temporary credit increase for a patron's single trip to the casino is restricted to 25% and limited to once every 30 days.
- Credit requests, including extensions, may not be accepted from patrons who are visibly intoxicated or exhibiting behaviors suggestive of impaired mental competence.



5.2 CASH AND CREDIT TRANSACTIONS

For many players, limiting access to cash on the gambling floor is an important strategy in supporting positive play. For patrons whose play has become problematic, preventing high risk cash and credit transactions to fund gambling is paramount in reducing personal financial harm. In addition to the below measures to manage high-risk financial transactions, MGC and gaming licensees will continue to explore technological solutions and innovative practices to prevent high risk transactions.

- Using credit cards to finance gambling results in high fees and interest rates charged by credit card institutions and may lead to serious debt problems. For these reasons, credit card transactions are not allowed for the purposes of gambling.
- To restrict access to cash while gambling, debit card transactions are not permitted to be initiated within 15 feet of the gambling area.
- Cashless gaming systems must follow current Gaming Laboratories International (GLI) standards and obtain MGC approval. Until determined to be safe by MGC, “Smart Card” technology and other cashless gaming systems enabling players to transfer money from a bank account to their player reward card, for the purpose of gambling, are not allowed.
- Gaming licensees are encouraged to participate in any ATM exclusion program available from its ATM or other financial service providers that offers gamblers a way to block access to cash across ATMs within the gaming establishment, cash access kiosks, and booth services. If the ATM provider offers such program, ATM exclusion authorization forms should be widely available, including at the GameSense Info Centers and player service locations.
- Gaming licensees must develop and implement a system of internal controls relative to the acceptance of checks presented by patrons for gambling purposes. These controls must comply with MGC regulations that prohibit cashing government-issued checks or third party checks other than bank issued cashier’s checks or traveler’s checks.
- For payout wins where federal taxes must be reported, written information should be made available alerting patrons of the association between large wins and problem gambling.

STRATEGY 1 2 3 4 5 6 7

ENGAGE THE COMMUNITY

Community engagement is an important feature of corporate social responsibility. Engaging the community is a way to understand, participate in and act upon critical workplace, marketplace, and environmental issues. Gaming licensees should connect at all possible levels from within their organization to integrate within host and neighboring communities' governing bodies, economic, social, and environmental life. Efforts should be focused on building collaborations and partnerships with individuals and entities addressing problem gambling and health promotion.

6.1 ENGAGING COMMUNITIES WITHIN THE GAMING ESTABLISHMENT

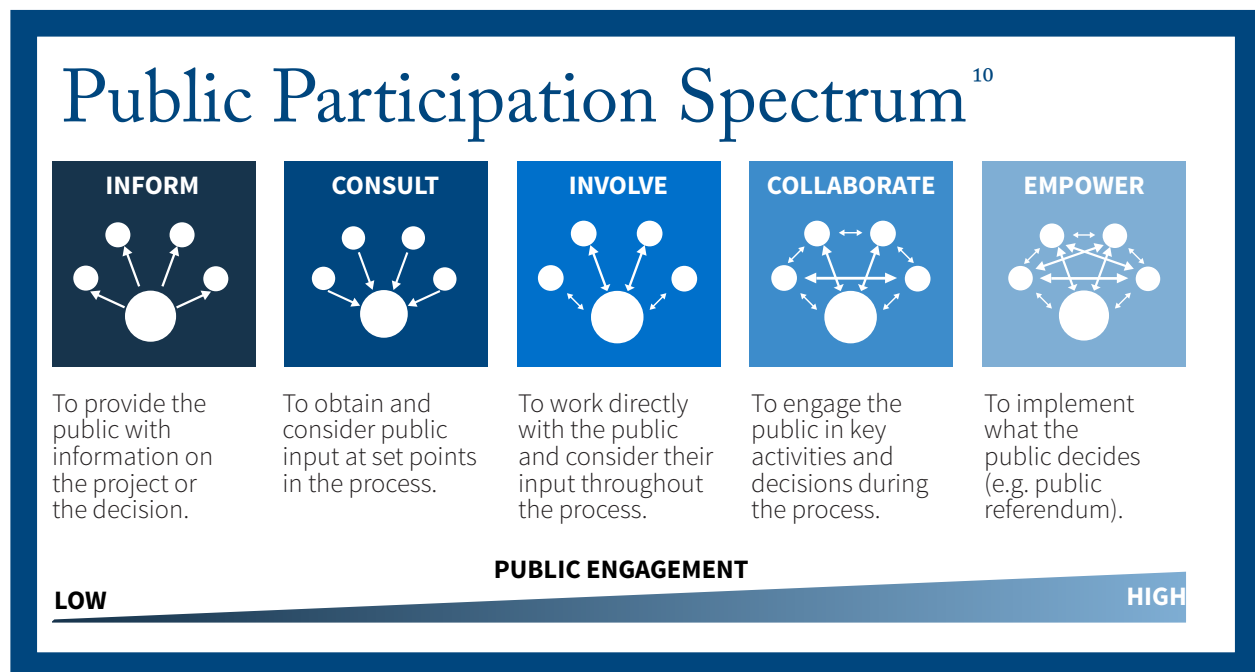
It is recommended that gaming licensees develop practices and programs to engage individuals and entities directly involved with the gaming establishment to innovate, educate, problem solve, and improve relationships. These include:

- Establishment of policies and practices to gather patron comments and to respond to patron complaints
- Providing opportunities for employees to anonymously voice relevant concerns or questions
- Designation of easy to access space within the casino property for a GameSense Info Center. Within the GameSense Info Center, gaming licensees will designate an office for private meetings between patrons with concerns related to their gambling and counselors or other staff trained in crisis intervention, mental health triage, and the facilitation of a self-exclusion process
- Public education about how gambling machines work including differences between gambling machines, how their play options impact payout rates, and explaining features of newly introduced games
- Active engagement with MGC-funded researchers to facilitate access to needed information and enhance the exchange of information between evaluators and gaming licensees

6.2 AT-LARGE COMMUNITY ENGAGEMENT

Partnerships and collaborations are based on shared responsibilities. For gaming licensees to do their part, they should utilize findings from MGC-sponsored research to inform their efforts to actively engage the community, promote broad-based citizen participation in addressing concerns, and strengthen community relationships. Gaming licensees are encouraged to utilize the Public Participation Spectrum, a model for community engagement to measure optimal level for public participation goals. Activities consistent with the Public Participation Spectrum include:

- Regular engagement with the Massachusetts Council on Compulsive Gambling, the Massachusetts Partnership on Responsible Gambling, and other entities interested in issues related to problem gambling and responsible gaming
- Utilization of findings from MGC-sponsored research and Massachusetts Department of Public Health-funded problem gambling prevention and treatment programs to inform ethical and responsible practices
- Responding to community requests for participation with events and representative inclusion in coalitions, boards, or other community organizations
- Collaborative work with the academic community to better understand the positive and negative impact of practices and policies through information exchange, including providing researchers access to employees, patrons, and data bases
- Engagement in outreach activities aimed at developing relationships with relevant host and surrounding community organizations that provide problem gambling treatment and problem gambling prevention activities



STRATEGY 1 2 3 4 5 6 7

COMMIT TO CONTINUOUS IMPROVEMENT AND REPORTING

All gaming licensees are responsible for continually improving their responsible gaming strategies and practices and reporting on their accomplishments. To meet these objectives gaming licensees will:

- Maintain appropriate records relating to the practices in the Responsible Gaming Framework
- Provide responsible gaming related updates to MGC partners, as requested
- Submit an annual Responsible Gaming Plan progress report according to MGC standards
- Participate and cooperate with MGC-sponsored responsible gaming program evaluation research
- Fully engage in responsible gaming program reviews conducted or sponsored by MGC
- Utilize evaluation and review findings to strengthen responsible gaming practices

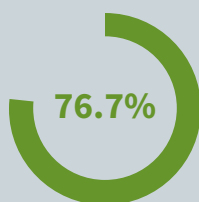


EVALUATION OF RESPONSIBLE GAMING INITIATIVES

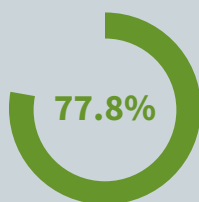
The Massachusetts Gaming Commission has contracted with the Division on Addiction, Cambridge Health Alliance, to provide evaluation of three MGC responsible gaming initiatives as outlined in **STRATEGY 2: SUPPORT POSITIVE PLAY**. Findings from these evaluations are used to refine and update the initiatives to ensure the highest reasonable level of efficacy. MGC considers evaluations to be essential to good program health and for this reason will fund evaluations on regular basis. The full evaluations which are referenced below can be accessed on the [MGC Research Agenda](#) webpage.

GAMESENSE

The GameSense program at Plainridge Park Casino was available to casino guests at the time of the casino's grand opening in June 2015. While key program objectives have remained the same, program managers noted that there was a period of adjustment during the first six months which has leveled out as GameSense Advisors have refined their roles to be as effective as possible. The GameSense program has undergone multiple waves of evaluation with various data collection methodologies which ranged from an electronic checklist used by GameSense Advisors, GameSense Info Center visitor surveys, general casino patron surveys, and casino staff surveys. Some key findings from the [GameSense Evaluation](#) report include:



GameSense Info Center survey respondents who reported that, by visiting GameSense, they learned strategies about how to keep gambling fun.



GameSense Info Center survey respondents who reported that their visit to GameSense enhanced their overall visit to Plainridge Park Casino.



GameSense Info Center survey respondents who reported that they would visit GameSense again.

PLAYMYWAY

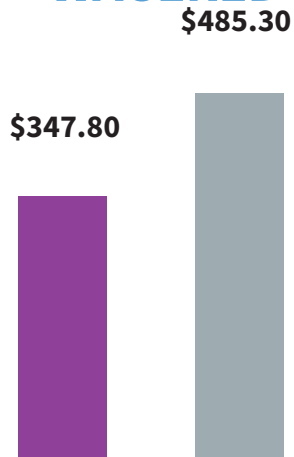
PlayMyWay was launched in June of 2016 to help players make decisions about gambling, allow them to monitor and understand their playing behavior in real time, and support their decisions. [The First Year Analysis](#) of the program found that:



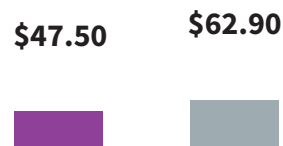
Of the 101,024 Plainridge Park Casino visitors who were eligible to enroll in the program during the study period, **8.8%** (8,856) enrolled in PlayMyWay.

PlayMyWay users tended to wager less money as well as lose less money per day compared to non-users. Whereas the median PlayMyWay-user wagered \$347.80 and lost \$47.50 per day, their non-user counterparts wagered \$485.30 and lost \$62.90.

MEDIAN PER DAY WAGERED



MEDIAN PER DAY LOST



PLAYMYWAY USERS



PLAYMYWAY NON-USERS

VOLUNTARY SELF-EXCLUSION

The Voluntary Self-Exclusion Program was launched just before the opening of Plainridge Park Casino in June 2015. Data collection consisted of an optional questionnaire that was included as part of the Voluntary Self-Exclusion form. Additionally, newly enrolled individuals were given the chance to participate in two more detailed surveys that were administered telephonically by researchers.

Key findings of the Preliminary Evaluation of the Massachusetts Voluntary Self-Exclusion Program include:



When casino patrons enroll in the Voluntary Self-Exclusion Program they are offered an opportunity to review a resource packet containing information where they can get help. Almost all of the enrollees (97%) elected to review the resource packet with the enrolling agent.



88% of Voluntary Self-Exclusion Program enrollees who participated in the study reported that they had a better experience with the Massachusetts program than they did with other jurisdictions or states.



Enrollees who participated in the study experienced significant problems with their gambling and well-being upon enrollment. Six months after enrollment, their reported gambling problems declined and their reported well-being improved.

ACKNOWLEDGMENTS

The development of the Massachusetts Gaming Commission Responsible Gaming Framework consisted of an extensive research process involving the review of a broad range of academic articles and studies, policy papers, investigative reports, jurisdictional reviews, corporate reporting documents, and legislation relating to gambling issues in Massachusetts, other United States jurisdictions, and abroad. From this review, materials produced by the following entities most notably informed the Framework:

- American Gaming Association
- Australian Gaming Council
- Australian Government Productivity Commission
- British Columbia Lottery Corporation
- Gambling Research Exchange of Ontario
- Netherlands Ministry of Security and Justice
- New Zealand Department of Internal Affairs
- New Zealand Ministry of Health
- Nova Scotia Government (multiple agencies)
- Massachusetts Department of Public Health
- Ontario Responsible Gambling Council
- Queensland Government Office of Liquor and Gaming Regulation
- Responsible Gambling Strategy Board
- United Kingdom Gambling Commission

Scholarly papers of notable significance to the development of the Framework include:

- Blaszczynski, A., Collins, P., Fong, D., Ladouceur, R., Nower, L., Shaffer, H. J., & Venisse, J. L. (2011). Responsible gambling: General principles and minimal requirements. *Journal of Gambling Studies*, 27(4), 565-573.
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UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Lottery Revenue and Plainridge Park Casino: Analysis After Two Years of Casino Operation

April 26, 2018

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University of Massachusetts Donahue Institute, Economic and Public Policy Research Group

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Executive Summary

Background

The slot parlor at Plainridge Park opened in Plainville, Massachusetts on June 24, 2015. Two additional casinos are scheduled to open in Everett and Springfield and are currently under construction. With the introduction of casino gambling in Massachusetts, the Commonwealth has made protection of the lottery a priority. The Legislature required all prospective casino operators to be a licensed state lottery agent.

In fiscal year 2017, total lottery sales in Massachusetts were just over \$5.0 billion, a decrease of approximately 2.6% compared to fiscal year 2016 when sales were a record-high \$5.2 billion. Lottery revenues are the largest source of unrestricted local aid in Massachusetts and the second largest source of all local aid, after Chapter 70 education aid. Local aid is distributed from a single pool according to a formula devised by the Legislature; local sales do not determine the amount of local aid that a municipality receives. In fiscal year 2017, the lottery's net profit was a \$1.039 billion, an all-time record high, of which \$958 million was distributed to the Commonwealth's municipalities in the form of direct local aid. In fiscal year 2017, Plainville received \$729,447 from the lottery and other direct local aid sources, which represents 16.6% of the town's total state aid and 2.0% of total receipts.

Casino tax revenue will also contribute to local aid, with 82% of tax revenue from Plainridge Park Casino allocated to local aid. The Category 1 casinos scheduled to open in Everett and Springfield will contribute 20% of tax revenue to local aid. As of December 2017, a total of \$199,948,775 has been collected in state taxes and race horse assessments, of which \$163,223,490 consists of state taxes.¹

Methods

The Massachusetts Lottery has provided fiscal year and agent-specific lottery sales data to the SEIGMA Economics team at the UMass Donahue Institute. Fiscal year data dates from 2003 to 2017. Agent-specific lottery revenue dates from June 2014 to July 2017. Changes in revenue are analyzed at several levels, including statewide, in the host and designated surrounding communities near the casino, for agents at different driving distances from the casino, and for communities and regions most represented in the patron survey data. Plainville is the host community and Attleboro, North Attleborough, Foxborough, Mansfield, and Wrentham are the officially designated surrounding communities.

Key Findings

- No large, significant decline in lottery revenue can be attributed to Plainridge Park Casino.
- No obvious pattern between lottery sales growth and proximity to the casino was detected. Sales have not uniformly increased at greater distances from the casino.
- In the first year after the opening of Plainridge Park Casino, lottery revenue in Plainville increased approximately 25%. It has remained at that level in the second year of operation.
- Sales for other agents in Plainville have not notably declined since the opening of Plainridge Park casino.
- Compared to the year prior to the casino opening, gains in lottery revenue in Plainville have been sufficient to offset declines in the surrounding communities, leaving sales essentially unchanged, but not matching gains in rest of the state.

¹ <https://massgaming.com/wp-content/uploads/Revenue-Report-12-2017.pdf>

- Over the two year period since the opening of the casino, changes in average bi-weekly sales for agents in the surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham vary, but collectively decline compared to the year prior to the casino opening.
- Over the two-year period since the opening of the casino, average bi-weekly sales in Plainville and the surrounding communities combined are essentially unchanged compared to the year prior to opening.
- Relative to the rest of the state, lottery sales for agents within a 15-minute drive of Plainridge Park Casino grew more slowly (year 1) or decreased (year 2) compared to the year prior to the casino opening.
- Relative to the rest of the state, lottery sales for agents within a 16-30 minute drive of Plainridge Park Casino grew more rapidly compared to the year prior to the casino opening.
- Massachusetts is one of the largest lotteries in the country, both in per capita terms and in absolute terms. As late as fiscal year 2012 and 2013, lottery revenue in Massachusetts exceeded lottery revenue in Florida and California, respectively.
- Growth in lottery revenue in Massachusetts has been slower than growth in lottery revenue nationwide and in other New England states.
- Lottery sales in Massachusetts in fiscal year 2017 decreased 2.6% over fiscal year 2016 (a record sales year), when sales increased 4.3% over fiscal year 2015.
- Between fiscal year 2003 and fiscal year 2017, lottery revenue has grown at an annualized rate of 1.38%. Inflation over the same period has grown at an annualized rate of 2.04%.
- In Plainville and the surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham, lottery revenue grew more slowly in fiscal year 2016 than the state wide average (2.1% vs. 4.3%) and decreased more in fiscal year 2017 (-3.8% vs. -2.6%).
- With the exception of the Berkshires region, sales growth in the Metro Boston and Southeast Region (the source of 85% of recaptured gambling dollars) lagged behind other regions in the state in the two years following the opening of the casino.

Discussion

Statewide lottery revenue grew 4.3% in fiscal year 2016, a time period that nearly corresponds to the first full year of operation of Plainridge Park Casino, which opened June 24, 2015. In fiscal year 2016, lottery sales established an all-time sales record. In fiscal year 2017, however, statewide lottery revenue declined 2.6%. Lottery sales for the city of Plainville increased 25% in the year after the casino opened relative to the prior year and remained at that level in the second year. This increase is due to increased lottery sales at Plainridge Park Casino.

Sales for lottery agents in the surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham, *combined*, did not decline in the first year following the opening of the new casino, but grew more slowly, increasing 3.6% over the year prior to the casino opening compared to 5.2% for lottery sales statewide. In the second year of operation, sales in the *combined* surrounding communities decreased by 1.5% relative to the year prior to the casino opening compared to a 2.8% increase statewide relative to the base period prior to the casino opening. Even when including Plainridge Park Casino, sales for agents within a 15-minute drive of the casino follow a similar pattern, growing more slowly in the first year (3.78%) and decreasing (0.37%) in the second year. However, it should also be noted that sales for agents within a 16-30 minute drive of the casino performed better than the state as a whole, increasing in both years following the opening of the casino, by 5.70% in year 1 and 3.12% in year 2 compared to the year prior to opening.

Overall, the gains in lottery revenue in Plainville have been sufficient to offset declines in the surrounding and nearby communities, but not enough to match gains in the rest of the state over the two year period since the opening of Plainridge Park Casino. However, the difference is not statistically significant and it is not possible to conclude any directional change in lottery revenues. In other words, statistically, lottery sales in the host and nearby communities (designated surrounding communities and those within a 15-minute drive) remain unchanged.

Introduction

The Massachusetts State Lottery has been operating since 1972. In fiscal year 2017, lottery tickets could be purchased at over 8,000 licensed lottery vendors throughout the Commonwealth and total sales were just over \$5.0 billion, a decrease of approximately 2.6% compared to fiscal year 2016 when sales were a record-high \$5.2 billion. For fiscal year 2017, instant games accounted for nearly 70% of lottery sales. Keno, the next most popular game, contributed approximately 18% of total sales in fiscal year 2017.

With the introduction of expanded gambling in Massachusetts, the Commonwealth has made the protection of the Lottery and its vendors a priority. Chapter 23K, Section 1 of the 2011 Expanded Gaming Act states that “enhancing and supporting the performance of the state lottery and continuing the commonwealth’s dedication to local aid is imperative to the policy objectives of this chapter.”² Section 4 gives the newly created Massachusetts Gaming Commission the power to “coordinate with the office of the treasurer and receiver general on implementing any measures necessary to protect the commonwealth’s lottery and gaming interests.”

The Legislature also placed conditions on all prospective casino operators, aimed at protecting the Lottery. Section 15 (1) of the Expanded Gaming Act states that any applicant for a gaming license must “agree to be a licensed state lottery sales agent under chapter 10 to sell or operate the lottery, multi-jurisdictional and keno games; demonstrate that the lottery and keno games shall be readily accessible to the guests of the gaming establishment and agree that, as a condition of its license to operate a gaming establishment, it will not create, promote, operate or sell games that are similar to or in direct competition, as determined by the commission, with games offered by the state lottery commission, including the lottery instant games or its lotto style games such as keno or its multi-jurisdictional games.” Section 15 (6) requires any applicant to “demonstrate to the commission how the applicant proposes to address lottery mitigation.”

The lottery is a major source of revenue for the Commonwealth and in particular for its 351 cities and towns. Lottery revenues are the largest source of unrestricted local aid in Massachusetts and the second largest source of all local aid, after Chapter 70 education aid. Revenue from Massachusetts lottery sales are combined and distributed by the state legislature to municipalities, along with other funds collected for unrestricted local aid, according to a formula which takes into account the incomes, property wealth, and population of each municipality. Since most revenue for municipal governments comes from property taxes, many communities in Massachusetts without substantial property wealth rely on this source of aid to fund their local government services.

In fiscal year 2017, the lottery’s net profit increased compared to fiscal year 2016, reaching an all-time record of \$1.039 billion, of which \$958 million was distributed to the Commonwealth’s municipalities in the form of direct local aid.³ The significance of these funds varies across communities based on the magnitude of their other sources of revenue – from 0.03% of total receipts in Chilmark to 14.5% in

² The Expanded Gaming Act can be found at <https://malegislature.gov/Laws/SessionLaws/Acts/2011/Chapter194>.

³ Funds also go to the Massachusetts Arts Lottery, the Massachusetts Cultural Council, and the Massachusetts Council on Compulsive Gambling. See <http://www.masslottery.com/about/communities/> for detail.

Adams. As reported on the Lottery website, among the casino host communities, Everett received \$6,642,634 from the lottery in fiscal year 2017, 8.8% of Everett's total state aid and 3.1% of its total receipts, while Plainville received \$729,447 (16.6% of the town's total state aid and 2.0% of total receipts) and Springfield received \$36,399,631 (9.7% of total state aid and 5.8% of total receipts).⁴

As Massachusetts moves forward with the introduction of casino gambling, one priority of the Massachusetts Gaming Commission and the SEIGMA project is to determine how lottery-product-buying behavior may be affected by the introduction of casino gambling in Massachusetts. Studies have been conducted on the impacts of expanded gambling on lottery revenue in other states, but it is difficult to say how similar the impacts will be in Massachusetts. In 2016, at \$767, Massachusetts has the highest per capita lottery sales in the nation amongst states without video lottery terminals (VLTs), with the next highest non-VLT state being Georgia at \$412 per capita).⁵ This may be in part because of the odds offered by the Massachusetts Lottery. According to the U.S. Census' 2015 Annual Survey of State Government (the most current as of the time of writing), for every dollar spent on the lottery in Massachusetts, 73 cents are paid out to players, the most of any state (approximately the same proportion as Arizona) and considerably higher than the U.S. average of 63 cents. The relative popularity of the Massachusetts Lottery, to some extent, may insulate it from potential negative impacts as casino gambling continues to expand. Yet, the lottery's prominent role in Massachusetts also means that the consequences of a reallocation of spending towards the casinos and away from the lottery are potentially greater.

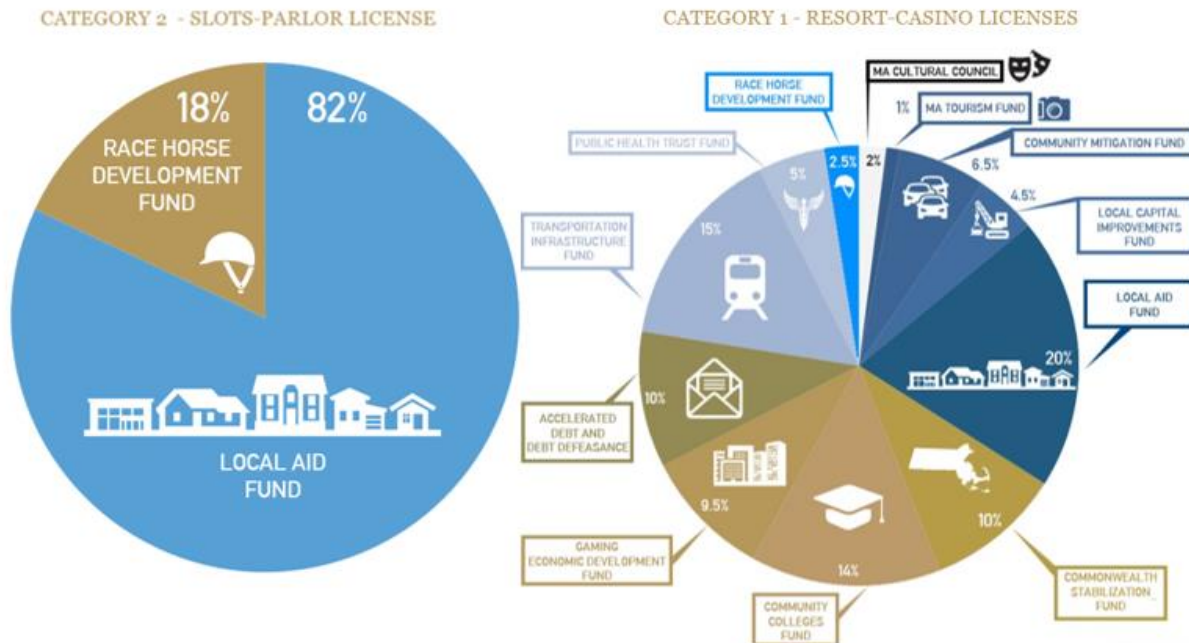
In the event that the expansion of casino gambling in Massachusetts leads individuals to spend less money on lottery and more money at the casinos, this will not necessarily lead to a reduction in local aid funds. As detailed in Figure 1 below, the Category 2 slots parlor that opened in Plainville in the summer of 2015 allocates 82% of its tax revenue to local aid, while the Category 1 resort casinos will allocate 20% of their tax revenue to local aid when they open.⁶ Thus the net impact on local aid will depend on changes in both casino and lottery revenue. In order to determine the impact of expanded gambling on Massachusetts, monitoring of lottery performance, statewide and in the communities near the new casinos, is a priority of the SEIGMA team. With the context of its significance to the Commonwealth in mind, this report details the work that the SEIGMA team has done to date to monitor the impact of expanded gambling on the Massachusetts Lottery.

⁴ Data on State lottery disbursements comes from the Massachusetts Lottery and can be found at <http://www.masslottery.com/about/communities/complete-list.html>. Data on state aid and total receipts for Massachusetts communities comes from the Massachusetts Department of Revenue, Division of Local Services and can be found at <http://www.mass.gov/dor/local-officials/municipal-databank-and-local-aid-unit/data-bank-reports/municipal-budgeted-revenues.html>.

⁵ La Fleur's 2017 World Lottery Almanac. In 2016, only Rhode Island had higher per capita sales of \$829, but nearly 65% of lottery revenue in Rhode Island is generated by VLTs (<http://rilot.com/financial.asp>). Other than Rhode Island, no other state, including those with VLTs, had higher per capita sales than Massachusetts.

⁶ From the Massachusetts Gaming Commission. More information can be found at <http://massgaming.com/the-commission/budget/>

Figure 1: Allocation of Tax Revenue for Category 1 and 2 Casinos



Source: The Massachusetts Gaming Commission.

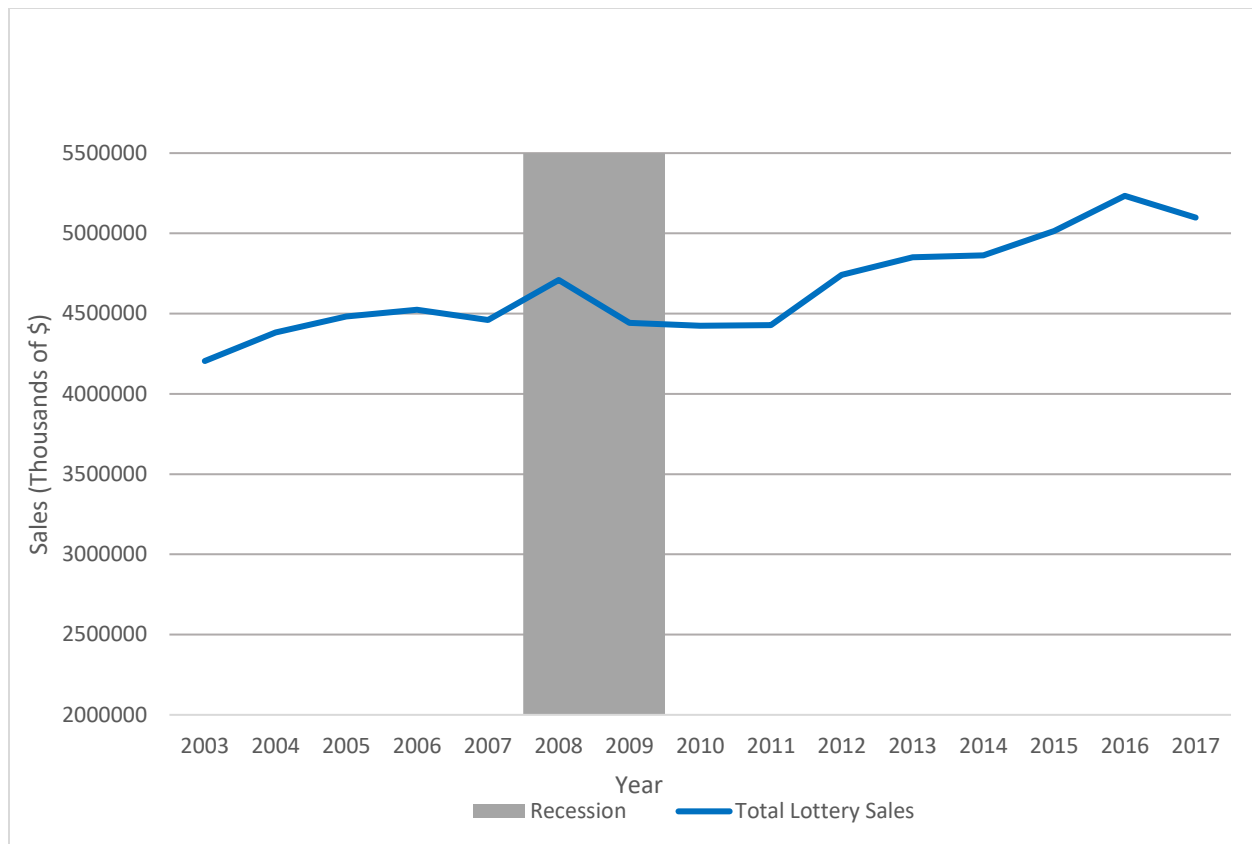
Massachusetts Lottery Sales 2003-2017

Statewide Sales

Lottery sales in Massachusetts over the 2003-2017 fiscal year period have generally grown slowly, but steadily (see Figure 2). Average annual sales growth over this period is 1.38%.⁷ Like many state lotteries, sales during the recession flattened or decreased. Beginning in 2012 sales growth increased, but in fiscal year 2017, year-over-year lottery sales decreased by approximately 2.6%.

⁷ Sales are in nominal dollars and not adjusted for inflation, which averaged 2.04% over the sample period. In inflation adjusted dollars, revenue for fiscal year 2017 was approximately the same as revenue for fiscal year 2008 and is below revenue for fiscal year 2003. In inflation adjusted dollars, the annualized growth rate from 2003-2017 was -0.64%. See Appendix A, Figure A-1, for inflation-adjusted (real dollar) lottery sales.

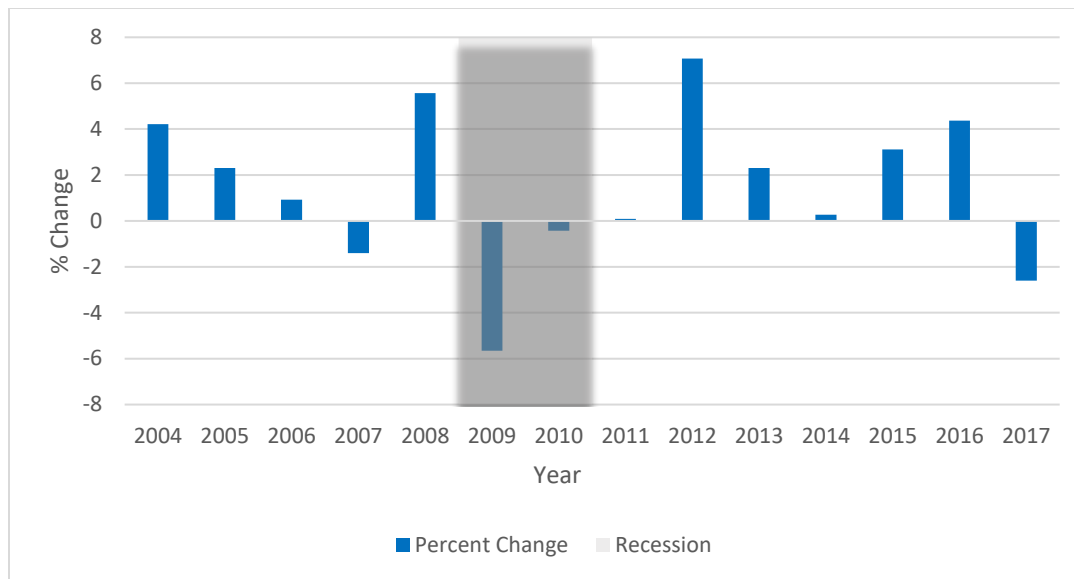
Figure 2: MA Lottery Sales, FY 2003-2017, Not Adjusted for Inflation



Source: MA Lottery, FY 2003-2017, nominal dollars. Lottery revenues declined during the recession, increased between 2012 and 2016, but declined in 2017. The average annual growth in nominal lottery revenue between 2003 and 2017 was 1.38%

Figure 3 presents the annual percentage change in lottery revenues between 2004 and 2017 in more detail (see Appendix A for annual percentage changes of inflation-adjusted dollars). Massachusetts lottery sales decreased 5.5% between 2008 and 2009, followed by several years of little to no growth. In 2012, sales growth increased over 7%, followed by two years of slower growth before rebounding again in fiscal years 2015 and 2016. Sales in fiscal year 2017 decreased by 2.6%. Figure 3 also demonstrates the year-to-year variation that occurs in lottery revenue growth, even in non-recession years, reinforcing the prudence in not placing too much emphasis on a single year of increased or decreased revenue.

Figure 3: Percent Change in Lottery Sales, FY 2003-2017

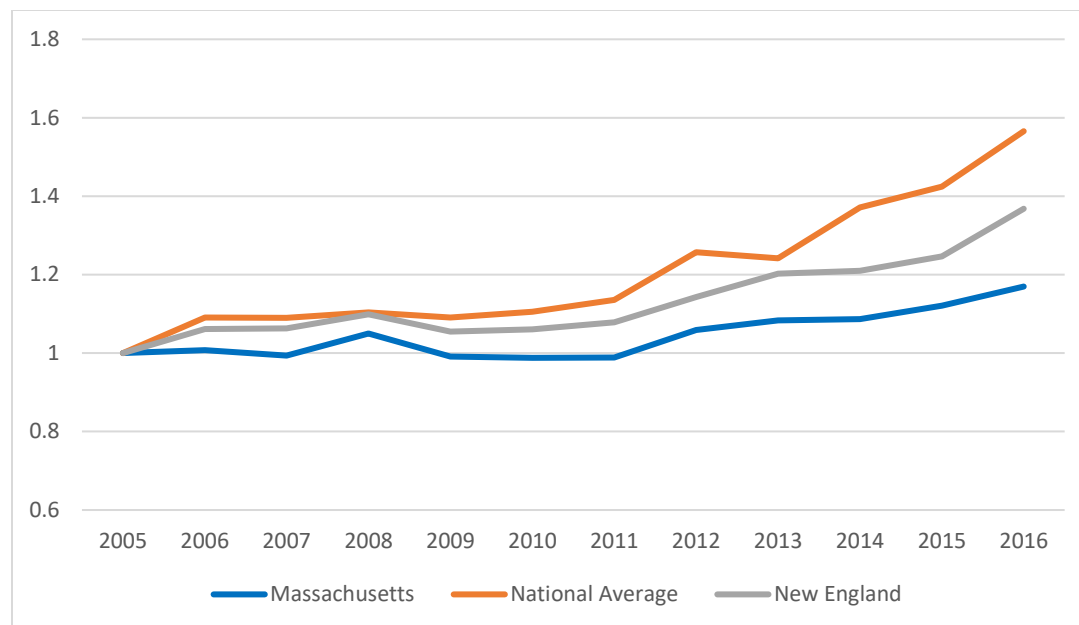


Source: MA Lottery, FY 2003-2017, nominal dollars. This figure shows annual growth rates. The declines in revenue during the recession are evident. Since the recession, the increase in lottery revenue was greatest in 2012 and 2016.

Massachusetts Lottery Sales by Region and Relative to Other States

Figure 4 shows fiscal year lottery sales for Massachusetts relative to other states in the US and New England for the period from 2005-2016 (see Appendix A for lottery sales adjusted for inflation over the period). All sales are relative to sales in fiscal year 2005. Only states that had lotteries in existence since 2005 and states without VLTs are included. VLTs are a different product more similar to slot machines than traditional lottery games that comprise the Massachusetts Lottery. For this reason, New England states in Figure 4 are represented by Maine, Vermont, New Hampshire, and Connecticut. Rhode Island, which has VLTs, is excluded.

Figure 4: Relative Lottery Sales, Massachusetts, National Average, and New England, FY 2005-2017

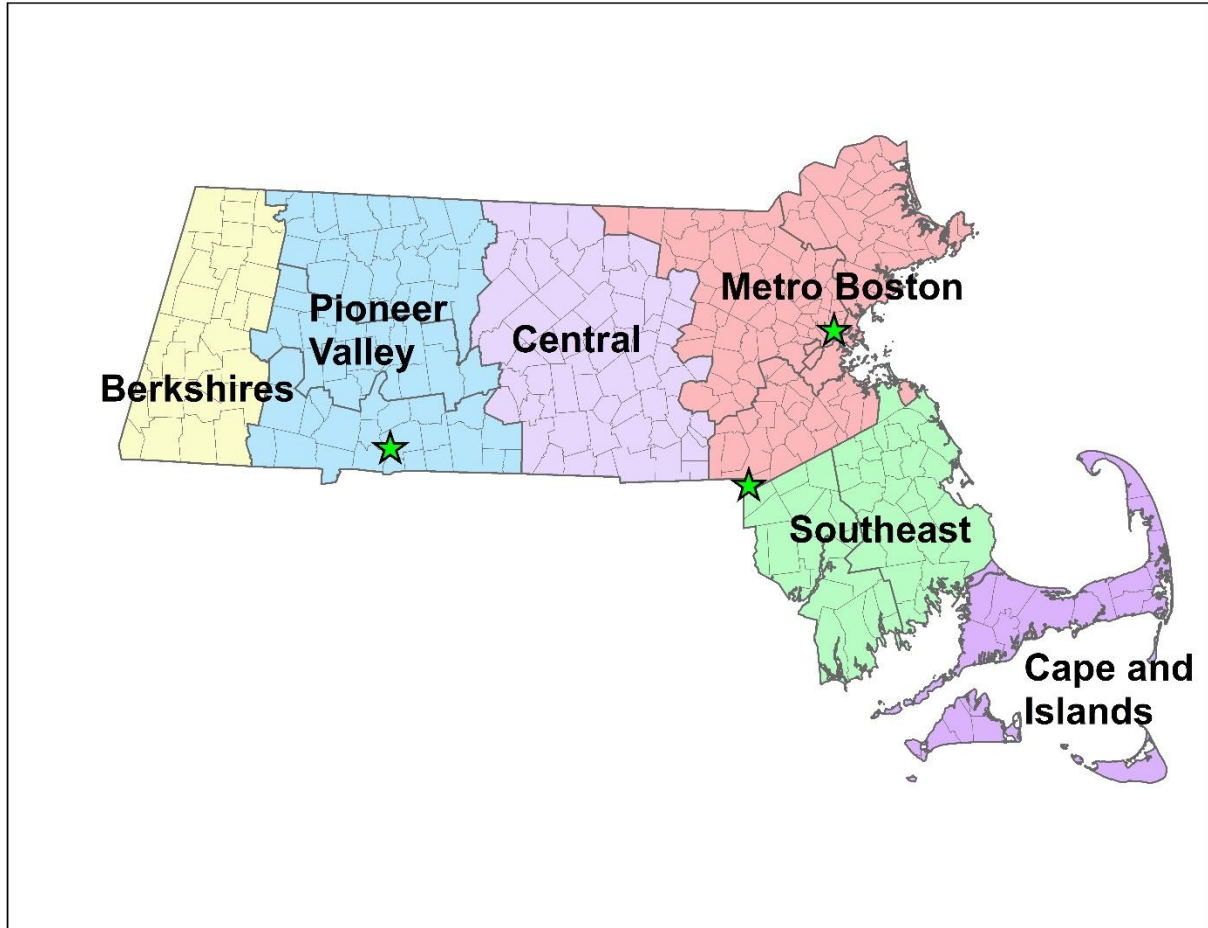


Source: LaFleur's World Lottery Almanac, 2005-2017. Sales relative to sales in 2005 (2005=1). States recover following recession. Growth in Massachusetts less than national average and other New England states.

Figure 4 demonstrates that sales in other states have recovered and grown faster than Massachusetts since fiscal year 2012. The exact reasons for this are not clear, but it should be noted that states with the fastest growth include Arizona, California, and Florida. These states have experienced significant population growth, including a growing retirement population. However, growth in Massachusetts has also lagged behind the other New England states, although the gap is less pronounced. In real terms (see Appendix A, Figure A3), lottery revenue in Massachusetts has yet to surpass the level of sales in fiscal year 2005. Finally, it should be noted that while revenue growth in Massachusetts has lagged the nation as a whole and other New England states, the Massachusetts Lottery is one of the largest in the nation in terms of total sales, not just per capita sales. As late as fiscal years 2012 and 2013, total annual sales in Massachusetts exceeded those in Florida and California. So, while sales growth has been slow to recover, the lottery is still one of the largest and most mature in the nation, both in per capita and absolute terms.

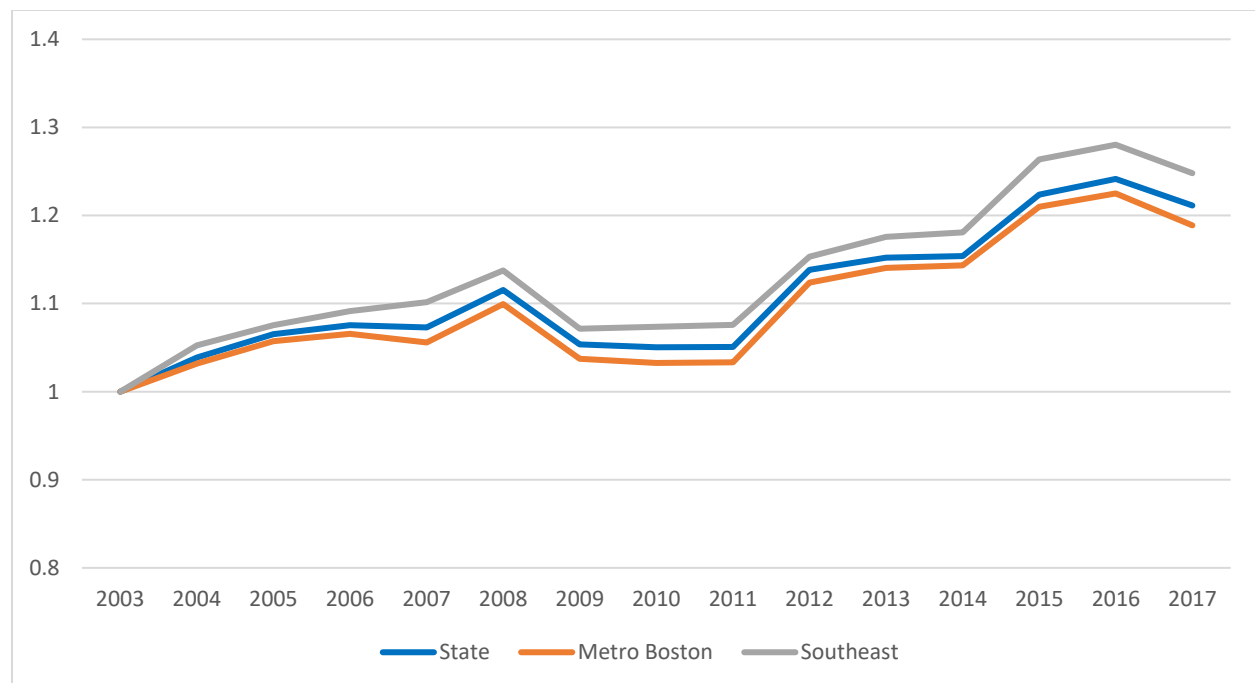
The *Patron and License Plate Survey Report: Plainridge Park Casino 2016* (Salame et al., 2017) estimates that nearly 85% of the recaptured gambling dollars (dollars that would have been spent gambling outside of the state) at Plainridge Park Casino came from the Metro Boston and Southeast regions. Consequently, we examine lottery sales in these regions. Other regions are also explored for comparison. Figure 5 shows a map of the regions.

Figure 5: Map of the Regions used in the Patron Survey and Operations Reports



Lottery sales for fiscal years 2003 to 2017 for the entire state and for the Southeast (Bristol and Plymouth counties) and Metro Boston (Essex, Middlesex, Norfolk, and Suffolk counties) regions are presented in Figure 6. The Southeast and Metro Boston regions have experienced growth in the lottery similar to the state as a whole. Lottery revenue in the Southeast region has grown slightly faster than the state as a whole (averaging approximately 1.6% over the entire period versus approximately 1.4% for the state as a whole), whereas growth in Metro Boston, at approximately 1.3%, has been slightly below the state average. Both the Southeast and Metro Boston region experienced an increase in sales in fiscal year 2016, the first year after the opening of Plainridge Park Casino, and a decrease in sales in fiscal year 2017, the second year after the casino opening, mirroring the performance of the state as a whole.

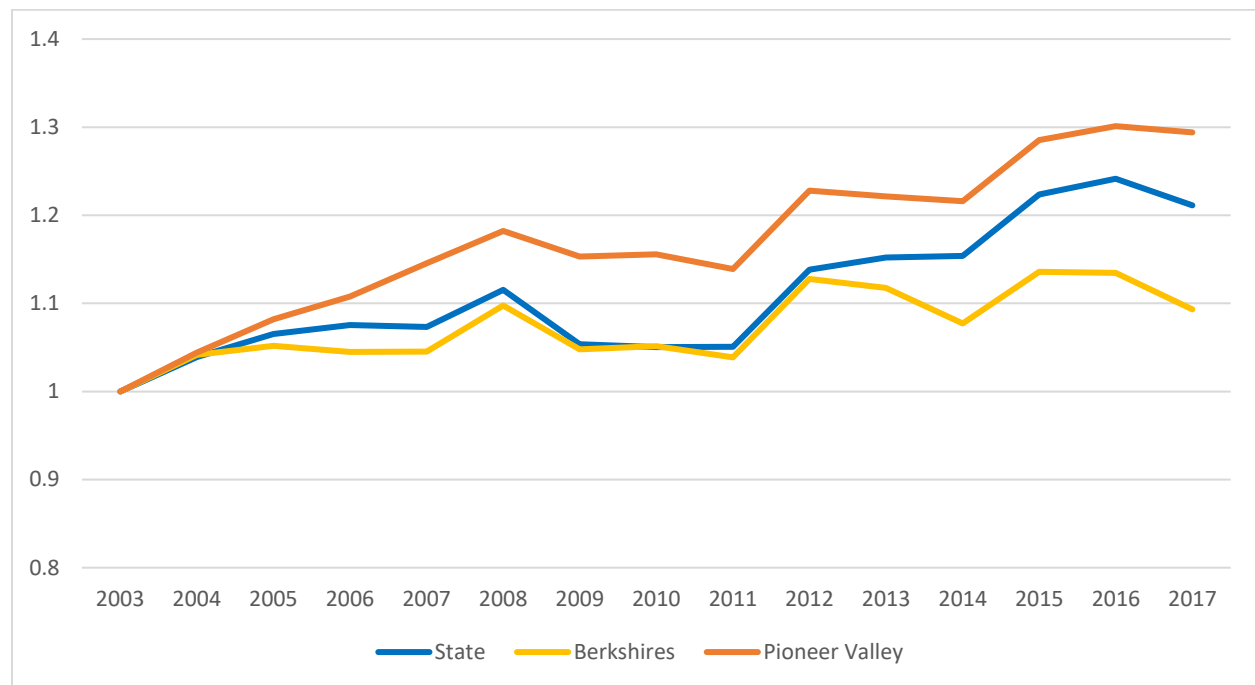
Figure 6: Relative Lottery Sales, Massachusetts, Metro Boston Region, and Southeast Region, FY 2003-2017



Source: MA Lottery, FY 2003-2017, nominal dollars. Sales are relative to sales in 2003 (2003=1). This figure shows relative lottery sales for Massachusetts and the Southeast and Metro Boston regions, the regions where the majority of visitors to Plainridge Park Casino originated.

Lottery sales for the Pioneer Valley region (Franklin, Hampden, and Hampshire Counties) and the Berkshires region (Berkshire County) are presented in Figure 7. The performance of these two regions is notably different over the period. Lottery sales in the Pioneer Valley region have grown faster than the state as a whole, averaging nearly 1.9% over the period. Only the Cape and Islands region performed better, growing approximately 2% over the period. Moreover, while sales declined during the recession of 2008 and 2009, the decline in the Pioneer Valley was less pronounced. The growth of lottery revenue in the Berkshires region, in contrast, has been below the state average. This is most pronounced beginning in fiscal years 2013 and 2014, where growth in lottery revenues in the Berkshires region declined compared to modest increases in the state as a whole. Revenue growth in the Berkshires region over the 2003-2017 period averages approximately 0.7%.

Figure 7: Relative Lottery Sales, Massachusetts, Pioneer Valley Region, and Berkshires Region, FY 2003-2017



Source: MA Lottery, FY 2003-2017, nominal dollars. Sales are relative to sales in 2003 (2003=1). This figure shows relative lottery sales for Massachusetts and the Pioneer Valley and Berkshires regions. Lottery revenue in the Pioneer Valley grew faster than the state as a whole, whereas the Berkshires region grew more slowly, particularly beginning in fiscal year 2013.

In summary, lottery revenue in Massachusetts has generally grown slowly since 2003. On average, this growth has been below the rate of inflation, resulting in a decrease in real or inflation-adjusted lottery revenue. Lottery sales in fiscal year 2016, the first fiscal year following the opening of Plainridge Park Casino, increased approximately 4.3% compared to the prior year. Sales in fiscal year 2017, however, declined approximately 2.6% compared to fiscal year 2016. Lottery revenue growth in the Metro Boston and Southeast regions has mirrored the variability in sales for the state as a whole, with the Southeast region growing slightly faster and Metro Boston slightly slower than the state as a whole. The Berkshires region has generally performed worse than the state as a whole, whereas the Pioneer Valley region, which will host a casino in Springfield in the near future, has outperformed the state as a whole.

The above analysis provided a broader statewide and regional comparison of lottery sales over time in Massachusetts and compared sales in Massachusetts relative to the national and New England average. We now turn our attention to areas near Plainridge Park Casino using both fiscal year sales and agent-specific weekly sales.

Massachusetts Lottery Sales Near Plainridge Park Casino

Plainville and Surrounding Region Sales: Fiscal Year Revenue Analysis

Following the methodology used for analyzing the first year of casino operation, we take a two-pronged approach to analyzing post-casino lottery revenue with a pre-casino baseline. First, we compare fiscal year revenue for the years prior to the casino opening (2003-2015) with two years of fiscal year revenue data after the casino opening. Fiscal years 2016 and 2017 represent two years of post-casino revenue since Plainridge Park Casino opened June 24, 2015. Second, we use agent-specific data to compare sales for the year prior to Plainridge Park Casino opening with sales after opening. These comparisons are made for Plainville, for the Massachusetts Gaming Commission's (MGC) designated surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham (see Figure 8), for agents within varying drive time distances of Plainridge Park Casino, for cities most represented in the patron survey, and for the regions illustrated in Figure 5. Sales before and after the opening of Plainridge Park Casino for all of these areas are compared with changes in sales over the same period in the rest of the state.

Figure 8: Plainville and MGC-designated Surrounding Communities

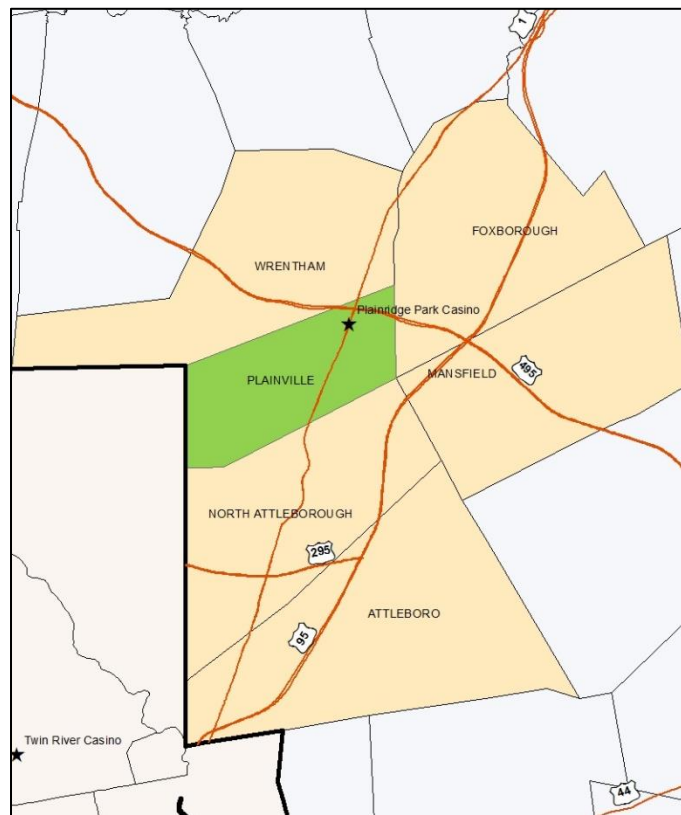
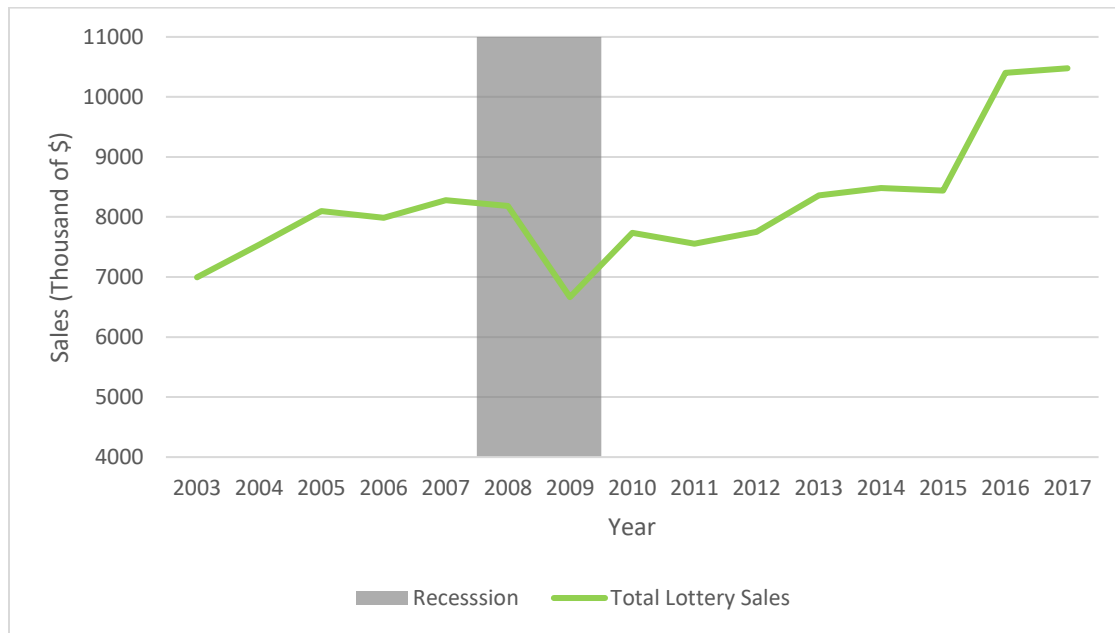


Figure 9 illustrates total lottery sales in the town of Plainville for fiscal years 2003-2017. Sales in Plainville, in general, followed the pattern experienced by the state prior to Plainridge Park Casino opening. However, sales growth in fiscal year 2016, the first year after the opening of Plainridge Park Casino, was 23.2% over fiscal year 2015 sales. As will be made clear below, this is due primarily to the

increase in lottery sales at Plainridge Park Casino. In fiscal year 2017, sales growth in Plainville was approximately 0.7% over fiscal year 2016.

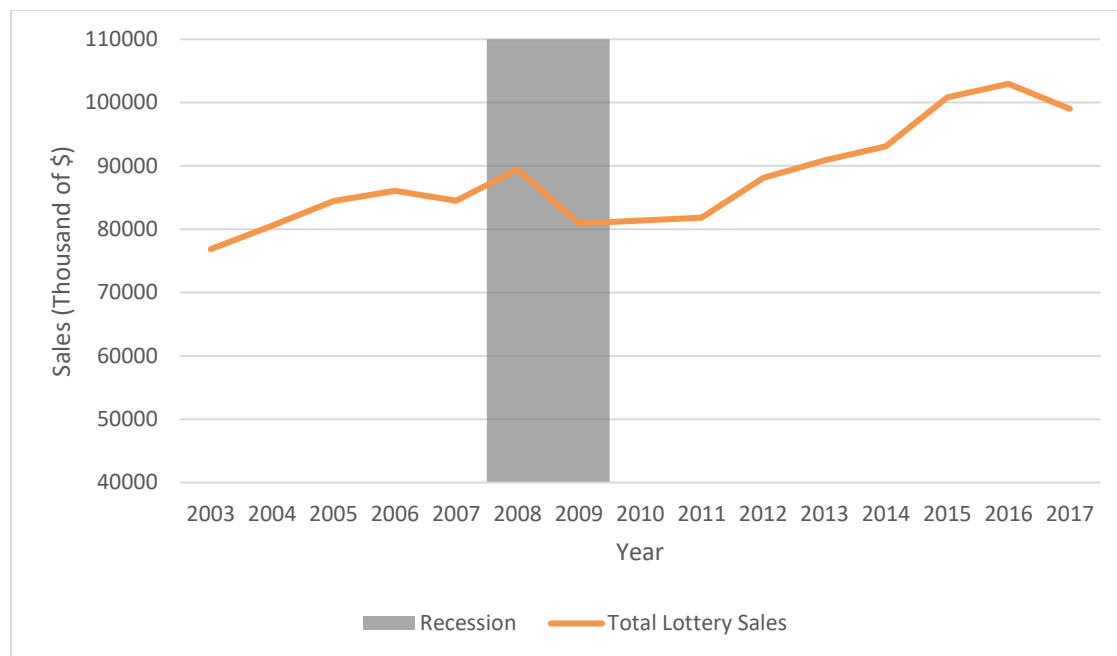
Figure 9: Nominal Plainville Lottery Sales, FY 2003-2017



Source: MA Lottery, FY 2003-2017, nominal dollars. Lottery sales in Plainville, like the state as a whole, decreased during the recession but have grown since 2012, with a noticeable increase in FY 2016, followed by slower growth in FY 2017.

Sales growth for fiscal years 2003-2017 for the combined area of Plainville and the MGC-designated surrounding communities is shown in Figure 10. For the combined area, fiscal year 2016 revenue increased 2.12% over fiscal year 2015 revenue, but, similar to the state as a whole, declined in fiscal year 2017 by 3.8% compared to fiscal year 2016.

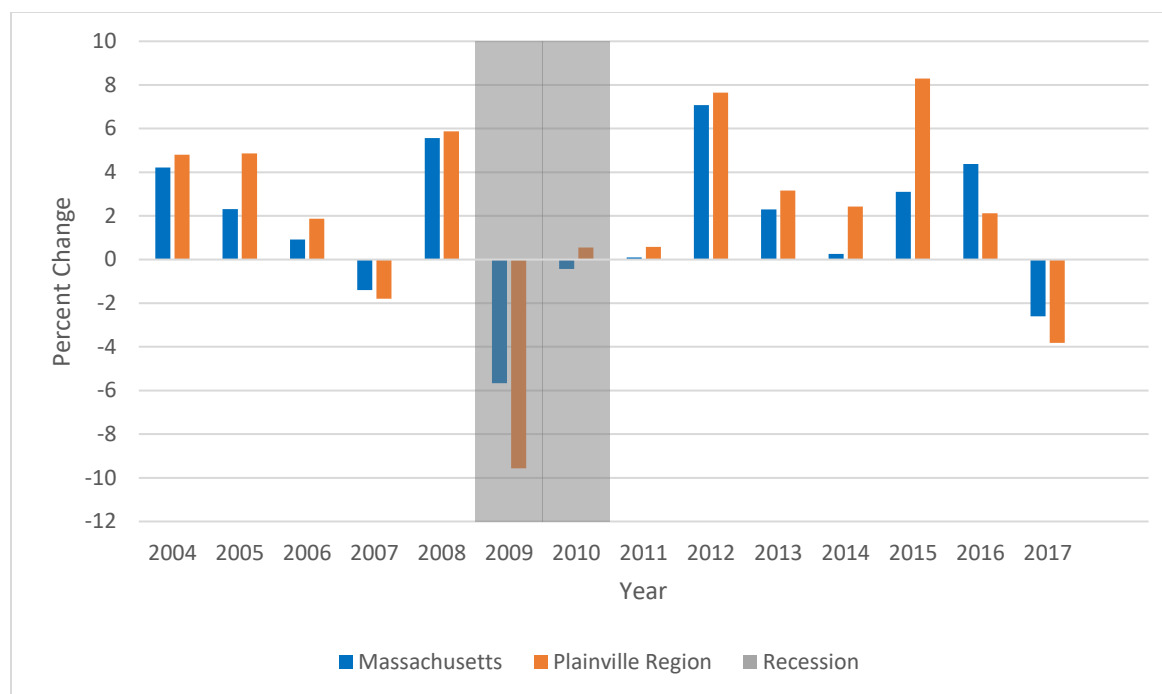
Figure 10: Nominal Lottery Sales for Plainville and MGC-designated Surrounding Communities, FY 2003-2017



Source: MA Lottery, FY 2003-2017, nominal dollars. Plainville and the surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham. Lottery revenues increased in FY 2016 compared to year before, but decline in FY 2017.

A comparison of the annual percentage change in total lottery sales for the combined area of Plainville and the surrounding communities relative to the percent change statewide is provided in Figure 11. Between 2011 and 2015, the growth in lottery sales in Plainville and the surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham has generally increased faster than the rest of the state. In fiscal year 2016, lottery sales grew less in the Plainville region (2.1%) compared to growth statewide (4.4%) and in fiscal year 2017, revenue declined further in the region (-3.8%) compared with the state as a whole (-2.6%).

Figure 11: Percent Change in Nominal Lottery Sales, Plainville & Surrounding Communities vs. Massachusetts, FY 2004-2017



Source: MA Lottery, FY 2003-2017, nominal dollars. Since the recession, the growth in lottery sales in Plainville and the surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham have generally increased faster than the rest of the state. In FY 2016, lottery sales grew less in the Plainville region compared to growth statewide and decreased more in FY 2017.

The next section analyzes agent-specific sales, thereby allowing a more detailed examination of sales at and near Plainridge Park Casino relative to other areas in the state.

Lottery Sales After Plainridge Park Casino Opening: A Two Year Comparison

Host and Surrounding Communities

The Massachusetts Lottery has provided agent-specific lottery sales data to the SEIGMA Economics team at the Donahue Institute. These data contain weekly lottery sales, by game, for every lottery sales agent in the state. These data are provided for the period of the week ending June 21, 2014 to July 29, 2017, allowing an analysis of the immediate impact, if any, on lottery sales resulting from the opening of the Plainville slot parlor on June 24, 2015.

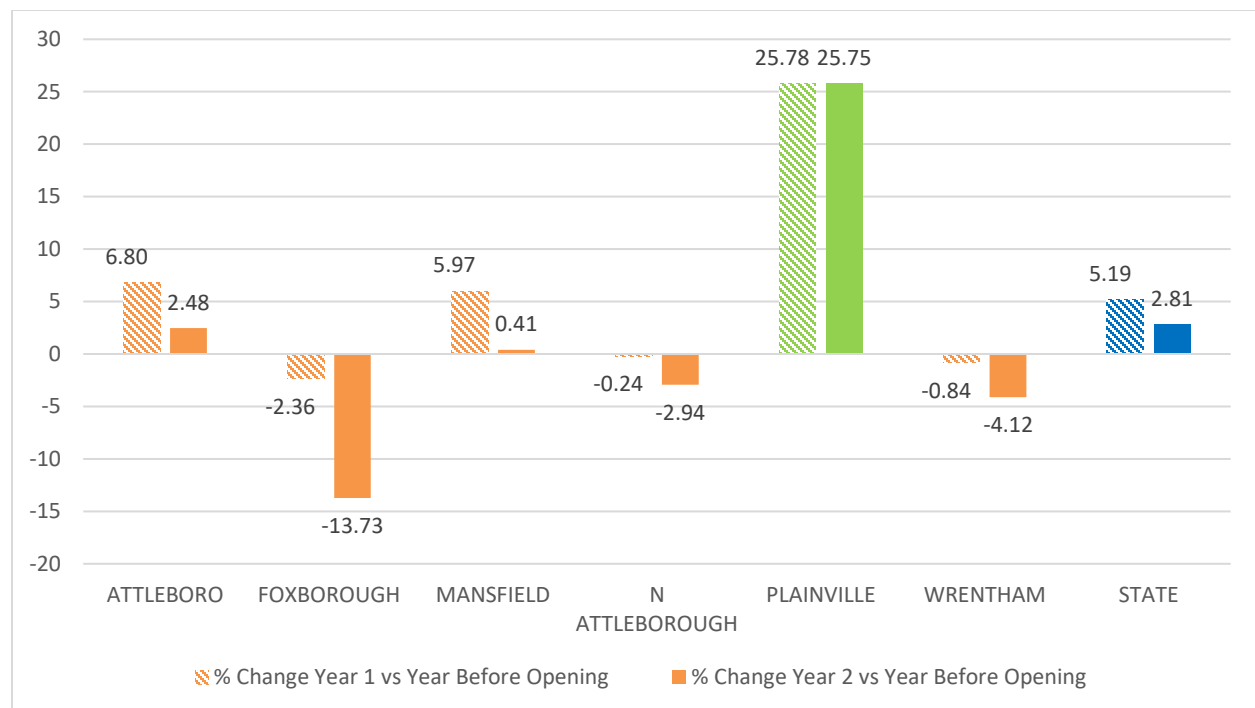
As a result of volatility in weekly sales, in part due to when sales are reported as well as jackpot rollovers, we aggregate the sales data into two-week periods. While confidentiality prevents us from reporting agent-specific sales, it is important to recall that a lottery agent began operating at Plainridge Park Racecourse in 1999.

Before presenting bi-weekly results, we focus on annual changes, comparing total sales prior to the casino opening during the period of June 15, 2014 to June 20, 2015 with total sales after the casino opening from June 21, 2015 to June 25, 2016 (designated year 1) and from June 26, 2016 to July 1, 2017

(designated year 2). Figure 12 presents percentage changes in total lottery sales for the host community of Plainville and the MGC designated surrounding communities. **The period from June 15, 2014 to June 20, 2015 is the period prior to the casino opening and serves as the base period. In the figures below, sales in year 1 and year 2 are relative to that base period. They are not year-over-year comparisons.** For example, statewide total sales for the year after opening were 5.19% higher than the year prior to opening. In year 2, statewide sales were 2.81% higher *than the year prior to opening*. The year-over-year change in sales between years 2 and 1 can be approximated by taking the difference between the year 2 and year 1 changes. For example, between year 2 and year 1, statewide sales declined approximately 2.4% ($2.81 - 5.19 = -2.38$).

Wrentham, Foxborough, and North Attleborough all experienced small declines in lottery sales in both years relative to the year prior to opening. Sales decreased most in Foxborough in the second year after opening, declining 13.73% compared to the year prior to opening. In the first year of casino operation, sales in Attleboro, Mansfield, and Plainville increased at a rate that exceeded statewide growth. In the second year, with the exception of Plainville, sales in the region either grew more slowly or declined compared to the state average. In the first year after opening, the highest rate of growth occurred in Plainville, where total sales increased 25.78%. In the second year of operation, sales in Plainville were still over 25% higher *than the year prior to opening*, but were 0.03% ($25.75 - 25.78 = -0.03$) below the first year.

Figure 12: Percent Change in Nominal Lottery Sales in Plainville & Surrounding Communities, Pre- and Post-Casino Opening



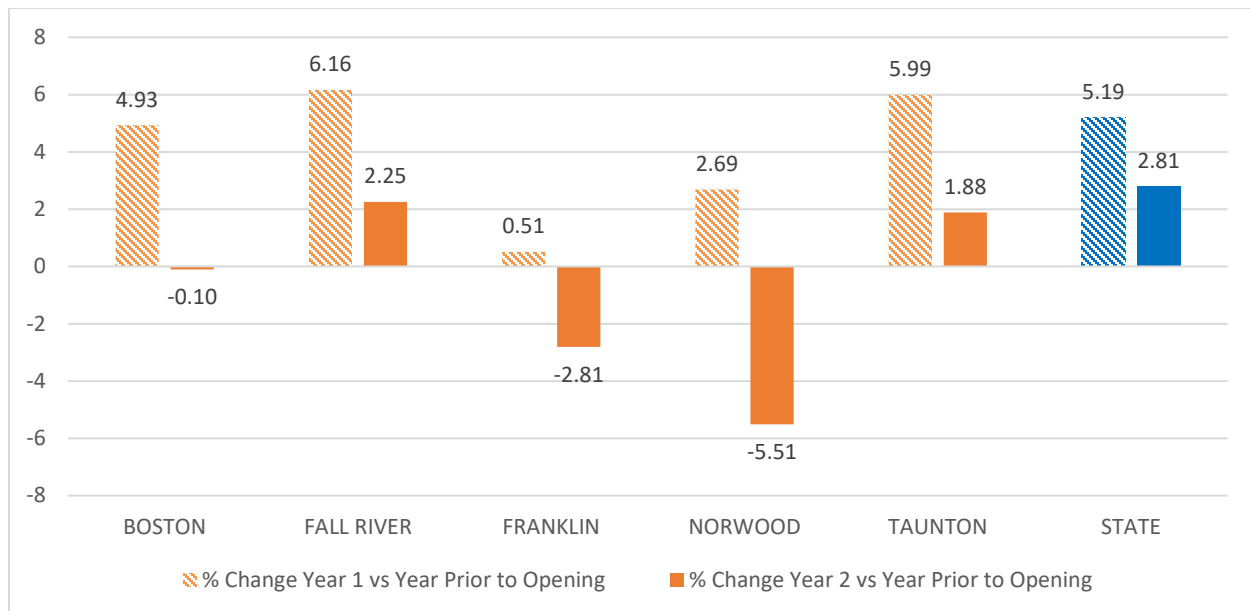
Source: MA Lottery, bi-weekly sales June 15, 2014-June 20, 2015 compared to bi-weekly sales June 21, 2015-June 25, 2016 and June 26, 2016-July 1, 2017, nominal dollars. Sales in Plainville increased dramatically (25.78%) in the first year but are essentially unchanged in the second year.

The results in Figure 12 are ambiguous as to the casino decreasing lottery sales in the region. In the second year of operation, sales in the surrounding communities of Attleboro and Mansfield increased, albeit below the state average. Second year sales in Foxborough, North Attleborough, and Wrentham decreased relative to the year prior to opening. Sales in Plainville notably increased compared to the year prior to the casino opening.

Lottery Sales by Patron Origination

The *Patron and License Plate Survey Report: Plainridge Park Casino 2016* (Salame et al., 2017) interviewed patrons and, among other questions, asked in which city or town they lived. North Attleborough, Attleboro, and Foxborough were among the most represented communities of the MGC-designated surrounding communities. Outside of those locales, the cities of Boston, Franklin, Taunton, and Fall River and the town of Norwood were the top five most represented locales. Figure 13 compares lottery sales in these communities in the first and second year of casino operation with the year prior to the casino opening.

Figure 13: Percent Change in Nominal Lottery Sales in Patron Origination Cities, Pre- and Post-Casino Opening

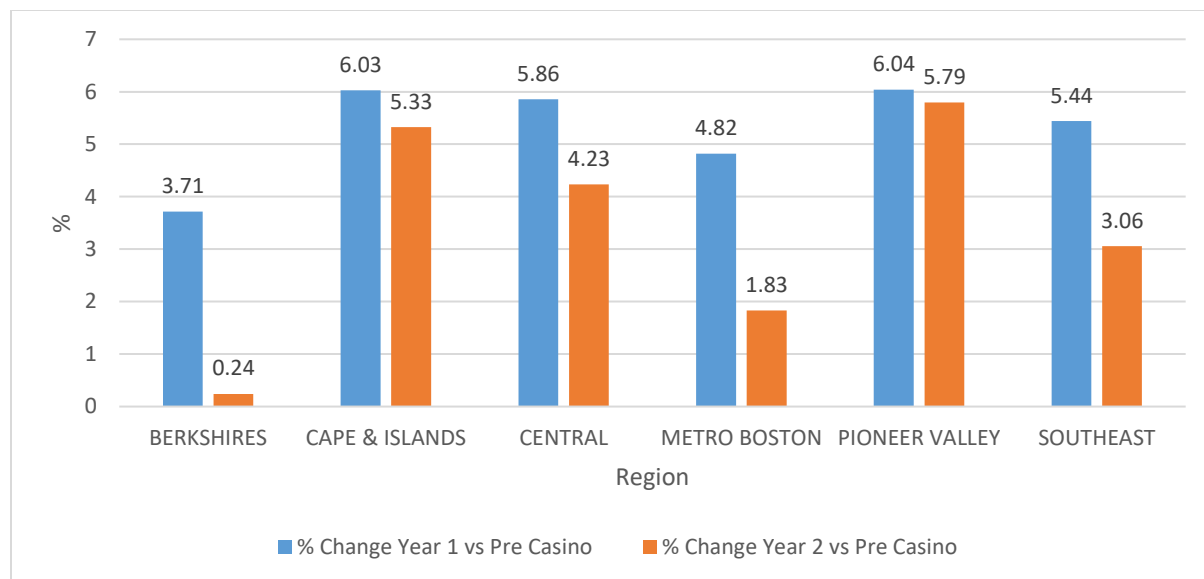


Source: MA Lottery, bi-weekly sales June 15, 2014-June 20, 2015 compared to bi-weekly sales June 21, 2015-June 25, 2016 and June 26, 2016-July 1, 2017, nominal dollars. Cities that were most represented in a patron survey and that are not a host or surrounding community.

The results in Figure 13 are in many ways analogous to those in Figure 12, specifically in regards to the underperformance of lottery sales in the second year of casino operation relative to the state as a whole. For example, sales in Fall River in the second year of casino operation were 2.25% higher than the year prior to the casino opening, whereas statewide sales over the same period were 2.81% higher. Sales in Taunton, while higher in the second year relative to the year prior to opening, were also below the state average. Sales in Boston, Franklin, and Norwood all decreased. Yet, as with the MGC-designated surrounding communities, year 1 sales growth is occasionally greater in some communities than the state as a whole, creating an ambiguous picture. Specifically, sales growth in Fall River and Taunton in year 1 exceeded the state average and sales growth in Boston was nearly identical.

Figure 14 illustrates the change in sales in the two years following the opening of Plainridge Park Casino by region. The Southeast region (Bristol and Plymouth counties) and Metro Boston region (Essex, Middlesex, Norfolk, and Suffolk counties) were the source of nearly 85% of the recaptured gambling dollars at Plainridge Park Casino. Figure 14 shows that in no cases were lottery sales in the region lower than the year prior to the opening of the casino. However, with the exception of the Berkshires region, there was less sales growth in the Metro Boston and Southeast regions than in other regions in the Commonwealth.

Figure 14: Percent Change in Nominal Lottery Sales by Region, Pre- and Post-Casino Opening



Source: MA Lottery, bi-weekly sales June 15, 2014-June 20, 2015 compared to bi-weekly sales June 21, 2015-June 25, 2016 and June 26, 2016-July 1, 2017, nominal dollars. Regions.

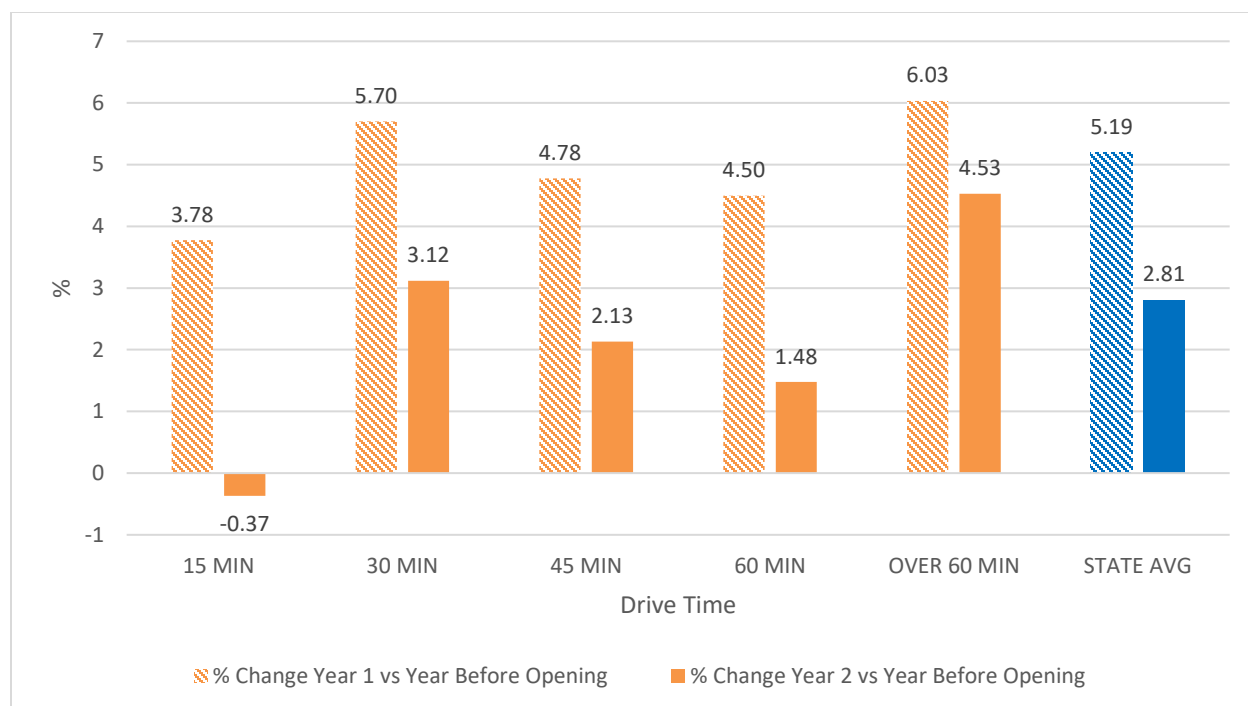
Lottery Sales by Driving Time from Plainridge Park Casino

In this section, we analyze sales by driving distance to the casino. This allows us to examine an alternate definition of surrounding community, thereby complementing the above analyses of the MGC-designated surrounding communities, patron origin, and region of the state.

The change in sales in years 1 and 2 compared to the year prior to the casino opening is presented in Figure 15. The category labeled 15 MIN includes all lottery agents 15 or fewer minutes' drive time from Plainridge Park Casino, including sales at the casino. The 30 MIN category includes all lottery agents 16 to 30 minutes' drive time from Plainridge Park Casino, and so on. The average percent change for the state is also included.

Outlets within a 15-minute drive of the casino experienced an increase in sales in the first year of 3.78% relative to the year prior to the casino opening. In the second year, sales for agents within a 15-minute drive were 0.37% below the year prior to the casino opening. In both years, therefore, agents within a 15-minute drive experienced slower revenue growth (year 1) or a decline (year 2) compared to other agents at greater distances and the state as a whole. However, sales at outlets 16 to 30 minutes from the casino grew more rapidly than sales statewide in both the first and second year of operation relative to the year prior to opening. As was the case with the first year analysis, there is no obvious pattern between lottery sales growth and proximity to the casino in that sales are not uniformly increasing at greater distances from the casino.

Figure 15: Percent Change in Lottery Sales by Driving Distance from Plainridge Park Casino



Source: MA Lottery, bi-weekly sales June 15, 2014-June 20, 2015 compared to bi-weekly sales June 21, 2015-June 25, 2016 and June 26, 2016-July 1, 2017, nominal dollars. 15 MIN category includes Plainridge Park Casino.

To summarize, the above analysis suggests that lottery sales near the casino in the second year after the opening of Plainridge Park Casino generally lagged the state as a whole, increasing less than the state as a whole and in some cases decreasing relative to the year prior to the casino opening. This occurs in the MGC-designated surrounding communities, for agents within a 15-minute drive of Plainridge Park Casino, and for the cities and regions most representing casino visitation as identified in the patron survey report (Salame et al., 2017). Whether the casino or other unobserved factors are responsible is not clear. The fact that some areas in the first year of post-casino operation outperformed the state further adds to the ambiguity. Certainly, however, there is no large, consistent, and significant decline in lottery revenue that can be clearly attributed to the casino.

Lottery Sales After Plainridge Park Casino Opening: Biweekly Agent-Level Analysis over Time

Host and Surrounding Community Analysis

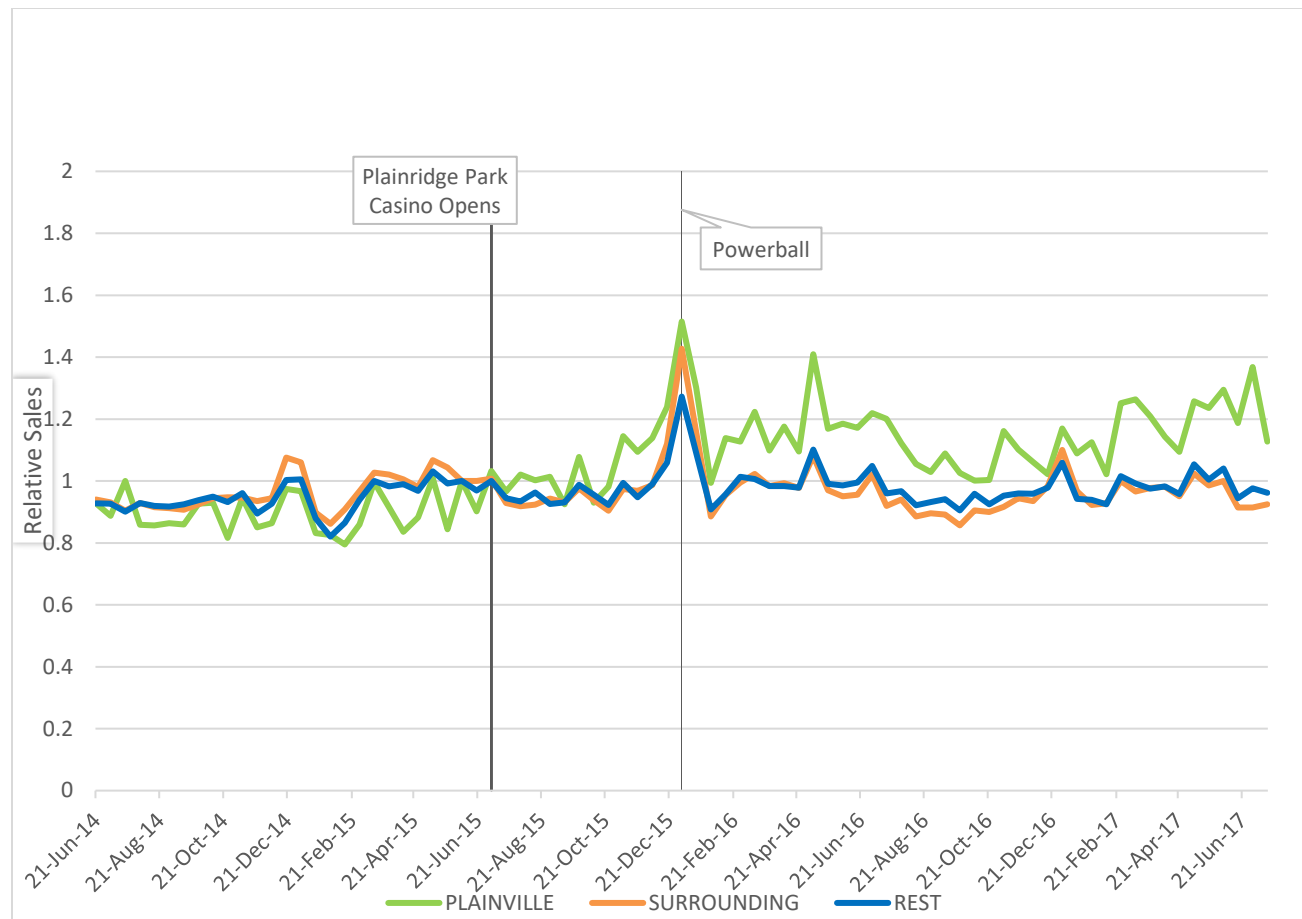
The analysis so far has examined fiscal year data or annual changes relative to the year prior to opening. The analysis below focuses on bi-weekly sales over the year before and two years after the opening of Plainridge Park Casino, thereby providing detail on the dynamics of lottery sales over time. We examine bi-weekly sales over the entire sample, from June 2014 to July 2017. The objective is to visualize and statistically test whether significant changes in lottery expenditures occurred after the opening of Plainridge Park Casino. This analysis is performed for the host and surrounding communities and various driving distances from Plainridge Park Casino.

Figure 16 shows bi-weekly total lottery sales over the period June 15, 2014 to July 29, 2017 for the communities of Plainville, the MGC-designated surrounding communities, and the rest of Massachusetts. Because lottery sales in these areas are vastly different (total lottery sales in the rest of Massachusetts are much greater than total sales in Plainville, for example), all sales data are reported relative to total sales during the two-week period prior to the casino opening (June 7, 2015-June 20, 2015). Thus, relative bi-weekly sales equal 1 for all areas for the June 7-June 20, 2015 period. Values greater than 1 signify bi-weekly sales data that exceed sales during the June 7-20 period, whereas values less than 1 signify lower bi-weekly sales compared to the June 7-20 period.

Figure 16 includes many interesting results. Relative sales in Plainville, which include the lottery agent in Plainridge Park Casino, are generally below the surrounding communities and the rest of Massachusetts prior to the casino opening. After the opening of Plainridge Park Casino, relative sales in Plainville equal or exceed relative sales in the surrounding communities and the rest of the state. This is true over the entire period with relative sales in year 2 essentially unchanged from year 1.

The surrounding communities are not noticeably affected. Prior to the casino opening, relative sales in the surrounding communities were slightly higher than relative sales in the rest of the state. After the casino opening, relative sales in the surrounding communities are more similar to the rest of Massachusetts or, in some instances, slightly below. This is consistent with the fiscal year analysis that found either slower growth or declines in revenue for various surrounding communities. The trends and variation exhibited by all areas are very similar. If the opening of the casino had a large negative impact on sales in, for example, the surrounding communities, we would expect to see relative sales decline and divergence from the rest of the state. Figure 16 shows no evidence of a large and significant negative impact on sales.

Figure 16: Relative Bi-Weekly Lottery Revenue over Time in Plainville, Surrounding Communities & Rest of Massachusetts



Source: MA Lottery, bi-weekly sales relative to two-week period prior to opening (June 7-June 20, 2015), nominal dollars. A value of 1 implies that sales during that period were equal to sales during June 7-20. A value greater than one represents higher sales, less than 1 lower sales. Relative sales in Plainville, including Plainridge Park Casino, were lower in Plainville prior to the casino opening and generally equal or exceed sales in the surrounding communities and state after opening. Relative sales for surrounding communities generally follow the sales pattern exhibited in the rest of Massachusetts. A significant negative impact on lottery sales in surrounding communities would be represented by relative sales being lower and falling faster than the rest of Massachusetts.

Difference-in-Differences Analysis of Host and Surrounding Communities

Figure 16 demonstrates the pattern of lottery sales in the host and surrounding communities before and after the casino opening and compares that pattern with the rest of the state. Difference-in-Differences (DID) analysis allows us to analyze lottery sales before and after the opening of the casino and determine if any observed changes are statistically significant (i.e., statistically different from no change). DID analysis involves comparing a “treatment” group with a “control” group. Changes in lottery sales for the treatment group before and after the casino opening are compared with changes in the control group before and after the casino opening. The difference between these changes (i.e., differences) is also compared, hence the name difference-in-differences. Intuitively, we want to know whether lottery sales in the treatment group changed differently than the control group, which represents what might have happened had the casino not opened.

In our analysis, the treatment group is defined by community type (host and surrounding) and driving distance from Plainridge Park Casino. Table 1 provides results from a DID analysis when the treatment group is defined to be all agents in Plainville, including the agent at Plainridge Park Casino. Table 1 shows that prior to the casino opening, average bi-weekly sales per agent in Plainville were \$22,797. After the casino opened, average bi-weekly sales per agent increased to \$29,018, a statistically significant increase of \$6,221. Table 1 also demonstrates that average bi-weekly sales per agent in the rest of Massachusetts increased approximately \$746, from \$25,514 before the casino opened to \$26,260 after the casino opened. The difference between the change in Plainville and the change in the rest of Massachusetts is \$5,474, an increase that is statistically significant (i.e., different than zero) at the 1% level of significance. This difference tells us that average bi-weekly sales for agents in Plainville increased \$5,474 more than average bi-weekly sales for other agents in state.

Note that the results in Table 1 quantify and reaffirm Figure 16. Prior to the casino opening, average bi-weekly lottery sales per agent in Plainville were below the state average, but after the casino opened, they exceeded the state average. This is evident in Figure 16.

Table 1: Difference-in-Differences Analysis of Average Bi-Weekly Lottery Sales by Agent, Plainville vs. Rest of Massachusetts

	Before Plainridge Park Casino	After Plainridge Park Casino	Difference^a
Plainville ^b	22,797.05 (1,090.02)	29,018.56 (1,166.54)	6,221.50*** (1,614.49)
Rest of State	25,514.05 (62.71)	26,260.59 (45.33)	746.53*** (78.08)
Difference in Differences			5474.97*** (1,804.64)

^aA *, **, and *** represent statistical significance at the 10, 5, and 1 % level, respectively. Standard errors in parentheses.

^bIncluding Plainridge Park Casino

Source: MA Lottery, average bi-weekly sales per agent, June 15, 2014-June 20, 2015 compared to average bi-weekly sales per agent June 21, 2015-July 22, 2017. Average bi-weekly lottery sales per agent in Plainville increased \$6,221 compared to the rest of the state where average bi-weekly sales per agent increased \$746. Thus, average bi-weekly sales in Plainville increased a statistically significant \$5,474 more than agents in the rest of the state.

Table 2 presents results for a DID analysis comparing the MGC-designated surrounding communities with the rest of Massachusetts. The results show that average bi-weekly sales per agent in surrounding communities decreased by \$626 on average over the two-year period after the casino opened. This decrease, however, is not statistically significant, implying that we cannot confidently reject this decrease from a change of zero. Average bi-weekly sales per agent for the rest of Massachusetts, however, increased by \$782. The difference of \$-1,409 is statistically significant. These results quantify what is presented in Figure 16. Prior to the opening of the casino, the surrounding communities had

average sales that slightly exceeded average sales for the rest of the state. After the casino opened the surrounding communities have average sales slightly below the rest of the state.

Table 2: Difference-in-Differences Analysis of Average Bi-Weekly Lottery Sales by Agent, Surrounding Communities vs. Rest of Massachusetts

	Before Plainridge Park Casino Opened	After Plainridge Park Casino Opened	Difference^a
Surrounding Communities ^b	25,618.47 (540.96)	24,991.77 (373.54)	-626.69 (655.74)
Rest of State	25,506.92 (63.00)	26,289.68 (45.61)	782.76*** (78.51)
Difference in Differences			-1409.45** (583.64)

^aA *, **, and *** represent statistical significance at the 10, 5, and 1 % level, respectively. Standard errors in parentheses.

^bAttleboro, Foxborough, Mansfield, North Attleborough, Wrentham

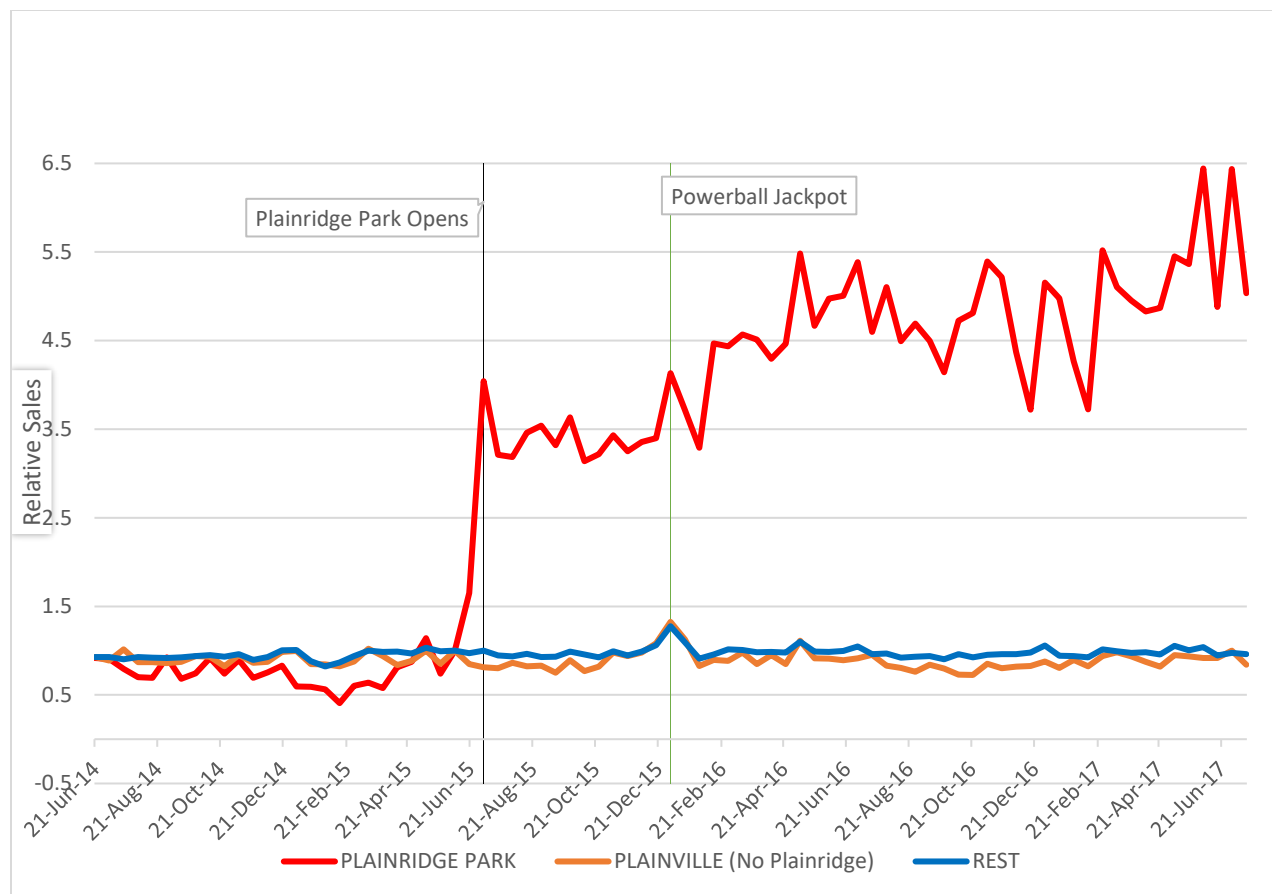
Source: MA Lottery, average bi-weekly sales per agent, June 15, 2014-June 20, 2015 compared to average bi-weekly sales per agent June 21, 2015-July 22, 2017. Average bi-weekly lottery sales for agents in surrounding communities decrease by \$626 after the casino opened. This is below the average bi-weekly increase for agents in the rest of the state of \$782.

Plainridge Park and Other Agents in Plainville

Figure 17 analyzes Plainville more closely. Specifically, relative sales at Plainridge Park Casino are separated from relative sales for other agents in Plainville. Recall that these are sales over time relative to total sales during the two-week period prior to the casino opening.

The most obvious feature of Figure 17 is the large increase in relative sales at Plainridge Park Casino corresponding with the casino's opening. The volume of sales at Plainridge Park Casino increases dramatically shortly after the casino's opening before levelling off.

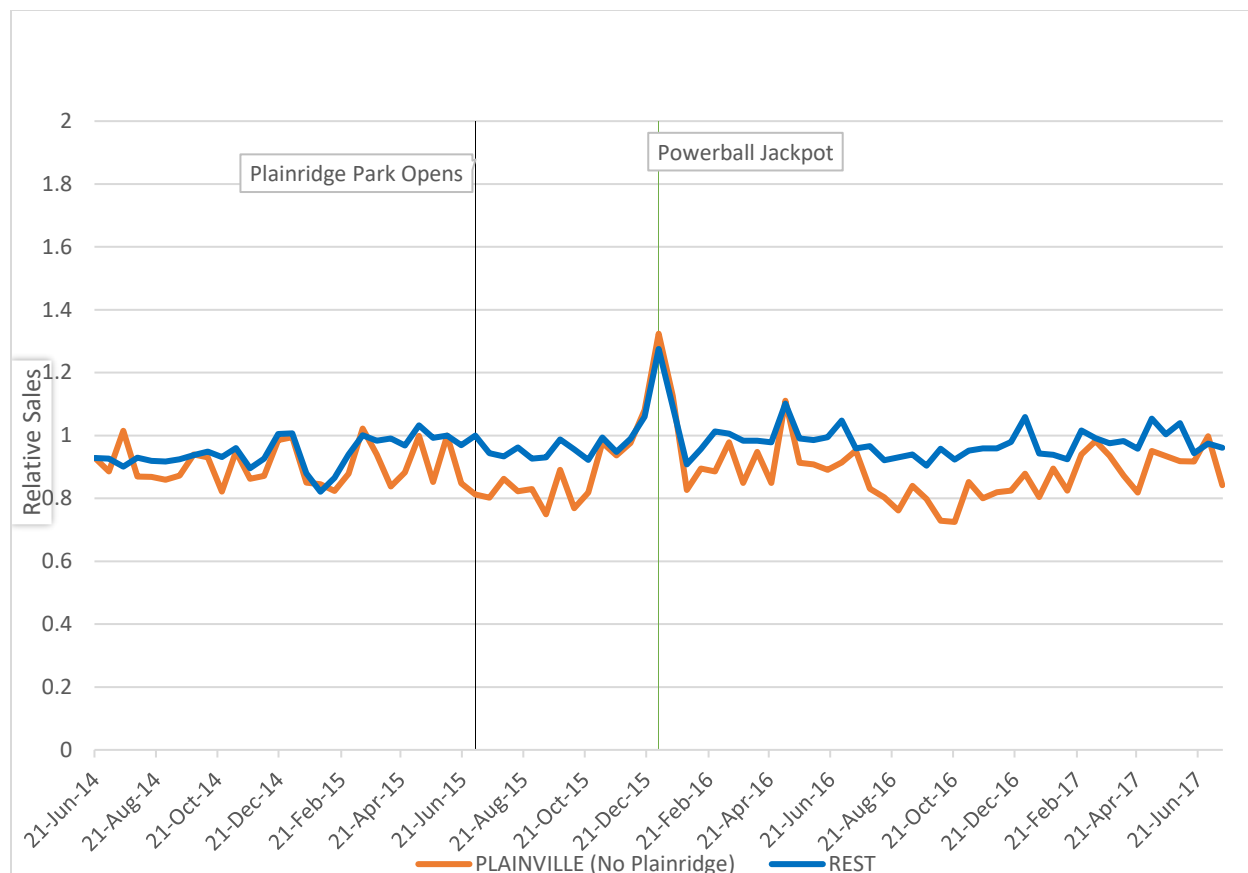
Figure 17: Relative Bi-Weekly Lottery Revenue over Time by PPC, Other Agents in Plainville, and Rest of Massachusetts.



Source: MA Lottery, bi-weekly sales relative to two-week period prior to opening (June 7-June 20, 2015), nominal dollars. Thus, a value of 1 implies that sales during that period were equal to sales during June 7-20. A value greater than 1 represents higher sales and less than 1 represents lower sales. Sales at Plainridge Park Casino notably increased. Sales at other agents in Plainville have relative sales slightly below the state average.

This increase in sales, however, does not appear to have been exclusively at the expense of other agents in Plainville. Prior to the casino opening, relative sales at other agents were similar to, or slightly below, the rest of Massachusetts. After the opening of the casino, relative sales remain slightly below the state as a whole. Figure 18 excludes the relative sales of Plainridge Park Casino from Figure 17, allowing for a more detailed examination of relative sales for other agents in Plainville compared to relative sales for the rest of the state. There is no evidence of a notable decline in sales at other agents in Plainville. A DID analysis, not reported here in order to ensure the confidentiality of sales at Plainridge Park Casino, confirms that average bi-weekly sales for other agents in Plainville decreased after the opening of the casino, but this decrease is approximately 1% of average biweekly sales and is not statistically significant.

Figure 18: Relative Bi-Weekly Lottery Revenue over Time for Other Agents in Plainville and the Rest of Massachusetts



Source: MA Lottery, bi-weekly sales relative to the two-week period prior to the casino opening (June 7-June 20, 2015), nominal dollars. Relative sales at other agents in Plainville are at or slightly below the state average both before and after the casino opening.

Lastly, Table 3 reports results when examining Plainville and the designated surrounding communities combined, including Plainridge Park Casino. This allows an analysis of the net effect from the increase in Plainville and the decrease in the surrounding communities. Over the two-year period, average bi-weekly sales slightly increased compared to the period before the casino opening by approximately \$6. Agents in the rest of the state fared better, on average, experiencing an increase in sales of approximately \$772. The difference between agents in Plainville and the surrounding communities compared to agents in the rest of the state is not statistically significant. This suggests that there has not been a statistically significant change in lottery sales, on average, in the host and surrounding communities combined, both separately and relative to the state as a whole.

Table 3: Difference-in-Differences Analysis of Average Bi-Weekly Lottery Sales by Agent, Plainville and Surrounding Communities vs. Rest of Massachusetts

	Before Plainridge Park Casino	After Plainridge Park Casino	Difference ^a
Plainville + Surrounding Communities ^b	25,351.91 (500.70)	25,357.89 (355.96)	5.97 (618.59)
Rest of State	25,512.13 (63.08)	26,284.53 (45.64)	772.40*** (78.59)
Difference in Differences			-766.43 (556.27)

^aA *, **, and *** represent statistical significance at the 10, 5, and 1 % level, respectively. Standard errors in parentheses.

^bAttleboro, Foxborough, Mansfield, North Attleborough, Plainville, and Wrentham

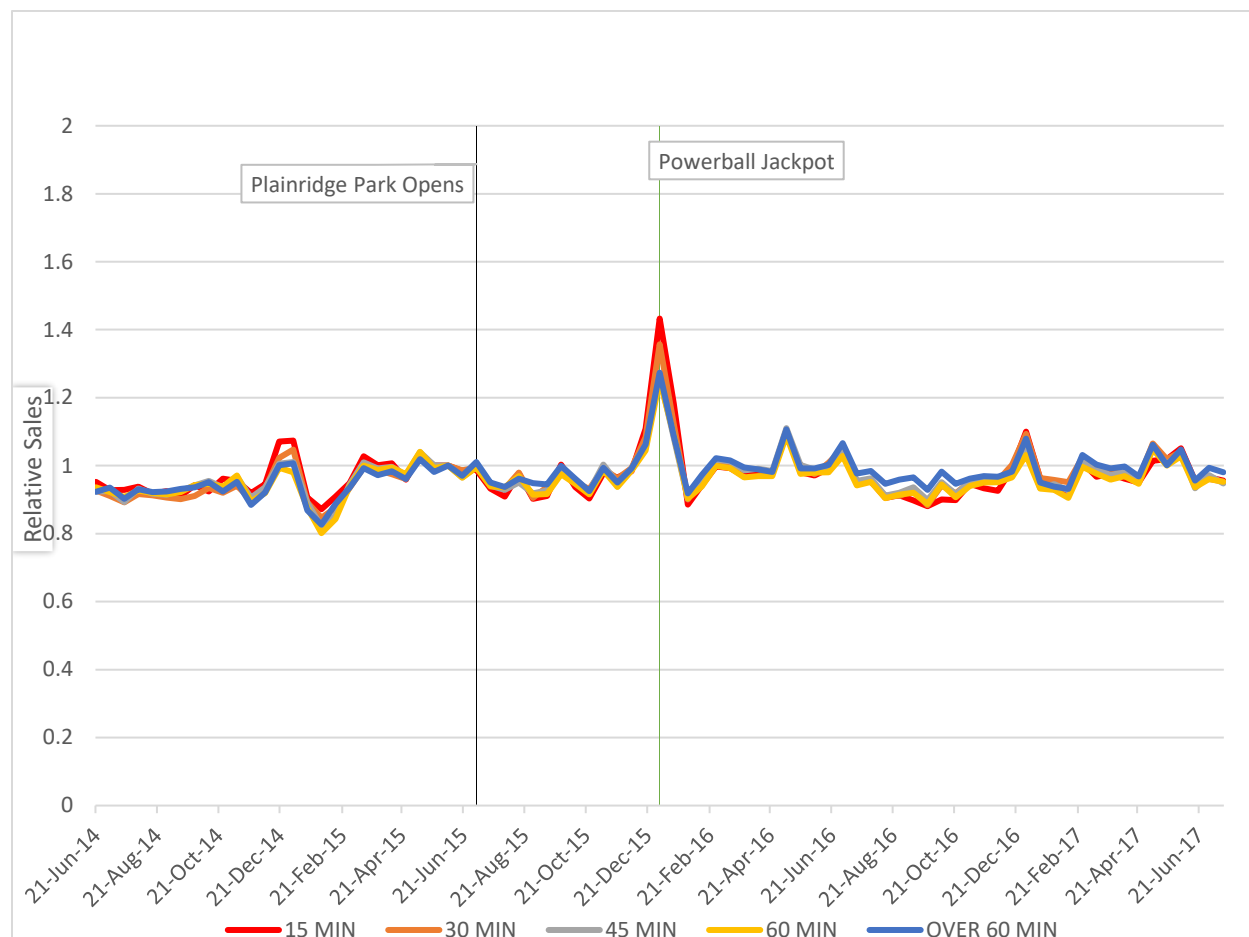
Source: MA Lottery, average bi-weekly sales per agent, June 15, 2014-June 20, 2015 compared to average bi-weekly sales per agent June 21, 2015-July 22, 2017. Average bi-weekly lottery sales for agents in Plainville and surrounding communities increase by approximately \$6, on average, after the casino opened. This is below the average bi-weekly increase for agents in the rest of the state of \$772.

Drive Time Analysis

The analysis for host and surrounding communities suggests that lottery sales at Plainridge Park Casino significantly increased. This increase was most pronounced in the first year following the opening of the casino with sales levelling off in year 2. Sales at other agents in Plainville and agents in the MGC-designated surrounding communities, on average, decreased slightly.

Figure 19 illustrates relative bi-weekly sales for agents within various drive time distances of Plainridge Park Casino. Plainridge Park Casino is included in the 15 MIN category, which includes all agents between a 0 to 15-minute drive time from Plainridge Park Casino. The 30 MIN category includes all agents that are a 16 to 30-minute drive time from Plainridge Park Casino, etc. Relative bi-weekly sales patterns are very similar by drive distance. Relative sales (sales relative to the two-week period prior to opening) for all drive distances have similar trends and variation, both before and after the casino opening. An adverse impact on lottery sales from the opening of Plainridge Park Casino would likely occur among agents closer to the casino. There is no evidence of this in Figure 19.

Figure 19: Relative Bi-Weekly Lottery Revenue over Time for Agents at Various Distances from PPC



Source: MA Lottery, bi-weekly sales relative to two-week period prior to opening (June 7-June 20, 2015), nominal dollars. The category 15 MIN includes all agents within 15 minutes of Plainridge Park Casino, including Plainridge Park Casino. 30 MIN represents agents 16-30 minutes away from Plainridge Park Casino, etc. Relative sales for all distances follow a similar trend, showing no sign of a different or adverse impact after the casino opened.

Difference-in-Differences Analysis by Drive Time

Tables 4 and 5 present DID analysis for agents within a 15-minute drive of Plainridge Park Casino and agents 16-30 minutes from Plainridge Park Casino. For this analysis, we exclude Plainridge Park Casino. This analysis was performed because we have already seen that sales at Plainridge Park Casino increased significantly and we are interested in whether any adverse impact was felt by other agents. Similar to the results for the surrounding communities, Table 3 demonstrates that average bi-weekly sales for agents within a 15-minute drive of the casino decreased slightly relative to agents more distant from the casino. Specifically, average bi-weekly sales for agents within 15 minutes decreased by \$305, a decrease that is not statistically significant. Average bi-weekly sales for other agents in the state increased by a statistically significant \$775. The difference in the average bi-weekly sales, \$-1,081, is statistically significant. While statistically significant, the difference of \$1,081 represents approximately 5% of

average bi-weekly sales. When including Plainridge Park Casino (results not reported to ensure confidentiality of lottery sales), sales for agents within a 15-minute drive increase slightly, but the increase is less than the rest of Massachusetts and not statistically significant. The difference between all agents within a 15-minute drive, including the casino, and agents in the rest of the state remains negative, suggesting slower growth for agents within a 15 mile radius. This, however, is not statistically significant. Thus, as was the case when examining Plainville and the surrounding communities combined, when including lottery sales at Plainridge Park Casino with the agents within a 15-minute drive, there is no statistical change in lottery sales.

Table 4: Difference-in-Differences Analysis of Average Bi-Weekly Lottery Sales by Agent within 15-Minute Drive of PPC vs. Rest of Massachusetts

	Before Plainridge Park Casino	After Plainridge Park Casino	Difference^a
Agents within 15 Minute Drive of Plainridge Park ^b	22,933.8 (277.10)	22,628.59 (194.44)	-305.21 (338.35)
Rest of State	25,584.65 (63.94)	26,360.54 (46.24)	775.89*** (79.63)
Difference in Differences			-1081.09** (470.46)

^aA *, **, and *** represent statistical significance at the 10, 5, and 1 % level, respectively.

^bExcluding Plainridge Park Casino

Source: MA Lottery, average bi-weekly sales per agent, June 15, 2014-June 20, 2015 compared to average bi-weekly sales per agent June 21, 2015-July 22, 2017. Sales for Plainridge Park Casino are excluded from this analysis in order to examine whether other agents experienced adverse impacts. Average bi-weekly sales for agents within 15 minutes of Plainridge Park Casino decreased approximately \$305, a decrease that is not statistically significant. Average bi-weekly sales for agents further from the casino increased, on average, by \$775. The difference, of \$1,081 is statistically significant at the 5% level.

Table 5 compares agents within a 16 to 30-minute drive of the casino with agents at a greater distance. Thus, agents within a 0 to 15-minute drive are not included in the rest of Massachusetts. This analysis was performed to be consistent with Table 3 where agents within 15 minutes of the casino were compared with agents more distant.

After the casino opened, average bi-weekly sales for agents within a 16 to 30-minute drive of Plainridge Park Casino increased a statistically significant \$664. Agents more distant from the casino also experienced a statistically significant increase, on average, of \$788. The difference in the change, \$-123, is not statistically significant, again signifying no statistical difference in average bi-weekly sales growth between the two groups.

Table 5: Difference-in-Differences Analysis of Average Bi-Weekly Lottery Sales by Agent within 16-30 Minute Drive of PPC vs. Rest of Massachusetts

	Before Plainridge Park Casino	After Plainridge Park Casino	Difference ^a
Agents within 30 Minute Drive of Plainridge Park	24,938.12 (204.28)	25,602.31 (148.24)	664.18*** (255.44)
Rest of State ^b	25,650.5 (67.32)	26,438.53 (48.66)	788.03*** (83.80)
Difference in Differences			-123.85 (274.57)

^aA *, **, and *** represent statistical significance at the 10, 5, and 1 % level, respectively. Only agents open over the whole sample period.

^bDoes not include agents within 15-minute drive.

Source: MA Lottery, average bi-weekly sales per agent, June 15, 2014-June 20, 2015 compared to average bi-weekly sales per agent June 21, 2015-July 22, 2017. Agents within a 15-minute drive are not included in the Rest of State category. Average bi-weekly sales for agents that are a 16 to 30-minute drive from Plainridge Park Casino increased, on average by \$664, whereas more distant agents increased by \$788. Both increases are statistically significant, but the difference between the changes is not statistically significant.

Results for agents within a 31 to 45-minute drive, not separately reported, indicate that average bi-weekly sales increased \$508 versus \$914 for agents that are more distant. The difference, approximately \$-405, is statistically significant.

The analyses by community status (host versus surrounding) and drive time indicate that lottery sales at agents in the surrounding communities and those within a 15-minute drive lagged behind lottery sales for the rest of Massachusetts. Lottery sales in the surrounding communities and within 15 minutes all declined, although the decreases are small relative to average sales and are not statistically significant. When compared to the increase in the rest of the state, those declines are statistically significant but remain a relatively small percentage of average bi-weekly sales. Whether this underperformance of sales for agents near Plainridge Park Casino is due to the casino itself or other unobserved factors that may have impacted sales (e.g., a change in ownership, road construction, changes in management or staff, closures due to remodeling, corporate buyouts) is not clear. Average sales per agent for agents within a 16 to 30-minute drive of the casino -- which many might also consider close to the casino -- increased. This increase, however, was less than the state. Moreover, sales for other agents in Plainville only decreased modestly (approximately 1%) and not significantly. Finally, when including Plainville and the agent at Plainridge Park Casino, sales slightly increased over the two-year period, but less than the state as a whole. The difference with other agents in the state is also not statistically significant. Thus, there is no clear evidence that the casino has negatively affected lottery sales overall. What is clear is that lottery sales for agents in the designated surrounding communities and within a 15-minute drive have underperformed, on average, relative to more distant agents, but not dramatically so.

Summary and Future Work

The results presented above demonstrate that nominal lottery sales (i.e., not adjusted for inflation) annually increased between FY 2012 and FY 2016, but declined in FY 2017. The introduction of casino gambling in Massachusetts may adversely affect lottery sales if casinos are a substitutable form of gambling.

Statewide lottery sales grew 4.3% in fiscal year 2016, a period of time that nearly corresponds to the first full year of operation of Plainridge Park Casino, which opened June 24, 2015. In fiscal year 2017, however, statewide lottery sales declined by approximately 2.6%. The rate of growth in fiscal year 2016 exceeded the historical average of 1.4% and was the second highest rate of growth since 2012. The decline in fiscal year 2017 lottery sales reverses the annual increases in sales experienced since 2012. Lottery sales for the city of Plainville increased 25% in the year after the casino opened relative to the prior year and practically remained at that level in the second year. Much of this increase in the first year of casino operation occurred at Plainridge Park Casino where sales increased nearly four-fold compared to sales prior to the casino opening.

Sales for lottery agents in the surrounding communities of Attleboro, Foxborough, Mansfield, North Attleborough, and Wrentham, *combined*, did not decline in the first year following the opening of the new casino, but did grow more slowly, increasing 3.6% over the year prior to opening compared to 5.2% for lottery sales statewide. In the second year of operation, sales in the *combined* surrounding communities decreased by 1.5% relative to the year prior to opening compared to a 2.8% increase statewide. Total sales for agents within a 15-minute drive of the casino, even when including Plainridge Park Casino, follow a similar pattern, growing more slowly in the first year (3.78%) and decreasing (0.37%) in the second year. However, total sales for agents within a 16 to 30-minute drive of the casino performed better than the state as a whole, increasing in both years following the opening of the casino, by 5.70% in year 1 and 3.12% in year 2 relative to the year prior to opening.

There are several qualifiers to the above results. One, as demonstrated above, average bi-weekly lottery sales for agents in the designated surrounding communities and those within a 15-minute drive of the casino over the two years since the casino opened are lower than before the casino opened. This is an average and does not imply that all agents had lower sales. While the reduction in sales is not statistically significant, the difference between these agents and other agents in the state, which on average had modest gains in sales over the two-year period, is statistically significant. The difference represents about 5% of average bi-weekly sales. However, when the increase in sales in Plainville and Plainridge Park Casino is considered, total lottery sales in the host and surrounding communities and those agents within a 15-minute drive of the casino are higher on average in the two years following the casino opening, but not as high as other agents in the state. In short, the gains in Plainville have been sufficient to offset declines in the surrounding and nearby communities, but not enough to match gains in the rest of the state over the two-year period. However, the difference is not statistically significant, so it is not possible to statistically conclude any directional change in lottery revenues. In other words, statistically, lottery sales in the host and nearby communities (MGC-designated surrounding communities and within a 15-minute drive) remains unchanged.

It is important to keep in mind that the post-casino period of July 2015 to July 2017 is relatively short and should not be interpreted as representative of longer-term impacts. This is especially true given the year-to-year variation in lottery sales exhibited over time. The declines in sales in the designated

surrounding communities and for agents within a 15-minute drive may be due to other unobserved factors. Moreover, the casino at Plainridge Park is a different scale compared to the other casinos scheduled to open in Massachusetts, which will be larger and include more non-casino amenities. The above results may not foreshadow results for the casino openings in Springfield or Everett.

Going forward, the Massachusetts Lottery has graciously agreed to continue to provide us agent-specific data. This will allow us to analyze the impact of Plainridge Park Casino over time and provide extended baseline data for Springfield and Everett and their surrounding communities. This will include the MGC-designated surrounding communities, communities within various distances from the casinos, and communities identified in the patron survey. We will also continue to analyze data on a calendar year and fiscal year basis by town. Determining the longer-term impact that casinos have on lottery revenues, by definition, will take time.

Charity Gambling

Charity gambling consists of bingo games, raffles, charity game tickets, and casino functions. Calendar year 2016 gross receipts were \$59,533,184, an increase from 2015 when gross receipts were \$57,976,236. Charity gambling is comprised of bingo games (45.3%), raffles (32.3%), charity game tickets (21.8%), and casino functions (0.6%).⁸ Charity gambling has generally been declining every year in Massachusetts. For example, bingo gross receipts were \$88,208,825 for calendar year 2003, but had declined to \$26,987,266 by calendar year 2016. Attleboro is the only MGC-designated surrounding community with any charity gambling, so an analysis of the impact of the casino on charity gambling is not practical at this time. Bingo receipts in Attleboro increased 5.5% in calendar year 2016, but have declined at an average annual rate of approximately 11% since 2003. Given the limited time the casino has been open and that Attleboro is the only surrounding community to have charity gambling, it is not possible to determine any casino-related impacts. We will continue to gather charity gambling data and will analyze those impacts as casinos open in the future.

⁸ Charity Games, 2015 Annual Report, Massachusetts State Lottery Commission.
<http://www.masslottery.com/lib/downloads/games/Charitable%20Gaming%20AR%202016%20FINAL.pdf>

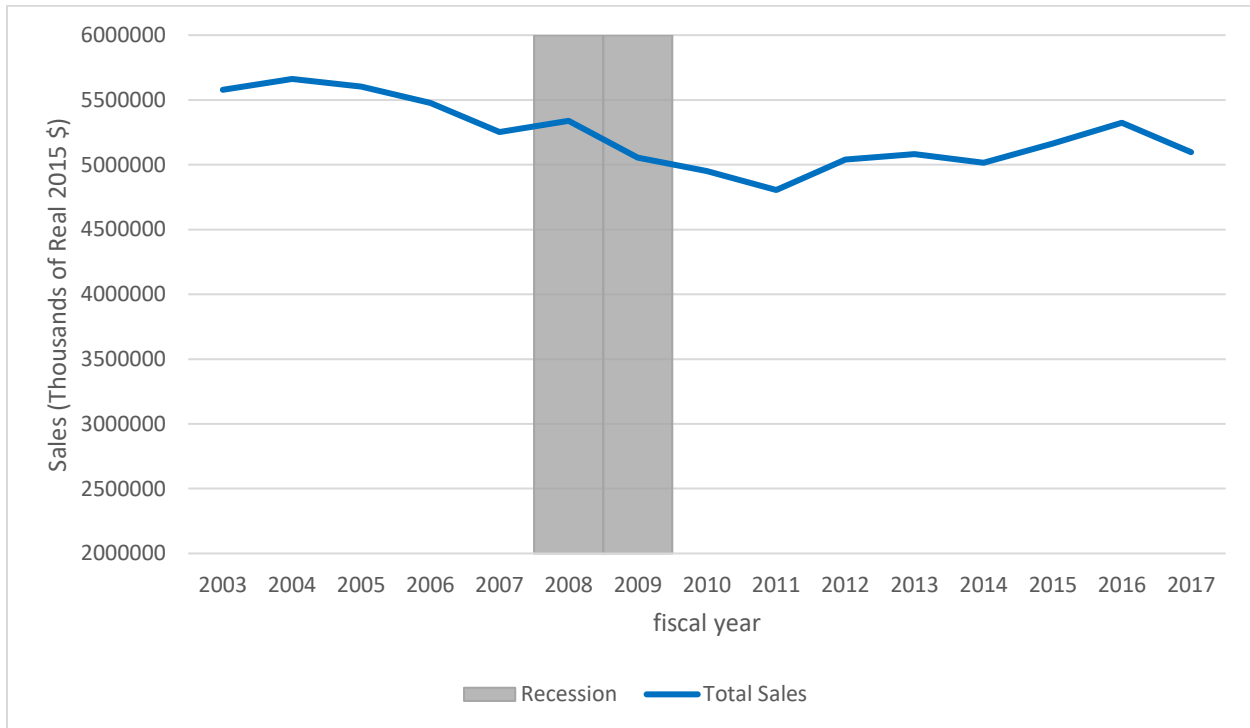
References

Salame, L., Williams, R., Zorn, M., Peake, T., Volberg, R., Stanek, E, & Mazar, A. (2017), *Patron and License Plate Survey Report: Plainridge Park Casino 2016*. Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

Appendix A: Inflation Adjusted Lottery Sales

Figure A1 shows total lottery sales expressed in real 2017 dollars. Nominal dollars have been adjusted for inflation using the Bureau of Labor Statistics CPI-U, the Consumer Price Index for all Urban Consumers.

Figure A1: Total Lottery Sales, 2003-2017 (in 2017 Dollars)

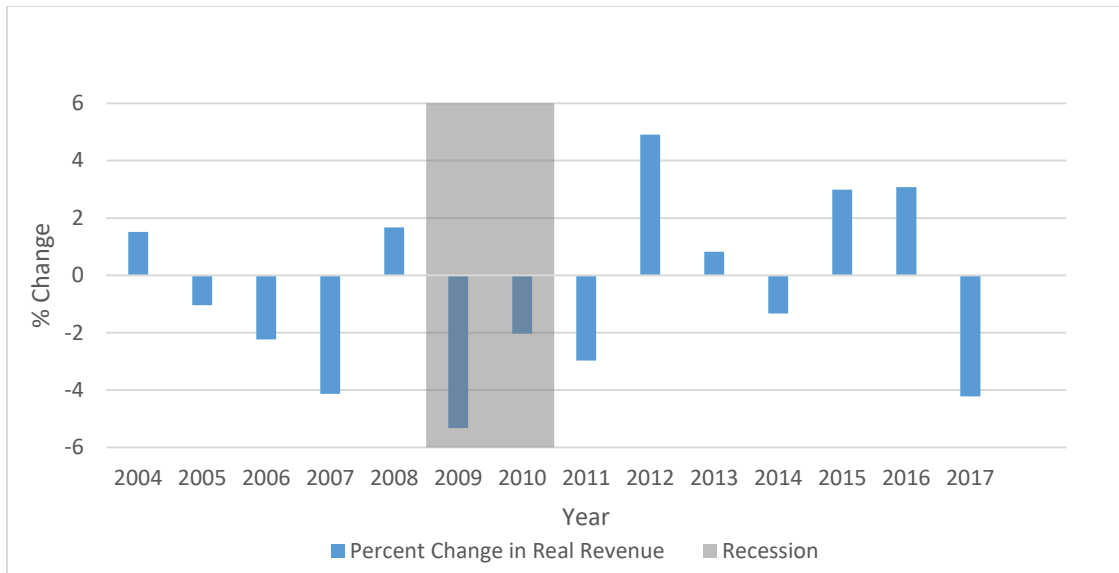


Source: MA Lottery and Bureau of Labor Statistics

Figure A1 shows that nominal lottery sales growth over the period of 2003 to 2017 has not kept up with inflation. The annualized inflation rate over this period was 2.04%, which exceeded the 1.37% annualized growth in nominal revenues. Figure A1 demonstrates the notable decline in sales resulting from the recession and economic slowdown as well as the recovery in lottery sales beginning in fiscal year 2011. In real terms, lottery sales have recovered from the Great Recession and are approximately equivalent to real expenditures in fiscal year 2009 but remain below expenditures prior to 2008.

Figure A2 illustrates the annual percentage change in inflation adjusted (2017) dollars. Adjusting for inflation, total lottery sales declined 4.2% in fiscal year 2017. Real sales increased approximately 3% in fiscal years 2015 and 2016.

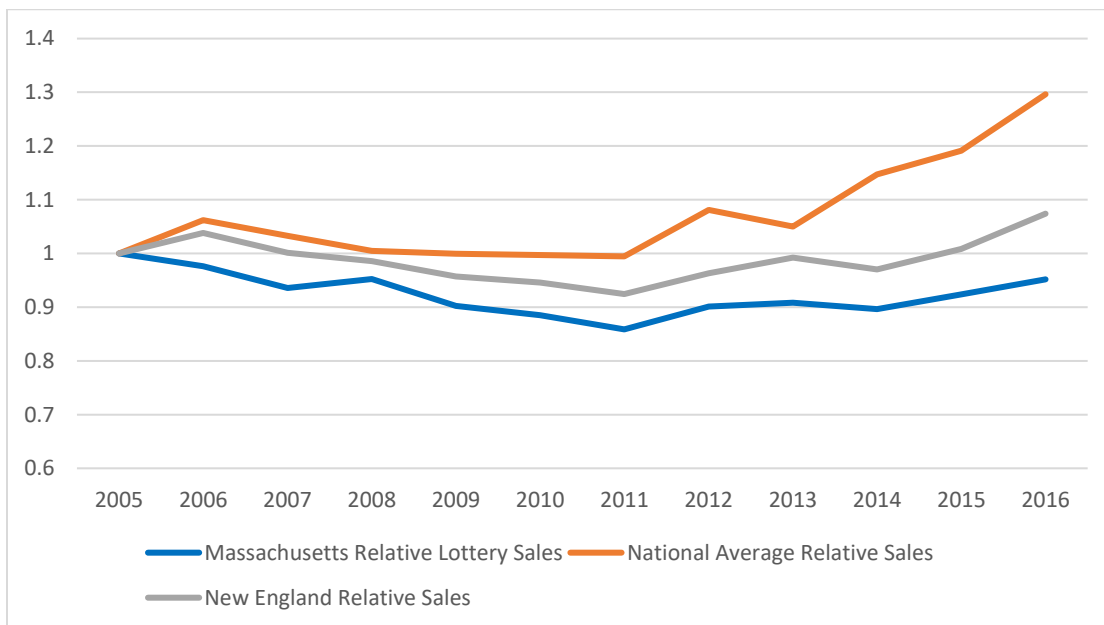
Figure A2: Annual Percent Change in Total Lottery Sales, 2003-2017 (in 2017 Dollars)



Source: MA Lottery and Bureau of Labor Statistics

Figure A3 provides information represented in Figure 4 expressed in real dollars. Sales for Massachusetts, New England, and other states without VLTs that had a lottery in existence since 2005 are included. All sales are relative to sales in fiscal year 2005. Growth in the Massachusetts Lottery has been below that of the other New England States (excluding Rhode Island, which has VLTs) and the national average. Confirming the decline in real lottery sales in Figure A1, relative sales in fiscal year 2016 are below 1 (0.95), indicating real sales below those in fiscal year 2005.

Figure A3: Relative Total Lottery Sales, 2005-2016 (in 2016 Dollars)



Source: LaFleur's World Lottery Almanac, 2005-2017, and Bureau of Labor Statistics. Sales relative to sales in 2005 (2005=1).

Lottery Revenue and Plainridge Park Casino: Two Years of Casino Operation

Dr. Mark W. Nichols
University of Nevada, Reno
May 10, 2018

Overview and Context

- Focus on impact of Plainridge Park Casino (PPC)
- Results presented by:
 - fiscal year data (2003-2016).
 - bi-weekly agent-level sales (year 1 and 2 relative to year prior to opening).
- Analyze sales statewide, in host and surrounding communities, varying distances from casino, and patron origination cities and regions.

Overview of Key Findings

- No large, significant decline in lottery revenue can be attributed to Plainridge Park Casino.
- Lottery sales in Plainville increased ~25% in first year and remained at that level in year 2.

Overview of Key Findings

- Sales in surrounding communities grow more slowly in year 1 and declined in year 2.
- Same is true for agents within 15 minute drive.
- Agents 16-30 minute drive grew more rapidly in year 1 and year 2.
- Over the two-year period, average bi-weekly sales for agents in Plainville and the surrounding communities combined are essentially unchanged compared to year prior to opening.

Lottery Size and Relevance

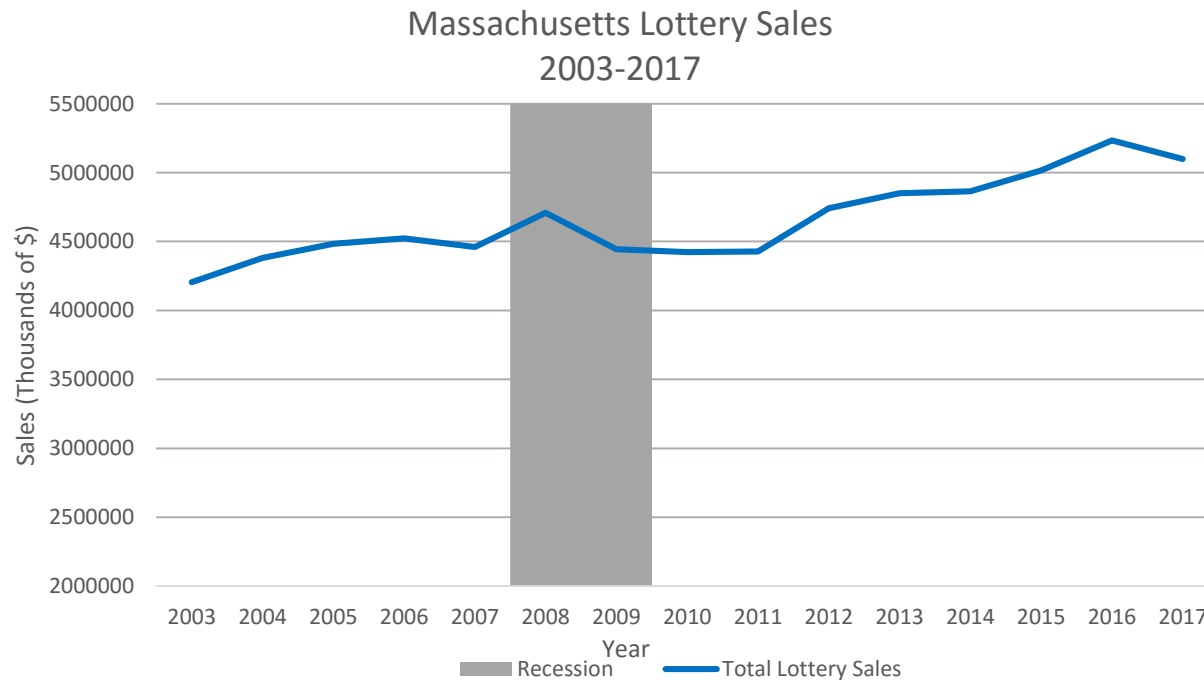
- MA lottery is the largest in country for per capita sales (\$767 in 2016).
- MA pays out 73 cents per dollar; US average is 63 cents.
- Until 2012 (2013), MA lottery revenue exceeded Florida (California).

Lottery Size and Relevance

- Direct Aid from Lottery to casino host communities in FY 17:
 - Plainville: \$729,447 (16.6% of total state aid)
 - Everett: \$6,642,634 (8.8% of total state aid)
 - Springfield: \$36,399,631 (9.7% of total state aid)
- Sales decreased in FY 17, but total profit increased and equaled a record \$1.039 billion.
- Sales in FY 16 were record high to date.

Massachusetts Lottery Trends

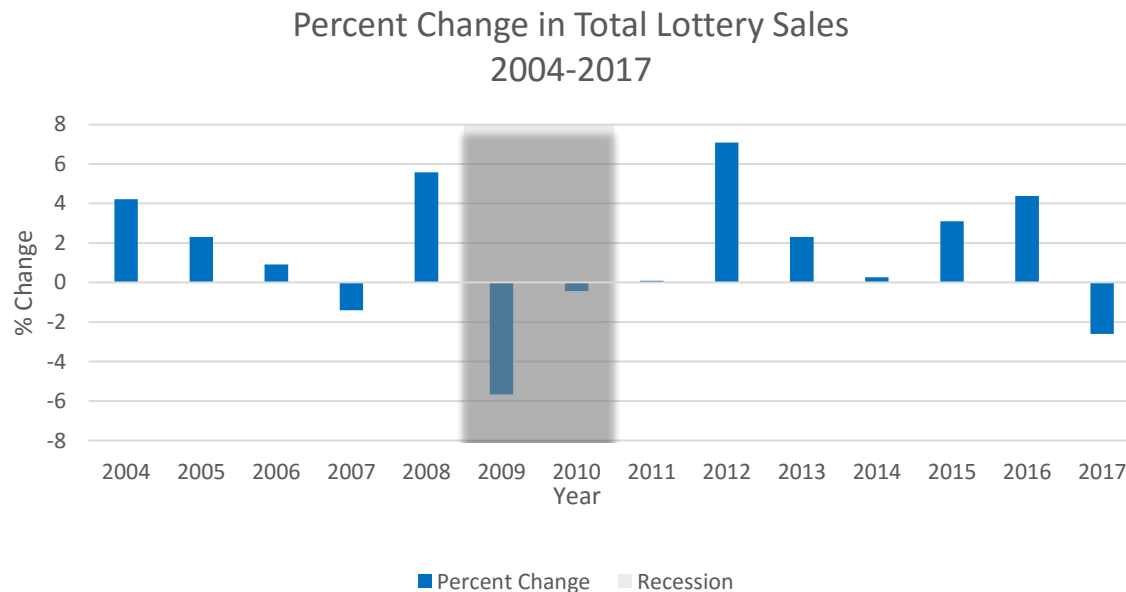
- Average annual growth rate 2003-2017: 1.38%. Not adjusted for inflation.



Nominal Dollars, FY 2003-2017. Source: MA Lottery

Percent Change: Statewide Sales

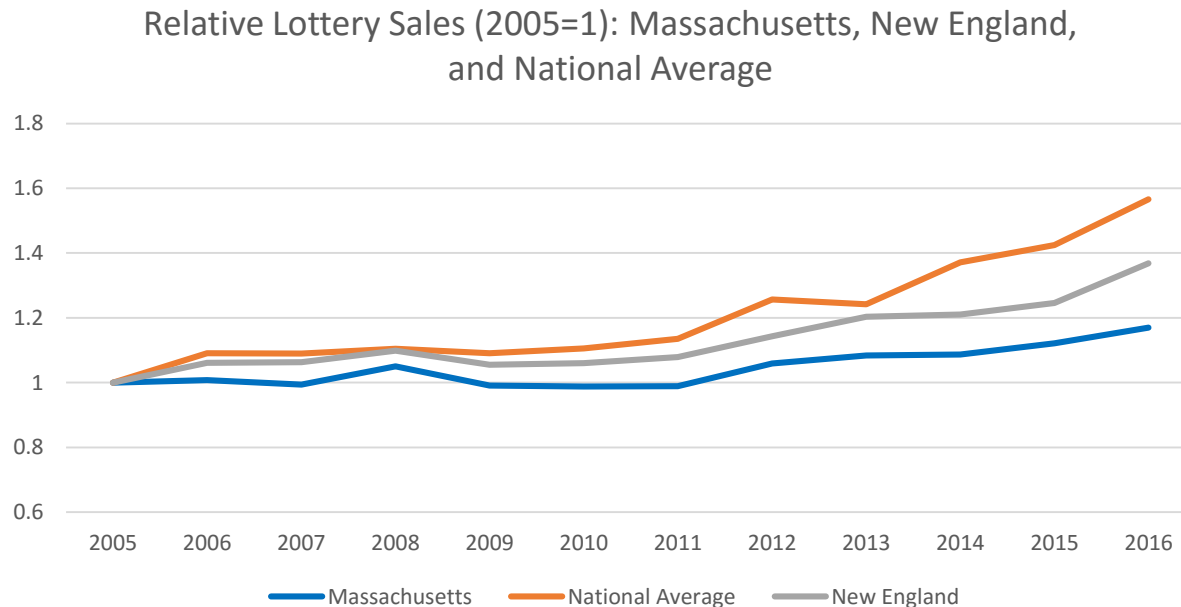
- Lottery revenue is volatile year-to-year. Increased 4.3% in FY 16; decreased 2.6% in FY 17.



Percent Change in Nominal Dollars. Source: MA Lottery

Massachusetts Lottery Trends vs US and New England

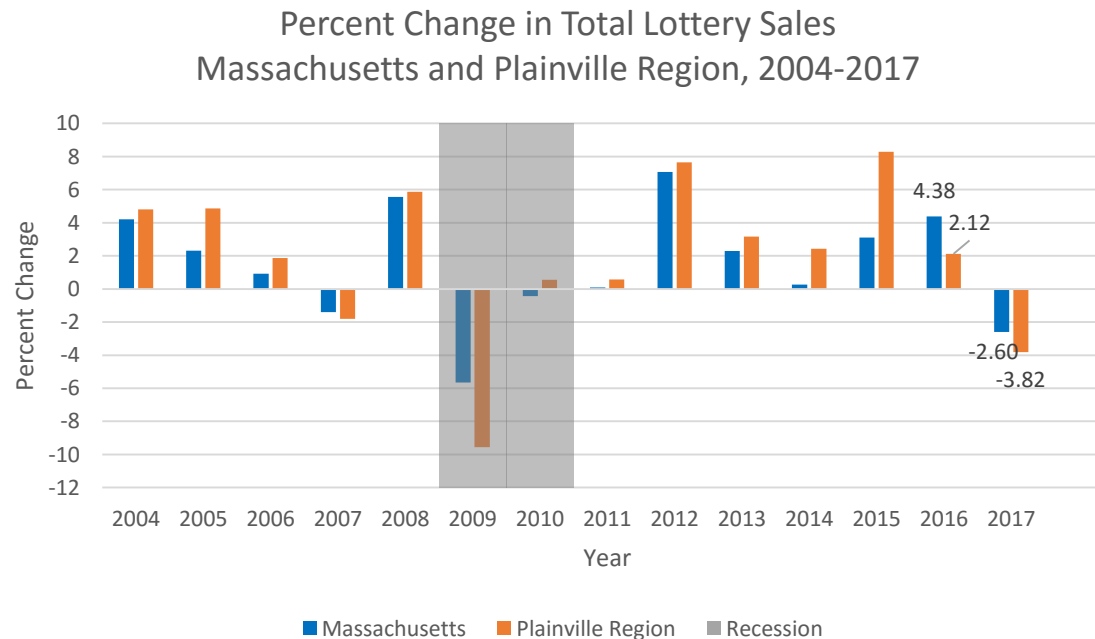
- Lottery sales growth in MA below US and New England since 2005.



Nominal Dollars, FY 2003-2017. Source: MA Lottery

Plainville and Surrounding Communities

- FY Sales in Plainville and surrounding communities grew less (FY 16) or decreased more (FY 17).



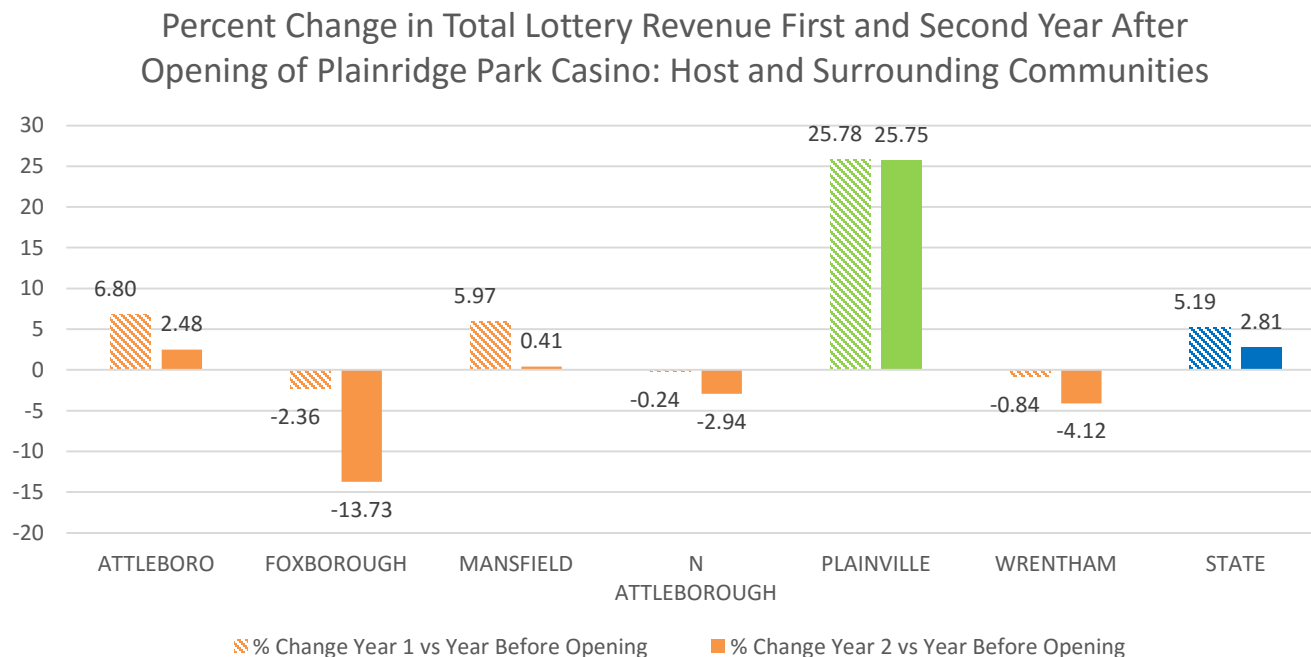
Nominal Dollars, FY 2003-2017. Source: MA Lottery

Weekly Lottery Outlet Data

- MA Lottery providing weekly sales data by agent.
- Unique opportunity to analyze lottery sales by community, driving time, mileage from casino, game, and multiple time periods.
- More accurate pre/post time period than fiscal year.

Change in Plainville and Surrounding Communities (vs year before opening)

- Sales in Plainville increase in year 1 and stay at that level. Surrounding communities mixed (y1), less than state avg. (y2).



Pre and Post PPC Lottery Sales: Plainville and Surrounding Community

- Sales growth in surrounding communities has been below state average

Total Lottery Sales in Surrounding Communities vs Rest of Massachusetts: Pre and Post PPC				
		<i>Year Prior to PPC</i>	<i>1 Year After PPC</i>	<i>2 Years After PPC</i>
Surrounding Communities	Sales (\$)	\$ 90,941,442	\$ 94,218,696	\$ 89,515,317
	% Change from Year Prior to PPC		3.60%	-1.57%
State	Sales (\$)	\$5,020,973,872	\$5,281,590,259	\$5,161,857,754
	% Change from Year Prior to PPC		5.19%	2.81%

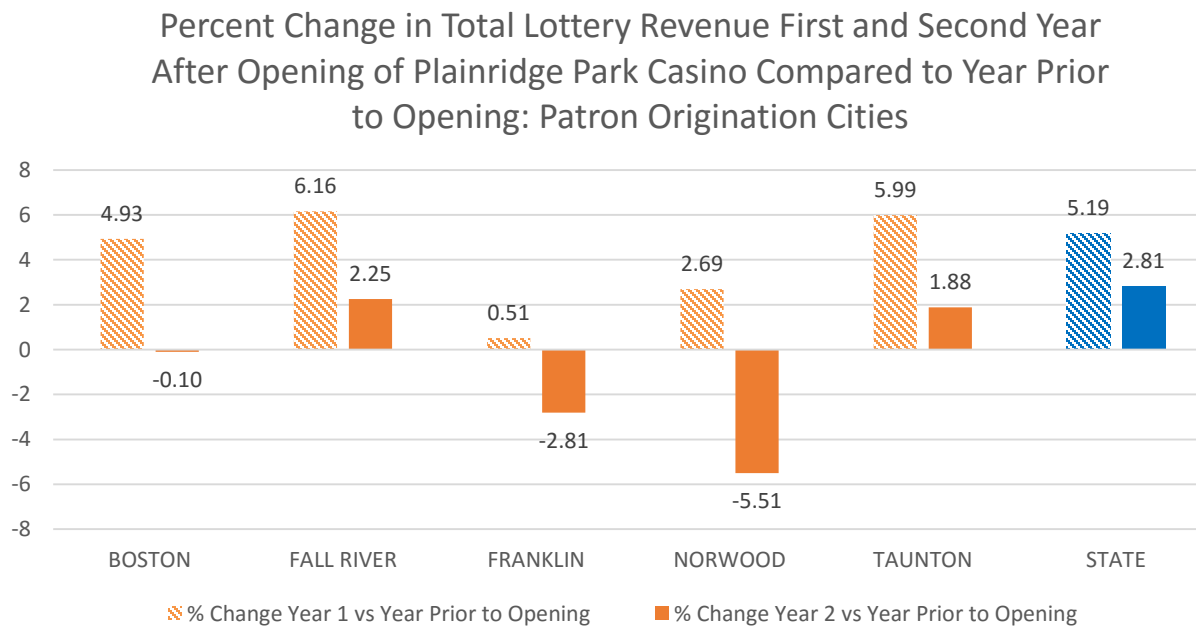
Pre and Post PPC Lottery Sales: Plainville and Surrounding Community

- Year 1 sales in Plainville and surrounding communities slightly above state avg. Year 2 unchanged.

Total Lottery Sales in Plainville and Surrounding Communities vs Rest of Massachusetts: Pre and Post PPC				
		<i>Year Prior to PPC</i>	<i>1 Year After PPC</i>	<i>2 Years After PPC</i>
Plainville + Surrounding Communities	Sales (\$)	\$ 99,374,101	\$ 104,825,013	\$ 100,119,390
	% Change from Year Prior to PPC		5.48%	0.74%
State	Sales (\$)	\$5,020,973,872	\$5,281,590,259	\$5,161,857,754
	% Change from Year Prior to PPC		5.19%	2.81%

Change in Sales for Select Cities

- Cities with most visitors according to patron survey (excluding Plainville and surrounding). Sales growth in year 2 below state avg. Mixed in year 1.



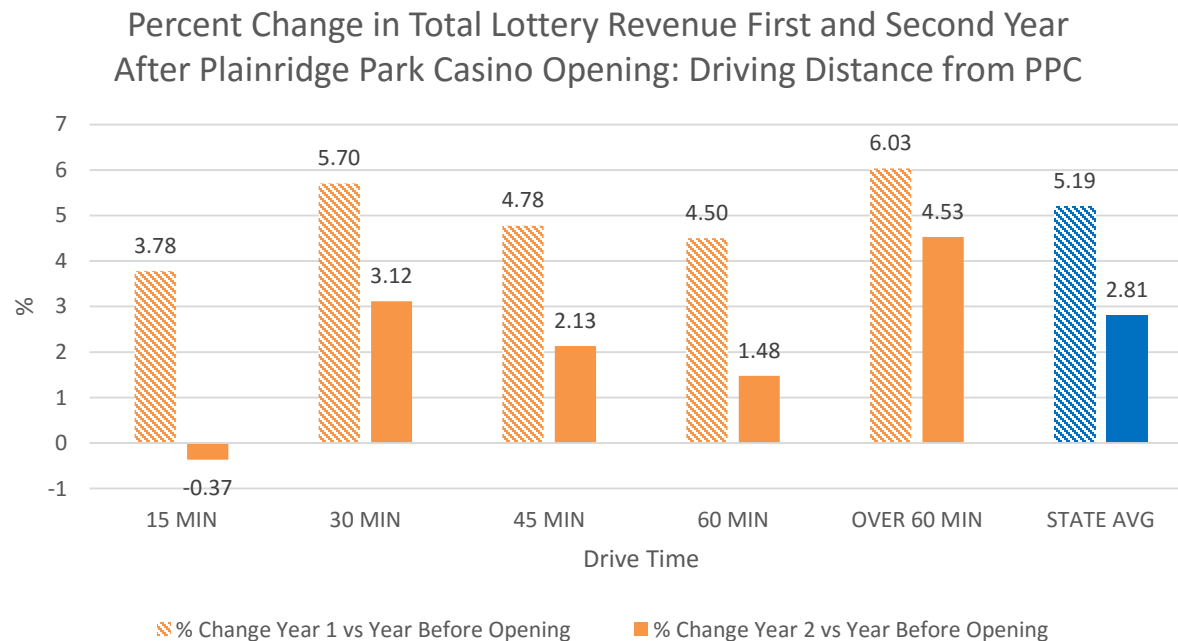
Pre and Post PPC Lottery Sales: Select Cities

- Year 1 sales growth near state avg. Year 2 below.

Total Lottery Sales in Patron Origination Cities vs Rest of Massachusetts: Pre and Post PPC				
		<i>Year Prior to PPC</i>	<i>1 Year After PPC</i>	<i>2 Years After PPC</i>
Patron Origination Cities	Sales (\$)	\$ 724,782,022	\$ 760,395,347	\$ 724,279,754
	% Change from Year Prior to PPC		4.91%	-0.07%
State	Sales (\$)	\$5,020,973,872	\$5,281,590,259	\$5,161,857,754
	% Change from Year Prior to PPC		5.19%	2.81%

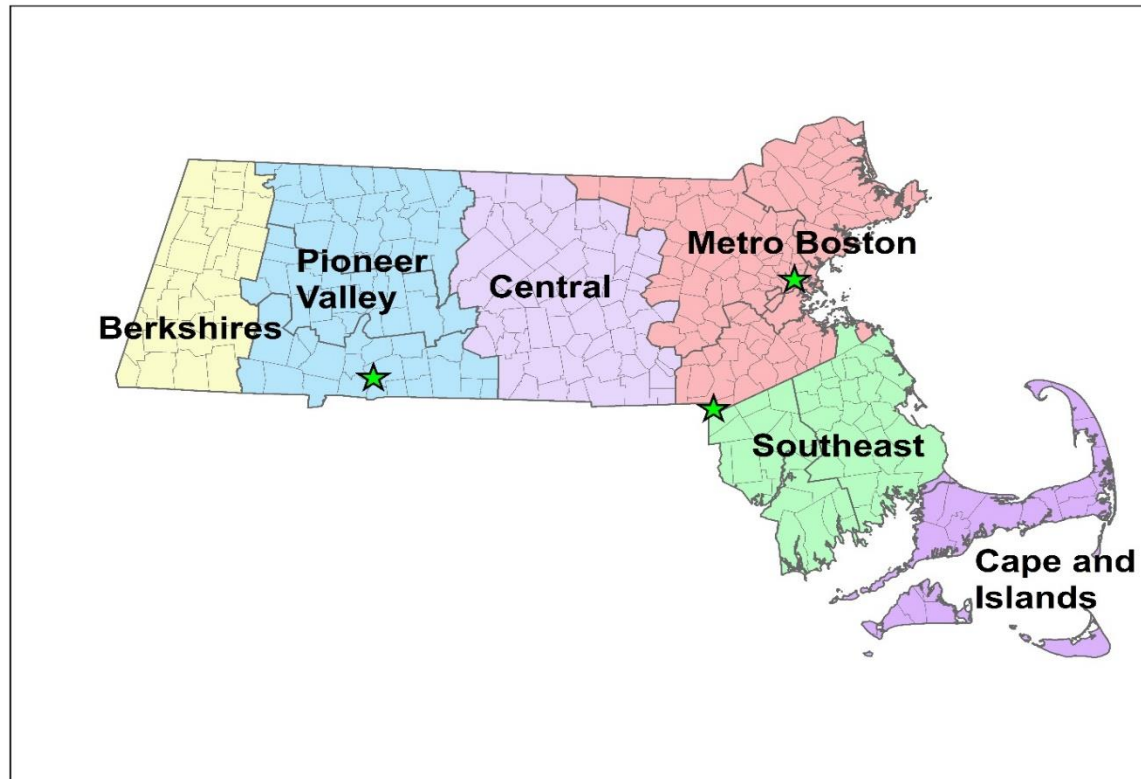
Sales Growth by Drive Time from Plainridge Park Casino

- Sales for agents 0-15 minutes drive away grow slightly less in year 1; decline in year 2; agents with 16-30 minutes grow slightly more.



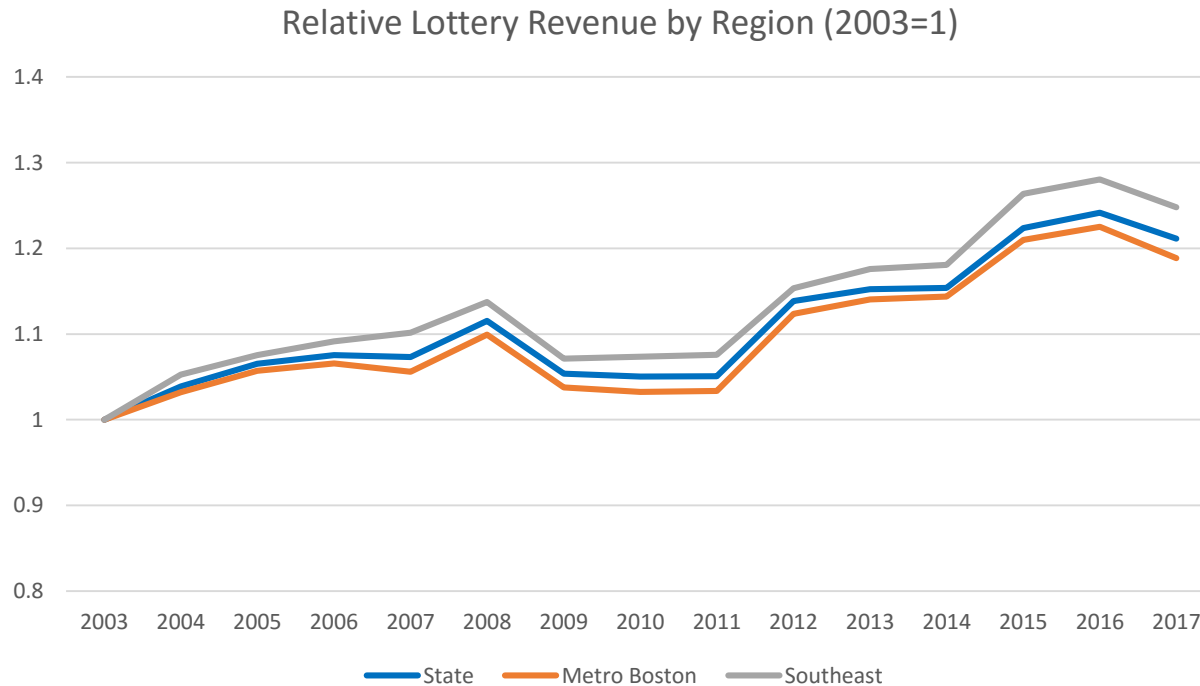
Regional Analysis

- Regions used for Economic Analysis.



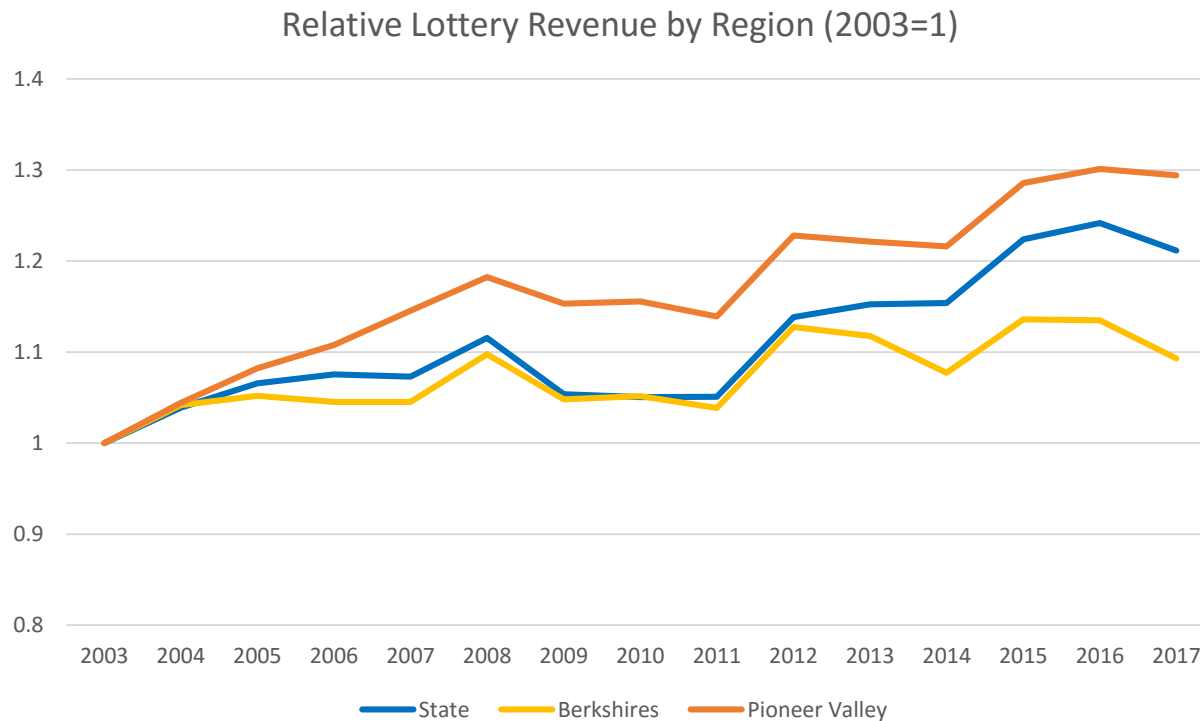
Regional Sales Trends

- Metro Boston and Southeast similar growth to state as whole.



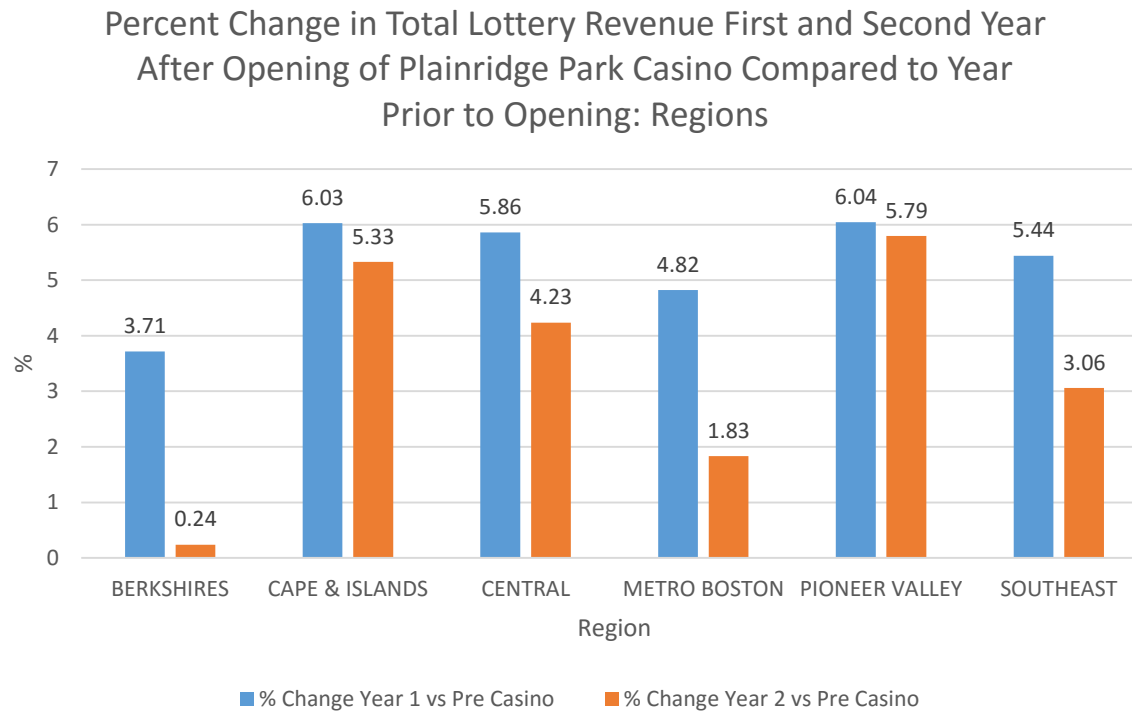
Regional Analysis

- Sales growth in Pioneer Valley exceeds state; Berkshires fall below after 2012.



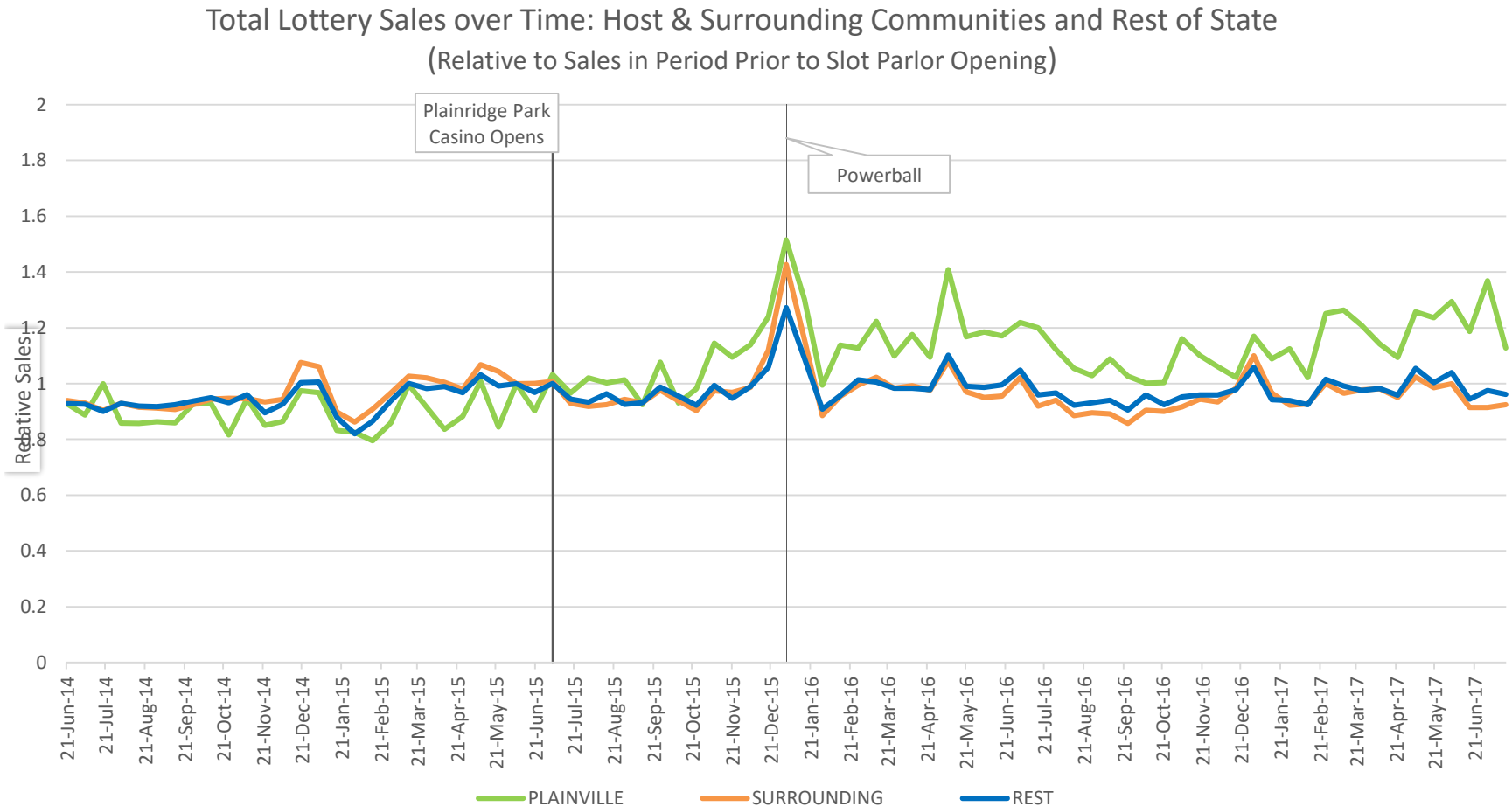
Sales Growth by Region First and Second Year after PPC

- Southeast region growth exceed state avg; Metro Boston similar, but slightly below in years 1 and 2.



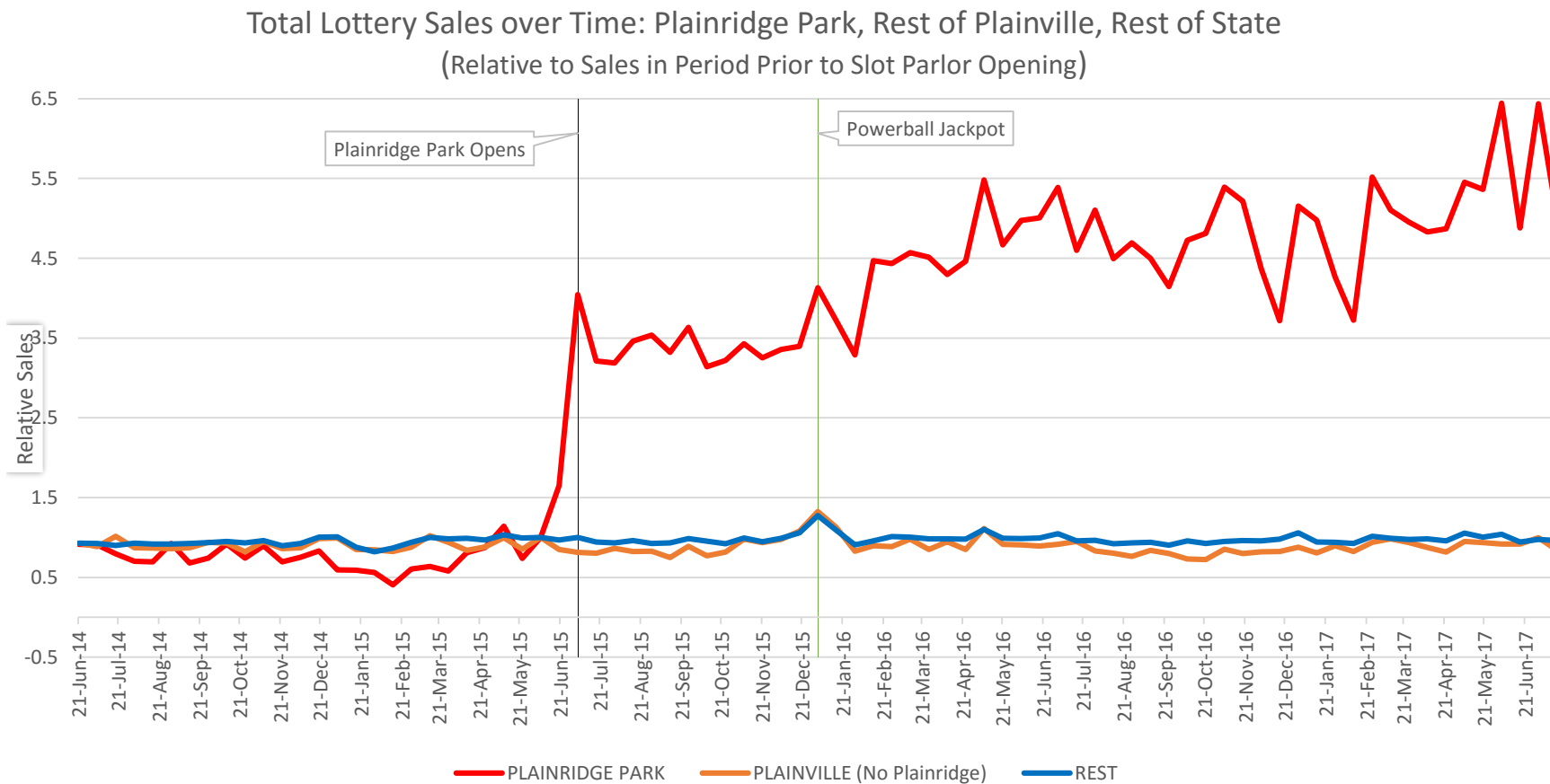
Community Relative Sales Analysis

(Sales relative to period prior to PPC opening)



Plainridge Park Casino Relative Sales Analysis

(Sales relative to period prior to casino opening)



Conclusions

- No clear evidence of a significant decline in lottery revenue attributed to Plainridge Park Casino.
- Lottery revenue at PPC grew significantly in year 1 and remained at that level in year 2.
- Compared to year prior to PPC opening:
 - sales for surrounding communities grew more slowly in year 1 and decreased in year 2 (relative to rest of Massachusetts).
 - Same is true for top 5 patron origination cities and agents within 15 minute drive of PPC.

Conclusions

- Compared to year prior to PPC opening:
 - Change in sales in Plainville and surrounding communities combined slightly higher than rest of Massachusetts in year 1 (5.48% vs 5.19%) but lower in year 2 (0.74% vs 2.19%)
- Gains in Plainville sufficient to offset declines in the surrounding communities, leaving sales essentially unchanged in year 2.
- Sales for agents within 16-30 minute drive exceed state average.

Conclusions

- Short-term impact; results may change over time.
- May be different for casinos in Springfield and Everett.

Future Analysis

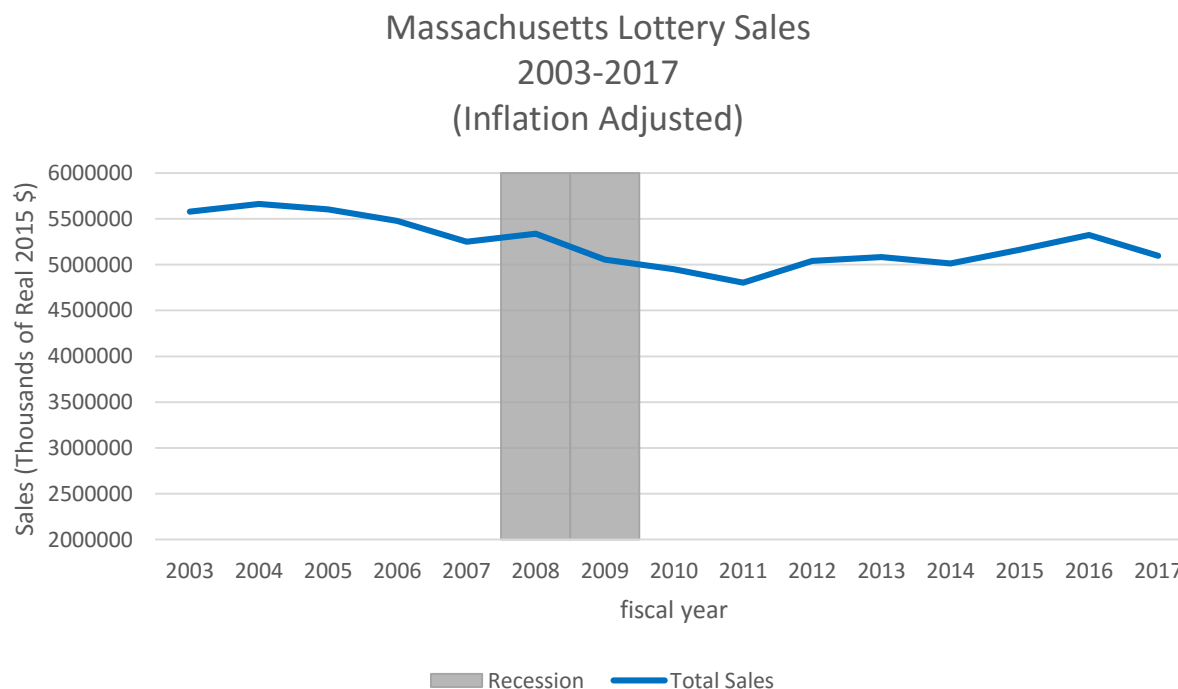
- Continue to analyze PPC
- Analyze impact of casinos in Springfield and Everett (have good pre-casino, weekly data)
- Analyze by various geographies: host, surrounding, distance, visitor cities, regions.
- Combining with patron survey to better determine if lottery expenditures have changed as a result of casino gambling.

Thank You !

Questions?

Massachusetts Lottery Trends

- Real Average annual growth rate 2003-2017: -0.64%. [\(Return\)](#)



Real Dollars, FY 2003-2017. Source: MA Lottery

MASS-AT-A-GLANCE

Valerie Evans

Biostatistician, SEIGMA Project, UMass Amherst

MGC Presentation

Boston, MA

May 10, 2018

Acknowledgements

- SEIGMA project research assistants
 - Zhenning Kang, MS Biostatistics UMass Amherst
- SEIGMA team
 - Rachel Volberg, Principle Investigator
 - Amanda Houpt, former Project Manager
 - Martha Zorn, Data Manager



[Demographics](#)

[Economic Variables](#)

[Social Variables](#)

Data

In addition to the primary data that the SEIGMA Research Team has been collecting since the start of our project, we have also been collecting an enormous amount of publicly available secondary data. These data give us a broader contextual picture of what the state of Massachusetts looks like before and during the introduction of new gambling venues. As a research team, we will use these data to triangulate and add insight into our findings from primary data that we have collected through a series of

Data Spotlight

Rachel Volberg, Principal Investigator of the SEIGMA-MAGIC projects, details findings from a California survey looking at relative risk factors for problem gambling. Find the abstract [here](#). If interested in a full copy, please contact Dr. Volberg

<https://www.umass.edu/seigma/data>

Demographics

Economic Variables

Social Variables

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MASS-AT-A-GLANCE

How to use this application:

Select Municipality

Municipality <

County/MA/US Average <

Select Data to Visualize

Demographics

Social

Economic

Demo Data at a Glance

Age Group

Race Group

Gender

Ethnicity

Full Individual Apps <

Data Source <

Comments or Feedback

Codes on Github

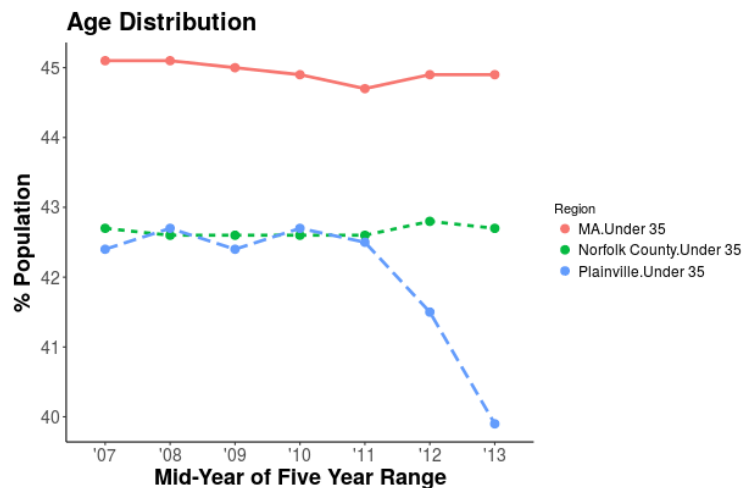
Created by Zhenning Kang



Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

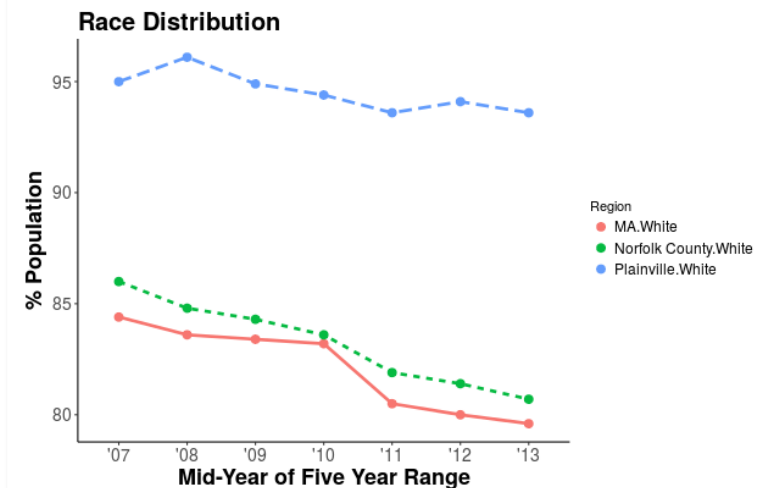
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☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
☐ Age Under 65 ☐ Age 55 to 64



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[1] Region Year variable value  
(8 rows) (66.0-length row names)
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Please Select a Race of Interest

- ☒ White ☐ Black
☐ Hawaiian and Other Pacific Islander (HOPI) ☐ Asian
☐ American Indian and Alaska Native (AIAN) ☐ Others



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[1] Region Year variable value  
(8 rows) (66.0-length row names)
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MASS-AT-A-GLANCE

How to use this application:

Select Municipality

Municipality

County/MA/US Average

Select Data to Visualize

Demographics

Social

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Demo Data at a Glance

Age Group

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Full Individual Apps

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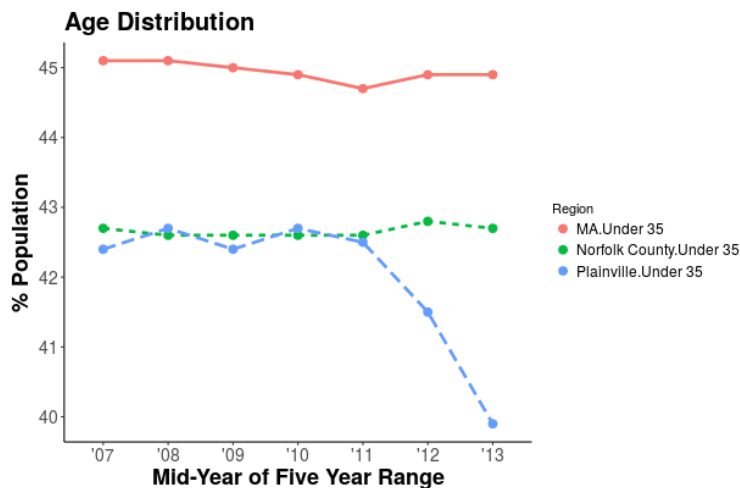
Codes on Github

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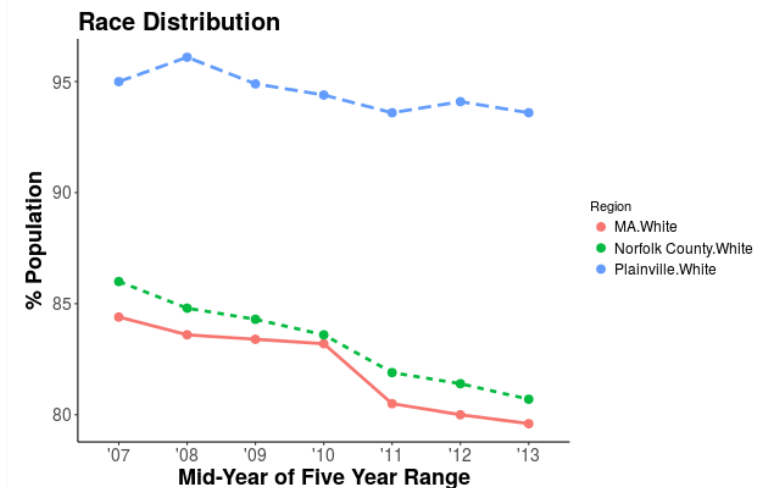
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☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
☐ Age Under 65 ☐ Age 55 to 64



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(8 rows) (66.0-length row names)

Please Select a Race of Interest

- ☒ White ☐ Black
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☐ American Indian and Alaska Native (AIAN) ☐ Others




[1] Region Year variable value
(8 rows) (66.0-length row names)

How to use this application:





Select Municipality


 Municipality <

☒ County/MA/US Average <

Select Data to Visualize

 Demographics

 Social

 Economic

Demo Data at a Glance

Age Group

Race Group

Gender

Ethnicity



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Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ A

☒ Age Under 35

☐ Age 35 to 54

☐ A

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



How to use this application:

1. Select Municipality of Interest

Please choose a municipality by entering it in the text box or selecting it from the pull-down menu on the left sidebar.

- Municipalities are listed in alphabetical order.
- Multiple municipalities can be selected at the same time.
- Use 'backspace' on the keyboard to delete an existing municipality.

2. Choose a Comparison

Please select the corresponding check box to compare the County, Massachusetts, or United States average.

3. Select Data to Visualize

Please select the data of interest by choosing a variable category on the left sidebar.

- Demographics: Age, Race, Gender, Ethnicity, and Population data.
- Social: Marital Status, Educational Attainment, Suicide Rate, Veterans Status, and Schools data.
- Economic: Household Income, Poverty Rate, Monthly Employment, Unemployment Rate, Business and Personal Bankruptcy, Monthly Rent, Building Permits, Property Values, and Tax Levy data.


Data with various categories can be selected through check boxes located at the top of the plot.

Links to full applications for a particular dataset are indicated below each plot as "More information" button.

Close


How to use this application:


Select Municipality


 Municipality <

☒ County/MA/US Average <

Select Data to Visualize

 Demographics

 Social

 Economic

Demo Data at a Glance

Age Group

Race Group

Gender

Ethnicity

SEIGMA



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Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 35 to 64

☒ Age Under 35

☐ Age 35 to 54

☐ Age 55 to 64

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



How to use this application:

Select Municipality

Municipality

Select Municipalities

Plainville

Abington

Acton

Acushnet

Adams

Agawam

Alford

Amesbury

Amherst

Economic

Demo Data at a Glance

Age Group

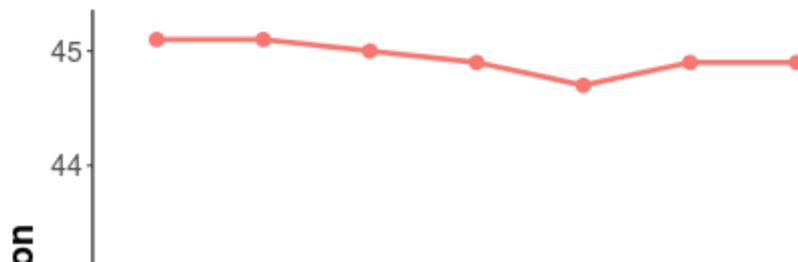
Race Group

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

- ☐ Age Under 20
- ☐ Age 20 to 34
- ☐ Age 35 to 54
- ☐ Age 55 to 64
- ☒ Age Under 35

Age Distribution



Begin
typing or
select from
drop-down
list

How to use this application:

Select Municipality

Municipality

Select Municipalities

Plainville Springfield

- Abington
- Acton
- Acushnet
- Adams
- Agawam
- Alford
- Amesbury
- Amherst

Economic

Demo Data at a Glance

Age Group Race Group

SEIGMA

UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

<input type="checkbox"/> Age Under 20	<input type="checkbox"/> Age 20 to 34	<input type="checkbox"/> Age 35 to 54
<input checked="" type="checkbox"/> Age Under 35	<input type="checkbox"/> Age 35 to 54	<input type="checkbox"/> Age 55 to 64
<input type="checkbox"/> Age Under 65	<input type="checkbox"/> Age 55 to 64	

Age Distribution

on 50

Reg

SEIGMA SOCIAL AND ECONOMIC IMPACTS OF GAMBLING IN MASSACHUSETTS UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

How to use this application:

Select Municipality

Municipality <

☒ County/MA/US Average <

Select Data to Visualize

Demographics

Social

Economic

Demo Data at a Glance

Age Group Race Group

Gender Ethnicity

SEIGMA

UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest


<input type="checkbox"/> Age Under 20	<input type="checkbox"/> Age 20 to 34	<input type="checkbox"/> Age 35 to 64
<input checked="" type="checkbox"/> Age Under 35	<input type="checkbox"/> Age 35 to 54	<input type="checkbox"/> Age 55 to 64
<input type="checkbox"/> Age Under 65	<input type="checkbox"/> Age 55 to 64	

Age Distribution

The line graph shows a red line with circular markers at each data point. The y-axis is labeled 'in' and has tick marks at 44 and 45. The x-axis is not labeled. The data points are approximately at (1, 45.2), (2, 45.2), (3, 45.0), (4, 44.8), (5, 44.5), (6, 44.8), and (7, 44.8).

How to use this application:

Select Municipality

 Municipality <


☒ County/MA/US Average ▾


☐ Compare to County Average


☒ Compare to MA Average

☐ Compare to US Average

Select Data to Visualize

 Demographics

 Social

 Economic



UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 35 to 64

☒ Age Under 35

☐ Age 35 to 54

☐ Age 55 to 64

☐ Age Under 65

☐ Age 55 to 64


Age Distribution



Check all
or none


How to use this application:


Select Municipality


 Municipality <

☒ County/MA/US Average <

Select Data to Visualize

 Demographics

 Social

 Economic

Demo Data at a Glance

Age Group

Race Group

Gender

Ethnicity



UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ A

☒ Age Under 35

☐ Age 35 to 54

☐ A

☐ Age Under 65

☐ Age 55 to 64


Age Distribution



Changes
data tabs


How to use this application:


Select Municipality


 Municipality <

☒ County/MA/US Average <

Select Data to Visualize

 Demographics

 Social

 Economic

Demo Data at a Glance

Age Group

Race Group

Gender

Ethnicity



UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

- | | | |
|--|---------------------------------------|---------------------------------------|
| <input type="checkbox"/> Age Under 20 | <input type="checkbox"/> Age 20 to 34 | <input type="checkbox"/> Age 35 to 64 |
| <input checked="" type="checkbox"/> Age Under 35 | <input type="checkbox"/> Age 35 to 54 | <input type="checkbox"/> Age 55 to 64 |
| <input type="checkbox"/> Age Under 65 | <input type="checkbox"/> Age 55 to 64 | |

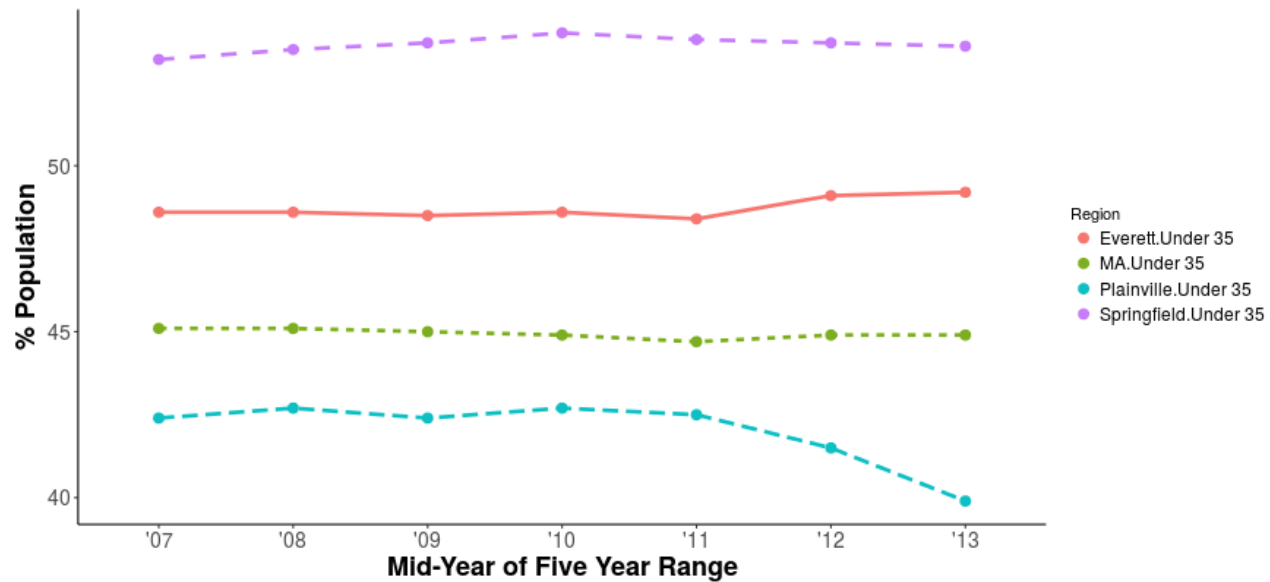
Age Distribution



Pop up
windows

How to use this application:

Age Distribution



Close


Age Group


Race Group


Gender

Ethnicity

Select Data to Visualize

 Demographics

 Social

 Economic


Demo Data at a Glance


Age Group


Race Group


Gender

Ethnicity

 Full Individual Apps <

 Data Source <

 Comments or Feedback

 Codes on Github

Created by Zhenning Kang

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ A

☒ Age Under 35

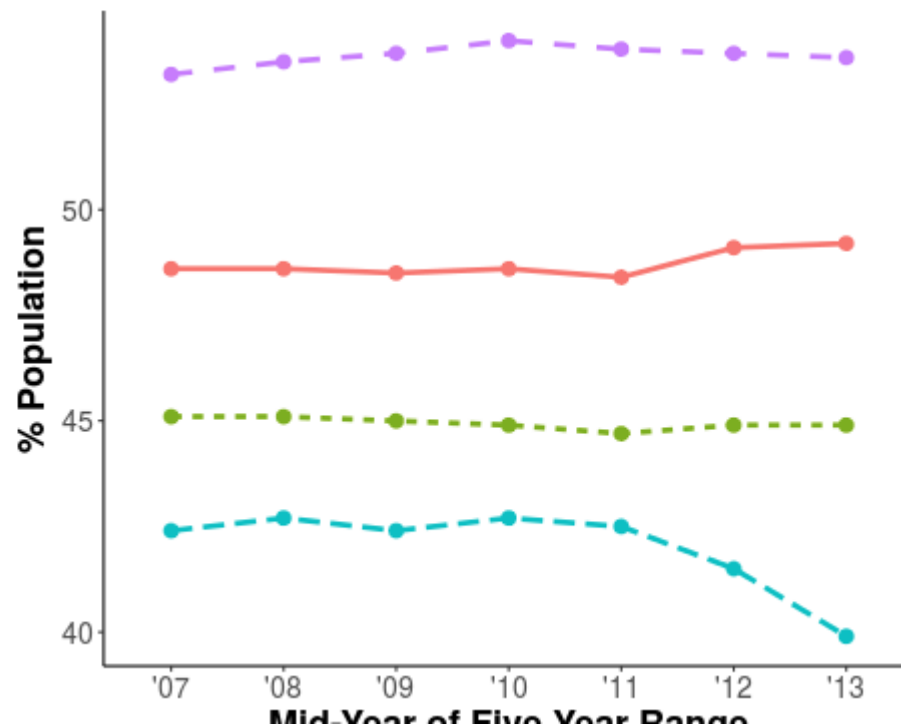
☐ Age 35 to 54

☐ A

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



Select Data to Visualize

 Demographics

 Social

 Economic

Demo Data at a Glance

Age Group

Race Group

Gender

Ethnicity

 Full Individual Apps

 Data Source

 Comments or Feedback

 C

List of full apps for
individual data sets


Created by Zhenning Kang

Please S

☐ Age U

☒ Age U

☐ Age U

 Full Individual Apps

- » Bankruptcy
- » Building Permits
- » Demographics
- » Educational Attainment
- » Employment
- » Household Income
- » Marital Status
- » Poverty
- » Property Tax
- » Property Value
- » Rent
- » School
- » Suicide
- » Unemployment
- » Veteran Status

☐ A

☐ A

% Population

50

45

40

'07

'08

'09

'10


'11


'12


'13

Mid-Year of Five Year Range

Select Data to Visualize

 Demographics

 Social

 Economic


Demo Data at a Glance


Age Group


Race Group


Gender

Ethnicity

 Full Individual Apps <

 Data Source <

 Comments or Feedback

 Codes on Github

Created by Zhenning Kang

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ A

☒ Age Under 35

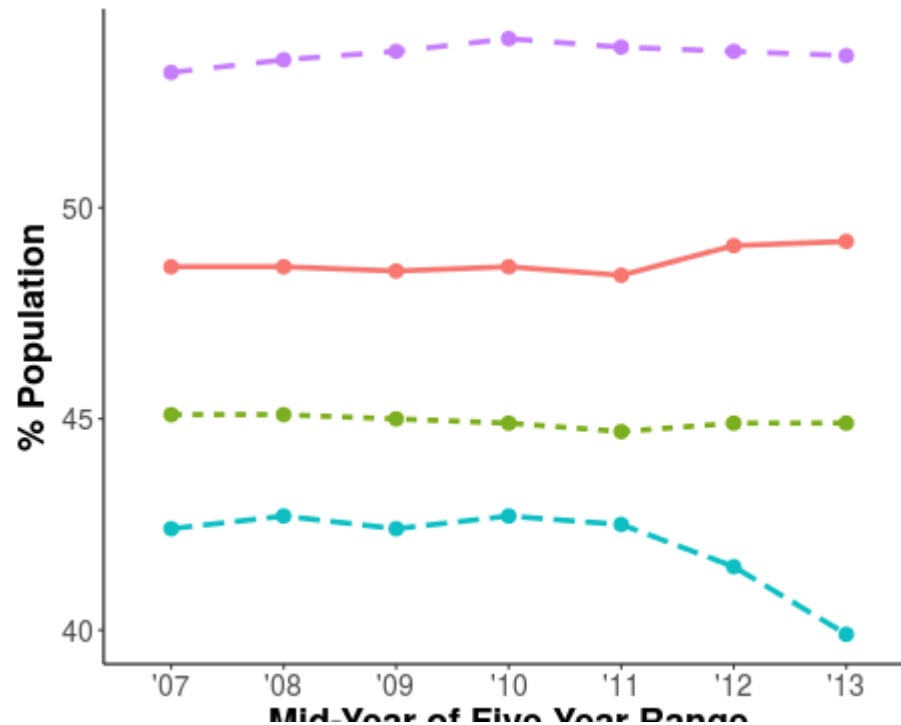
☐ Age 35 to 54

☐ A

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



Select Data to Visualize

 Demographics

 Social

 Economic

Demo Data at a Glance

Age Group

Race Group

Gender

Ethnicity

 Full Individual Apps <

 Data Source <

List of data sources
used to create apps

Created by Zhenning Kang

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ A


☒ Age Under 35

☐ Age 35 to 54

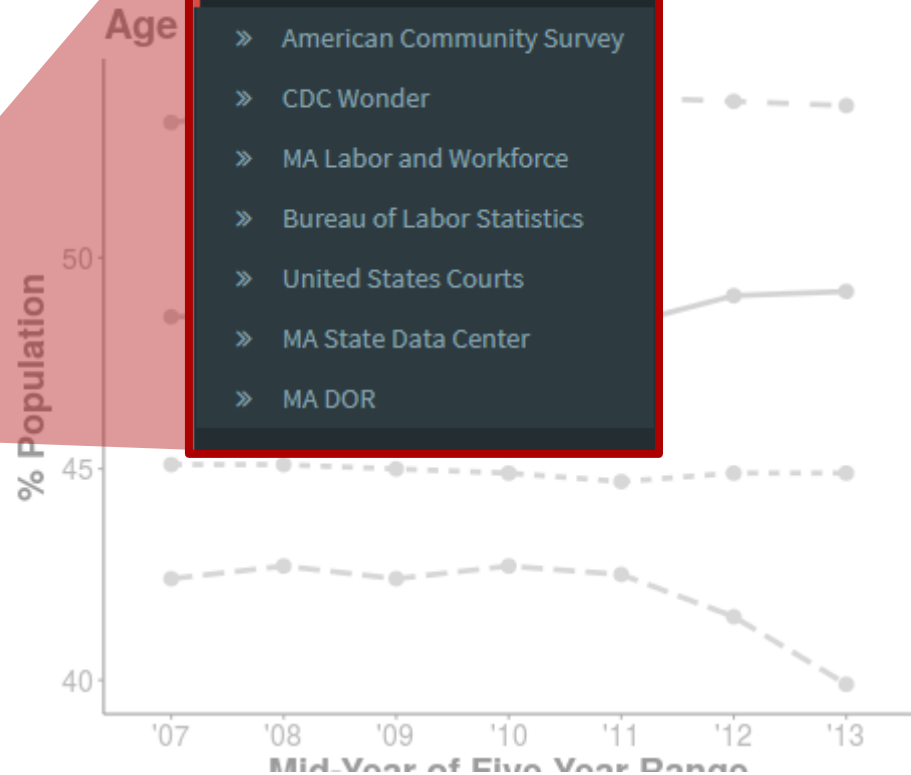
☐ A

☐ Age Under 65


☐ Age 55 to 64


 Data Source


- » American Community Survey
- » CDC Wonder
- » MA Labor and Workforce
- » Bureau of Labor Statistics
- » United States Courts
- » MA State Data Center
- » MA DOR



Select Data to Visualize

 Demographics

 Social

 Economic


Demo Data at a Glance


Age Group


Race Group


Gender

Ethnicity

 Full Individual Apps <

 Data Source <

 Comments or Feedback

 Codes on Github

Created by Zhenning Kang

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ A

☒ Age Under 35

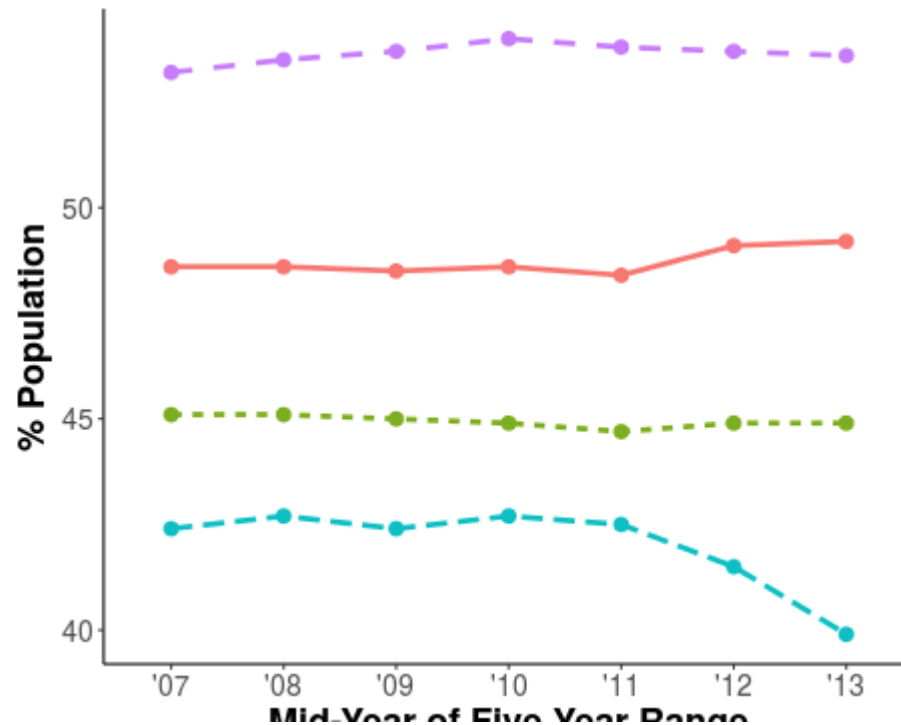
☐ Age 35 to 54

☐ A


☐ Age Under 65


☐ Age 55 to 64


Age Distribution



Select Data to Visualize

 Demographics

 Social

 Economic


Demo Data at a Glance


Age Group


Race Group


Gender

Ethnicity

 Full Individual Apps <

 Data Source <

 Comments or Feedback

 Codes on Github

Created by Zhenning Kang

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ A

☒ Age Under 35

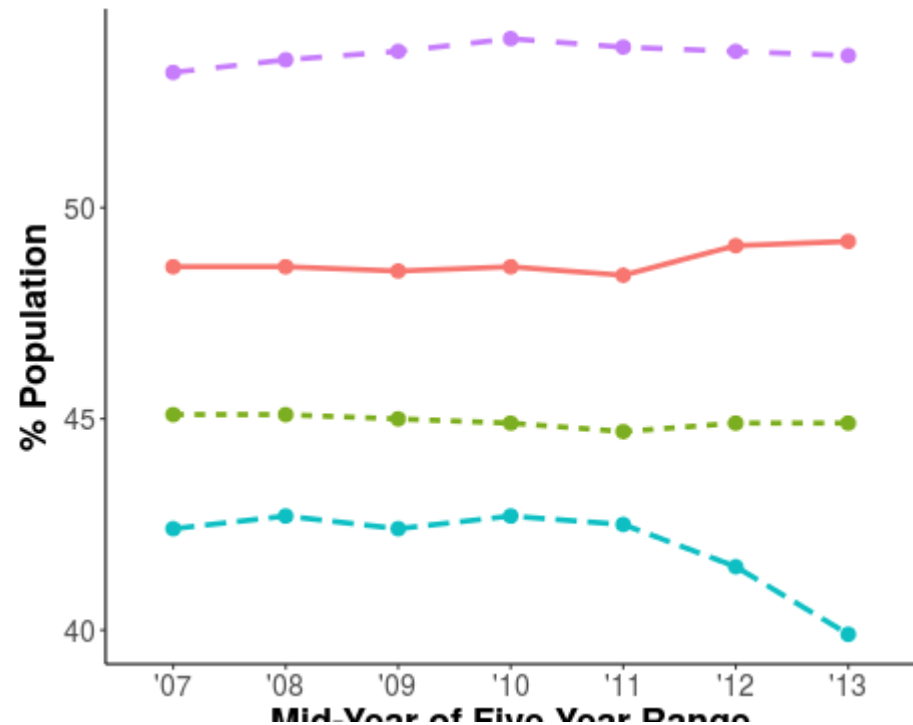
☐ Age 35 to 54

☐ A

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



Our master coder!

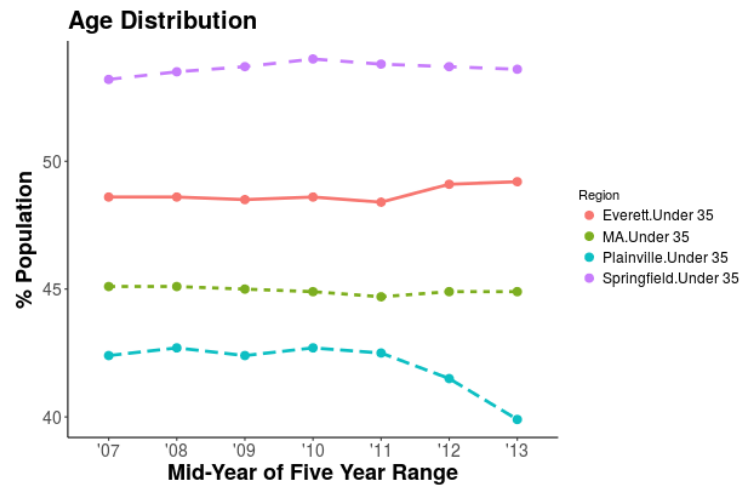
MASS-AT-GLANCE

SEIGMA SOCIAL AND ECONOMIC IMPACTS
OF GAMBLING IN MASSACHUSETTS
UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

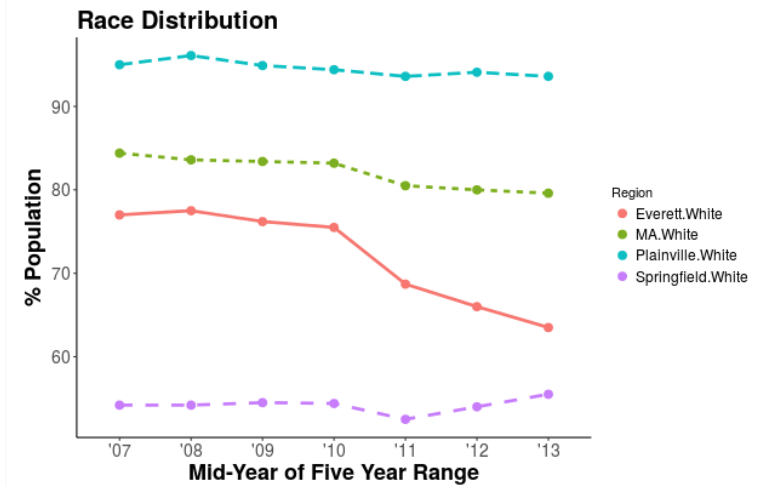
- ☐ Age Under 20
- ☐ Age 20 to 34
- ☐ Age 65 to 74
- ☒ Age Under 35
- ☐ Age 35 to 54
- ☐ Age Over 75
- ☐ Age Under 65
- ☐ Age 55 to 64



[1] Region Year variable value
<0 rows> (or 0-length row names)

Please Select a Race of Interest

- ☒ White
- ☐ Black
- ☐ Hawaiian and Other Pacific Islander (HOPI)
- ☐ Asian
- ☐ American Indian and Alaska Native (AIAN)
- ☐ Others



[1] Region Year variable value
<0 rows> (or 0-length row names)

MASS-AT-A-GLANCE

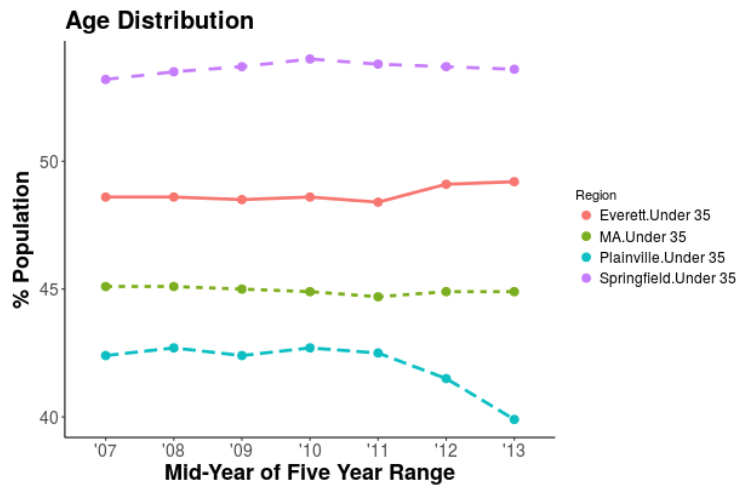


UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

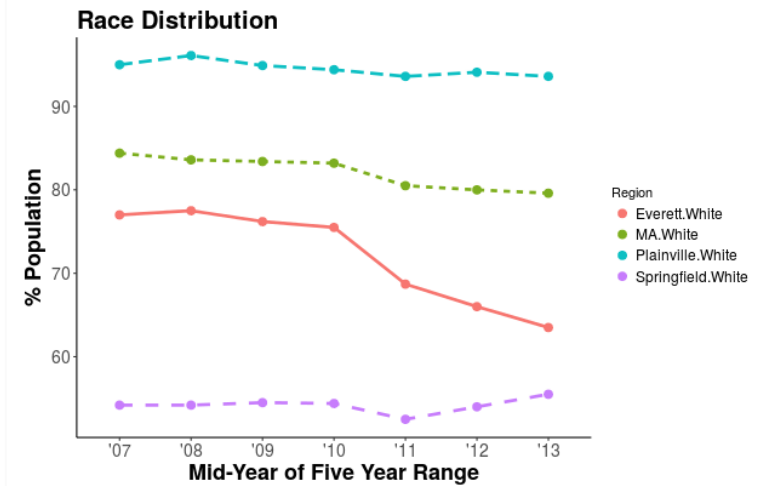
- ☐ Age Under 20
- ☐ Age 20 to 34
- ☐ Age 65 to 74
- ☒ Age Under 35
- ☐ Age 35 to 54
- ☐ Age Over 75
- ☐ Age Under 65
- ☐ Age 55 to 64



[1] Region Year variable value
<0 rows> (or 0-length row names)

Please Select a Race of Interest

- ☒ White
- ☐ Black
- ☐ Hawaiian and Other Pacific Islander (HOPI)
- ☐ Asian
- ☐ American Indian and Alaska Native (AIAN)
- ☐ Others



[1] Region Year variable value
<0 rows> (or 0-length row names)

MASS-AT-A-GLANCE

Population estimates can be found at the bottom of the page.

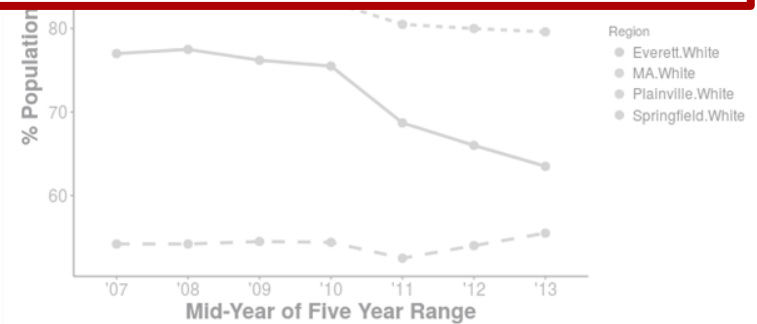
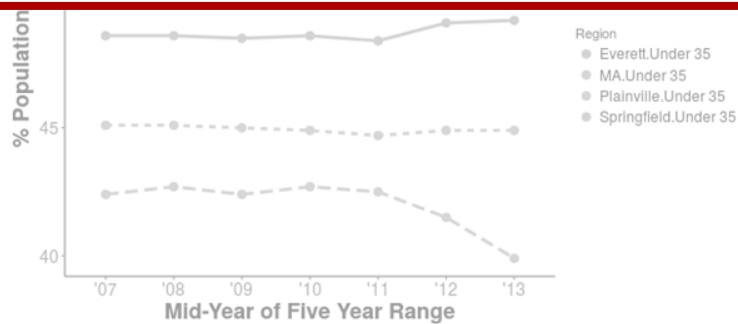
Total Population in Selected Regions (Five Year Range)

Show entries

Region	2005-2009	2006-2010	2007-2011	2008-2012	2009-2013	2010-2014	2011-2015
Plainville	8,167	8,091	8,176	8,278	8,429	8,581	8,735
Springfield	153,170	152,906	152,992	153,278	153,428	153,836	153,947
Everett	37,525	40,560	41,079	41,621	42,092	42,758	43,885
MA	6,511,176	6,477,096	6,512,227	6,560,595	6,605,058	6,657,291	6,705,586

Showing 1 to 4 of 4 entries

Previous **1** Next



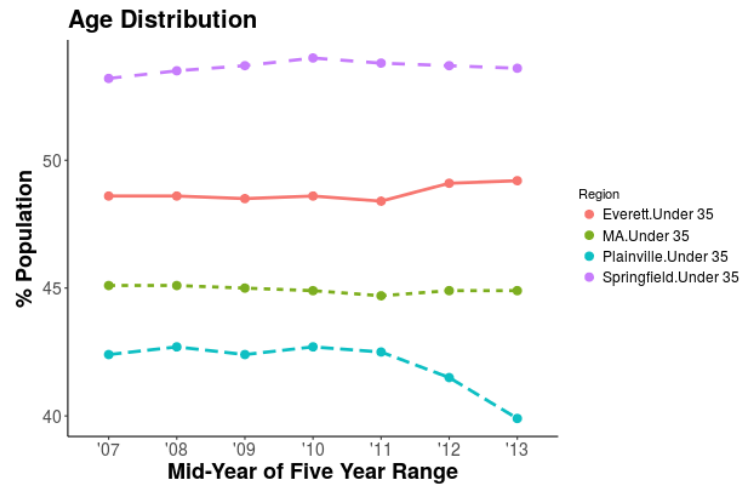
MASS-AT-A-GLANCE



Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

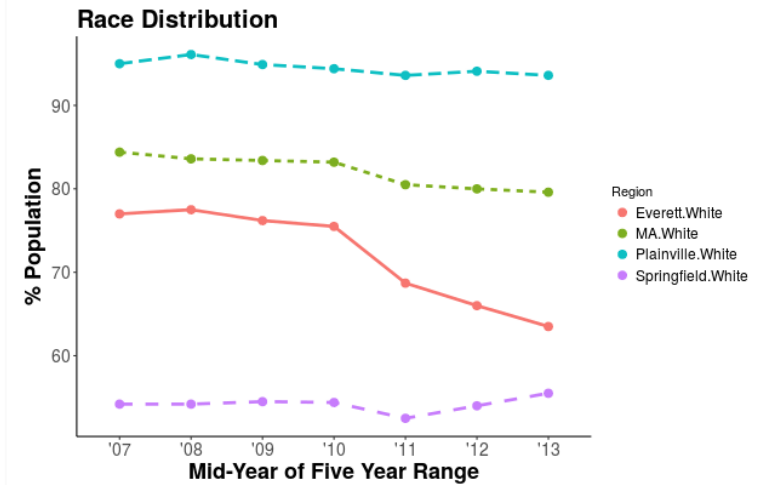
- ☐ Age Under 20
- ☐ Age 20 to 34
- ☐ Age 65 to 74
- ☒ Age Under 35
- ☐ Age 35 to 54
- ☐ Age Over 75
- ☐ Age Under 65
- ☐ Age 55 to 64



[1] Region Year variable value
<0 rows> (or 0-length row names)

Please Select a Race of Interest

- ☒ White
- ☐ Black
- ☐ Hawaiian and Other Pacific Islander (HOPI)
- ☐ Asian
- ☐ American Indian and Alaska Native (AIAN)
- ☐ Others



[1] Region Year variable value
<0 rows> (or 0-length row names)

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 65 to 74

☒ Age Under 35

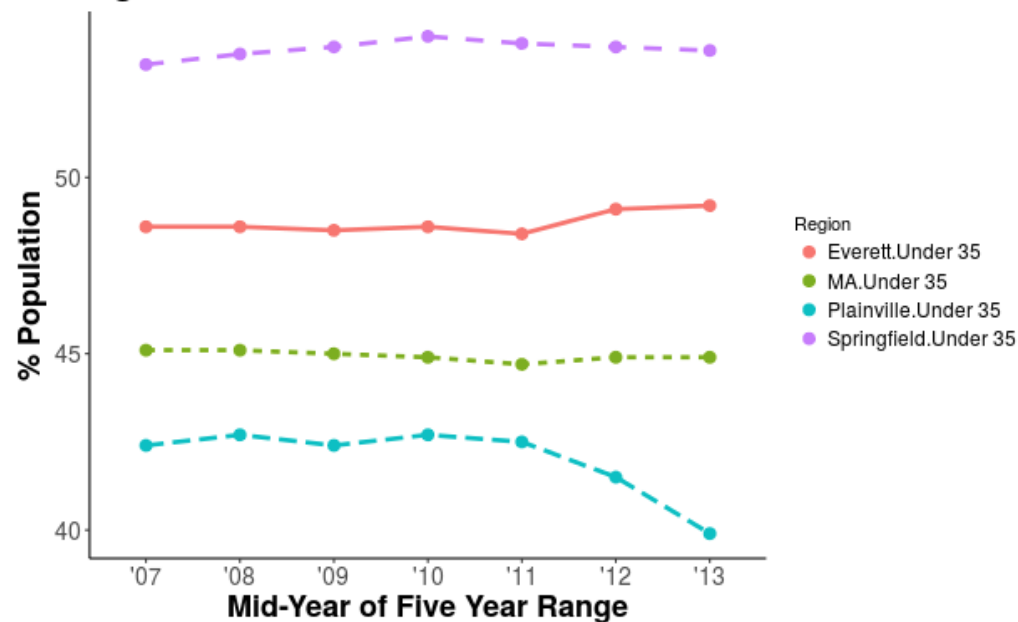
☐ Age 35 to 54

☐ Age Over 75

☐ Age Under 65


☐ Age 55 to 64

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

 Download the plot

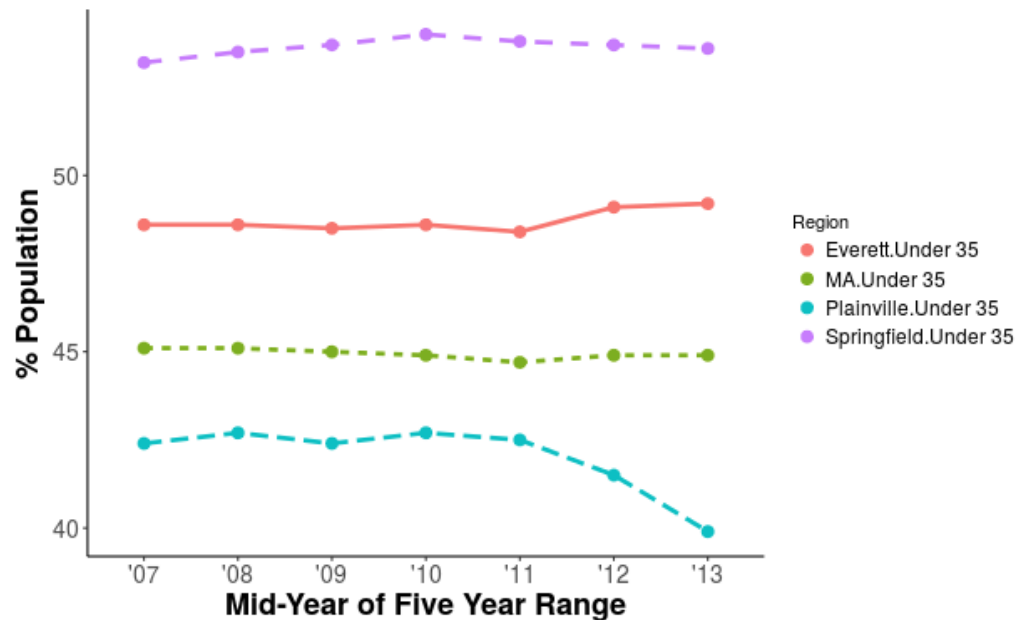


Check boxes allow
for selection of
multiple categories

Please Select an Age of Interest

- | | | |
|--|---------------------------------------|---------------------------------------|
| <input type="checkbox"/> Age Under 20 | <input type="checkbox"/> Age 20 to 34 | <input type="checkbox"/> Age 65 to 74 |
| <input checked="" type="checkbox"/> Age Under 35 | <input type="checkbox"/> Age 35 to 54 | <input type="checkbox"/> Age Over 75 |
| <input type="checkbox"/> Age Under 65 | <input type="checkbox"/> Age 55 to 64 | |

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

Download the plot

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 65 to 74

☒ Age Under 35

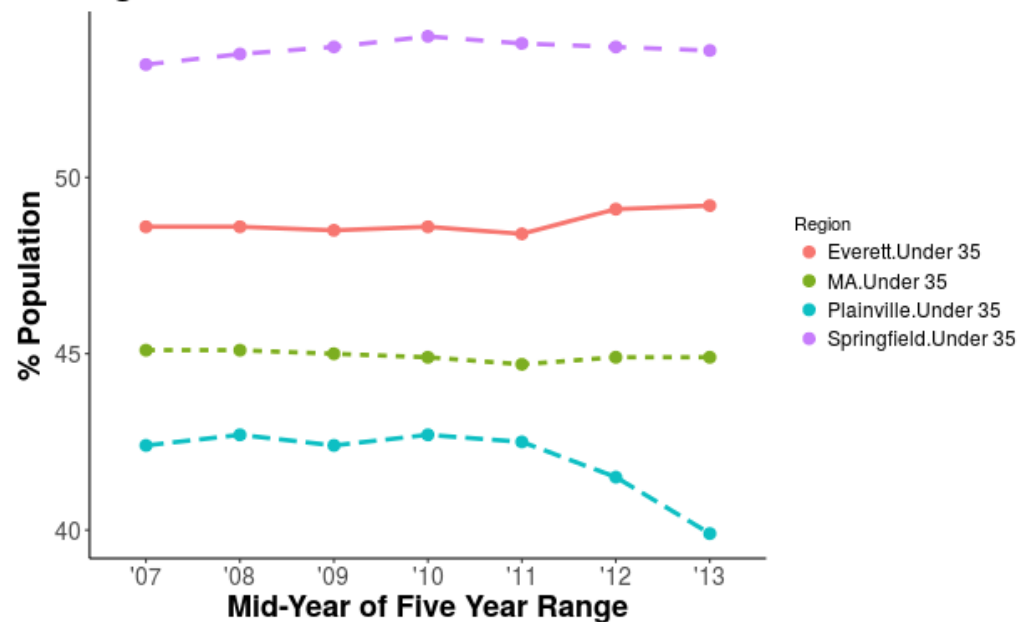
☐ Age 35 to 54

☐ Age Over 75

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

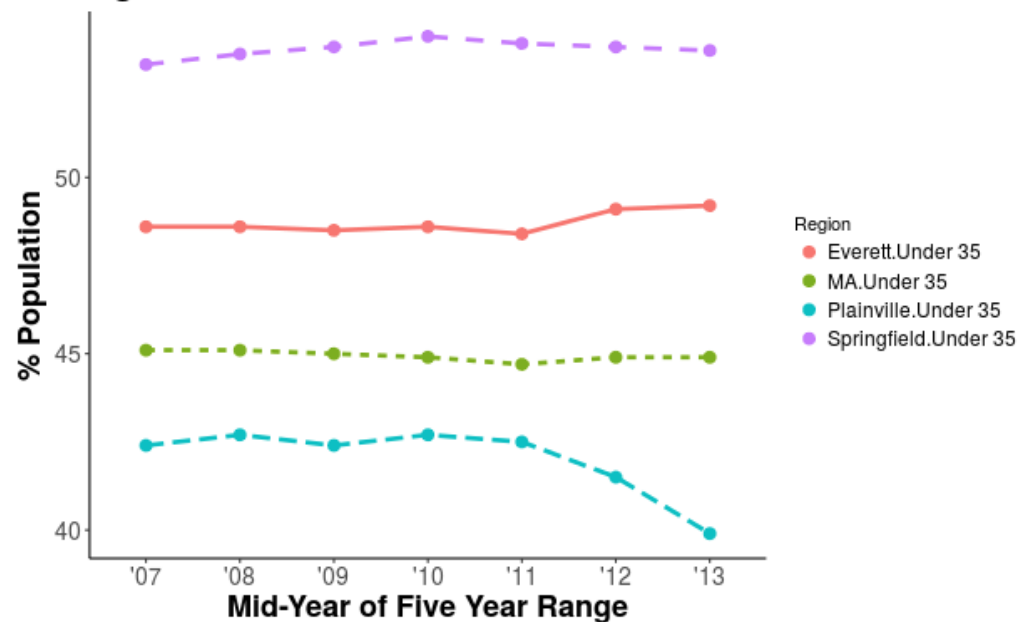
Download the plot

Plot shows all
data selections:
municipalities,
comparisons,
check boxes

Please Select an Age of Interest

- ☐ Age Under 20 ☐ Age 20 to 34 ☐ Age 65 to 74
☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
☐ Age Under 65 ☐ Age 55 to 64

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

Download the plot

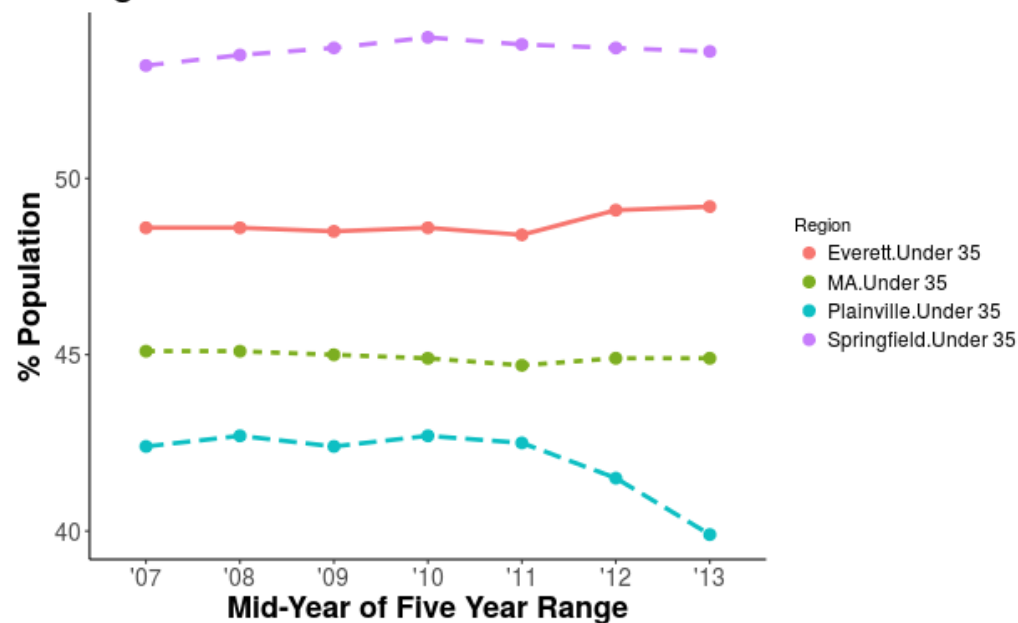
→ This plot presents data as % population. Others might provide counts, dollars, or rates.

The y-axes are dynamic. They will adjust to best visualize the data.

Please Select an Age of Interest

- ☐ Age Under 20 ☐ Age 20 to 34 ☐ Age 65 to 74
☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
☐ Age Under 65 ☐ Age 55 to 64

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

Download the plot

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 65 to 74

☒ Age Under 35

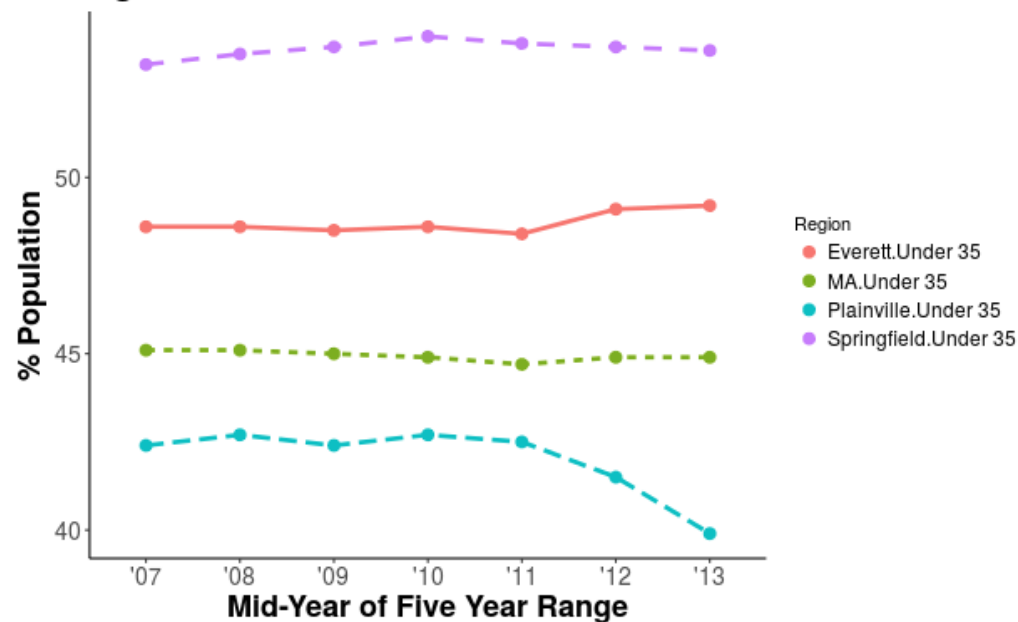
☐ Age 35 to 54

☐ Age Over 75

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

[Download the plot](#)

For example, '08
represents data
from 2006-2010

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 65 to 74

☒ Age Under 35

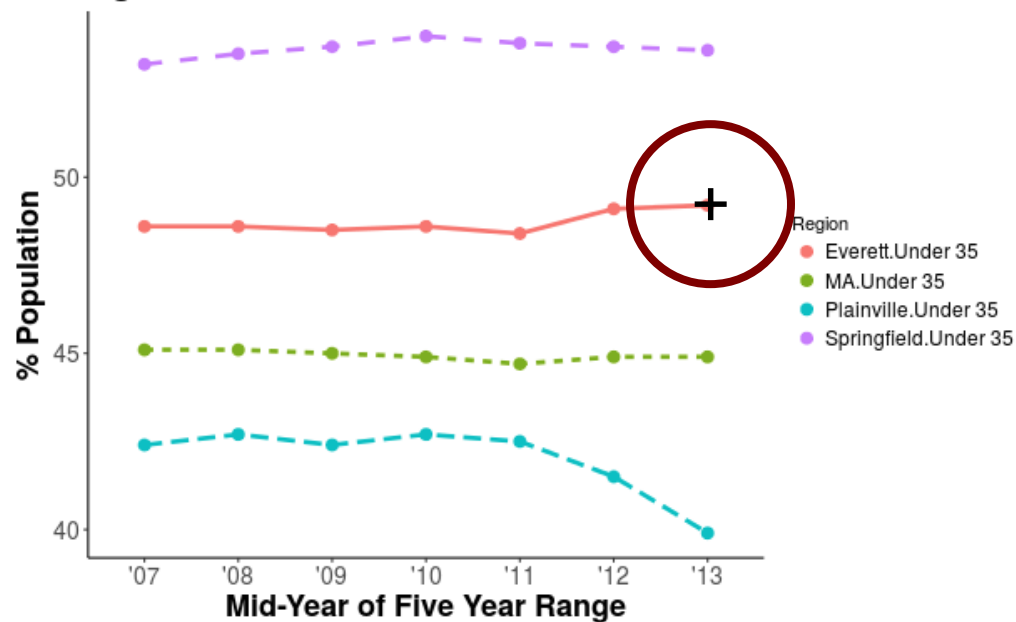
☐ Age 35 to 54

☐ Age Over 75

☐ Age Under 65

☐ Age 55 to 64

Age Distribution



Region Year variable value
27 Everett '13 Under 35 49.2

What is the Age variable?

Download the plot

Choose a point in
the graph to get
specific data

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 65 to 74

☒ Age Under 35

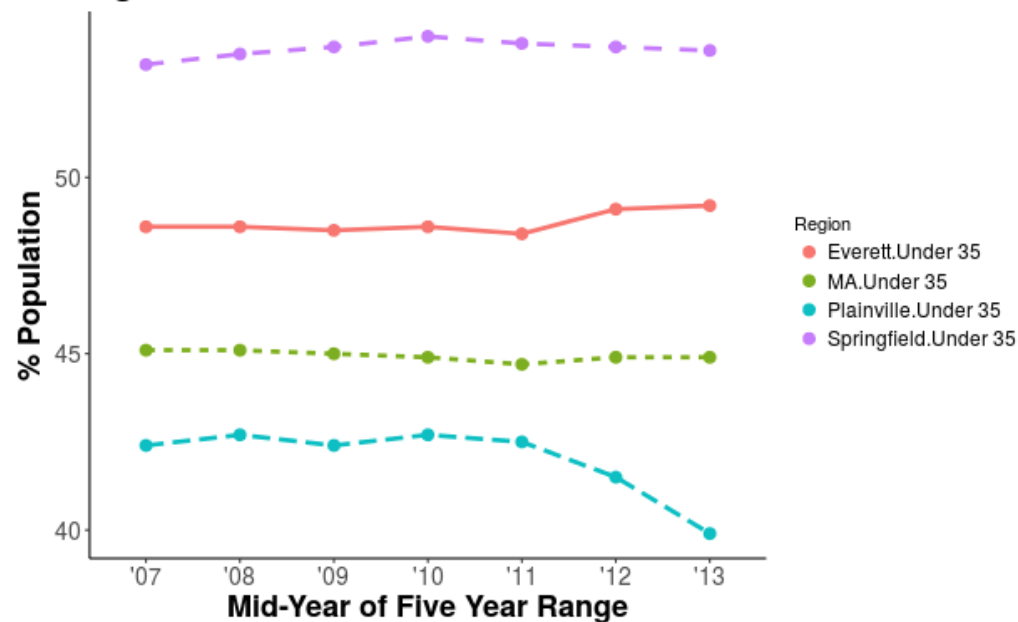
☐ Age 35 to 54

☐ Age Over 75

☐ Age Under 65


☐ Age 55 to 64

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

 Download the plot

Please Select an Age of Interest

- ☐ Age Under 20 ☐ Age 20 to 34 ☐ Age 65 to 74
☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
☐ Age Under 65 ☐ Age 55 to 64

Age Distribution

What is the Age variable?

The number of people within each age group, for a region over a specified five year range. Age groups were specified in the dataset as <5, 5-9, 10-14, 15-19, 20-24, 25-34, 35-44, 45-54, 55-59, 60-64, 65-74, 75-84, and 85+. For this app, the number of categories for age has been collapsed to the following six groups: <20, 20-34, 35-54, 55-64, 65-74, and 75+. This is done in order to simplify the presentation of data. Source: American Community Survey (ACS).

Close



Mid-Year of Five Year Range

```
[1] Region   Year      variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

Download the plot

Please Select an Age of Interest

- ☐ Age Under 20 ☐ Age 20 to 34 ☐ Age 65 to 74
- ☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
- ☐ Age Under 65 ☐ Age 55 to 64

Age Distribution

What is the Age variable?

The number of people within each age group, for a region over a specified five year range. Age groups were specified in the dataset as <5, 5-9, 10-14, 15-19, 20-24, 25-34, 35-44, 45-54, 55-59, 60-64, 65-74, 75-84, and 85+. For this app, the number of categories for age has been collapsed to the following six groups: <20, 20-34, 35-54, 55-64, 65-74, and 75+. This is done in order to simplify the presentation of data. Source: American Community Survey (ACS).

Close



Mid-Year of Five Year Range

```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

Download the plot

Please Select an Age of Interest

- ☐ Age Under 20 ☐ Age 20 to 34 ☐ Age 65 to 74
- ☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
- ☐ Age Under 65 ☐ Age 55 to 64

Age Distribution

What is the Age variable?

The number of people within age groups were specified in the 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65-74, 75-84, and 85+. For the following six groups: <20, 20-24, 25-29, 30-34, 35-44, 45-54, 55-59, 60-64, 65-74, 75-84, and 85+. Source: American Community Survey, 2013.



Data Source



- » American Community Survey
- » CDC Wonder
- » MA Labor and Workforce
- » Bureau of Labor Statistics
- » United States Courts
- » MA State Data Center
- » MA DOR

Close



Mid-Year of Five Year Range

```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

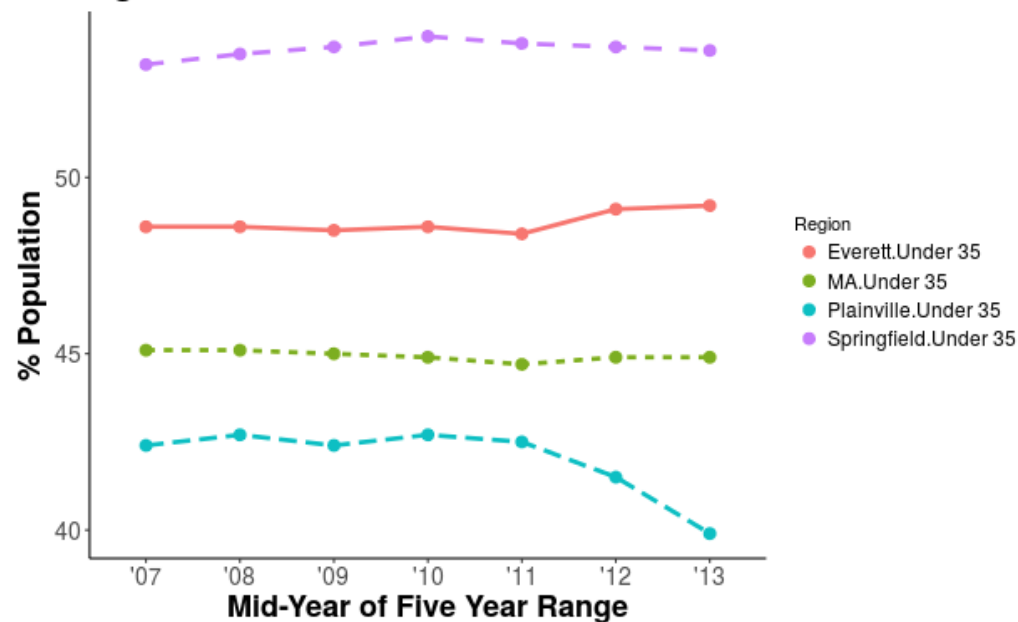
What is the Age variable?

Download the plot

Please Select an Age of Interest


- ☐ Age Under 20 ☐ Age 20 to 34 ☐ Age 65 to 74
- ☒ Age Under 35 ☐ Age 35 to 54 ☐ Age Over 75
- ☐ Age Under 65 ☐ Age 55 to 64

Age Distribution



```
[1] Region Year variable value  
<0 rows> (or 0-length row.names)
```

What is the Age variable?

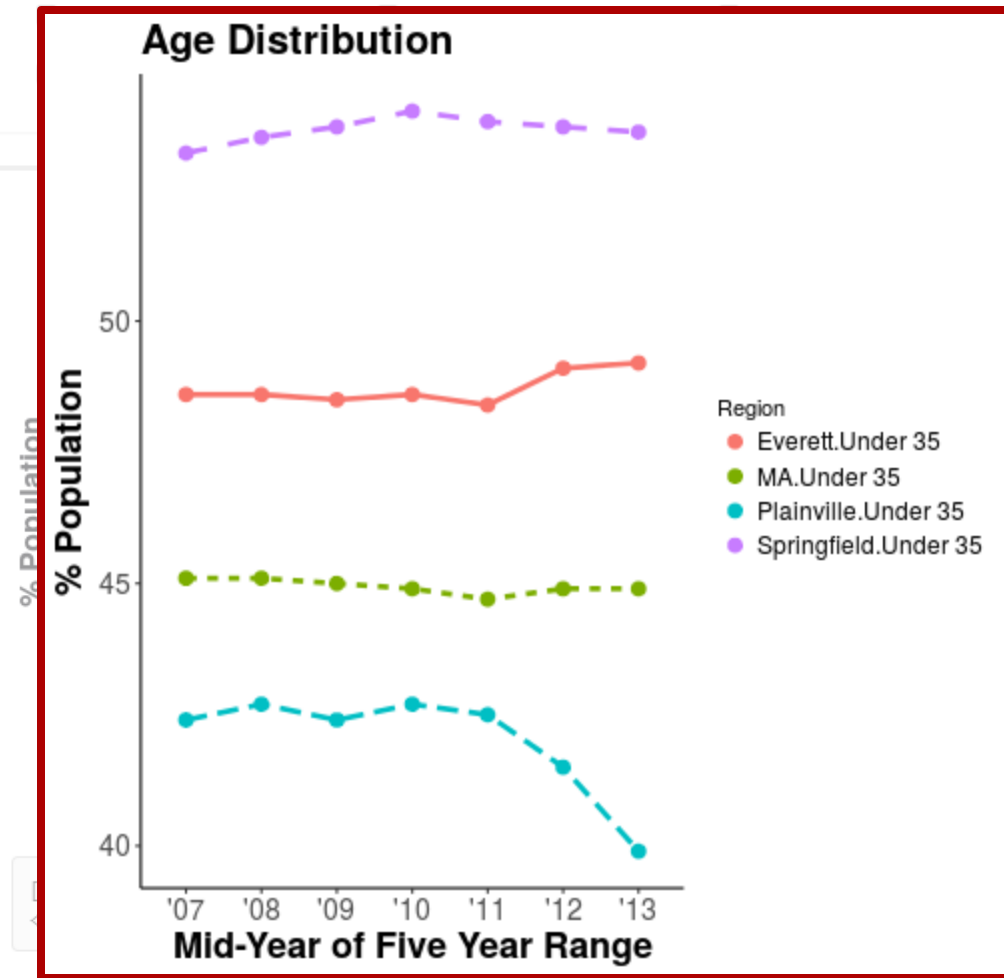
 Download the plot

Please Select an Age of Interest

☐ Age Under 20

☐ Age 20 to 34

☐ Age 65 to 74



What is the Age variable?

[Download the plot](#)

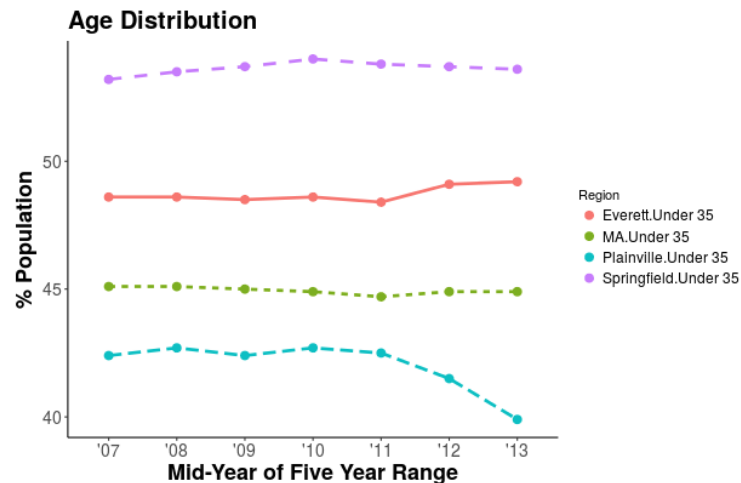
MASS-AT-A-GLANCE



Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

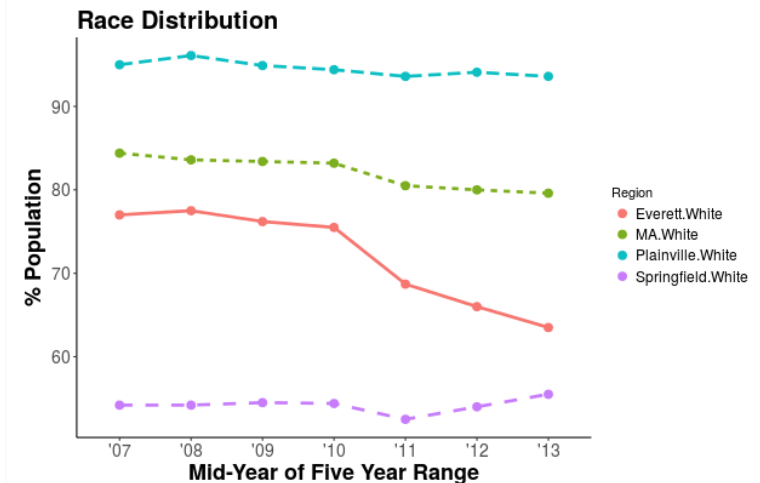
- ☐ Age Under 20
- ☐ Age 20 to 34
- ☐ Age 65 to 74
- ☒ Age Under 35
- ☐ Age 35 to 54
- ☐ Age Over 75
- ☐ Age Under 65
- ☐ Age 55 to 64



[1] Region Year variable value
<0 rows> (or 0-length row names)

Please Select a Race of Interest

- ☒ White
- ☐ Black
- ☐ Hawaiian and Other Pacific Islander (HOPI)
- ☐ Asian
- ☐ American Indian and Alaska Native (AIAN)
- ☐ Others



[1] Region Year variable value
<0 rows> (or 0-length row names)

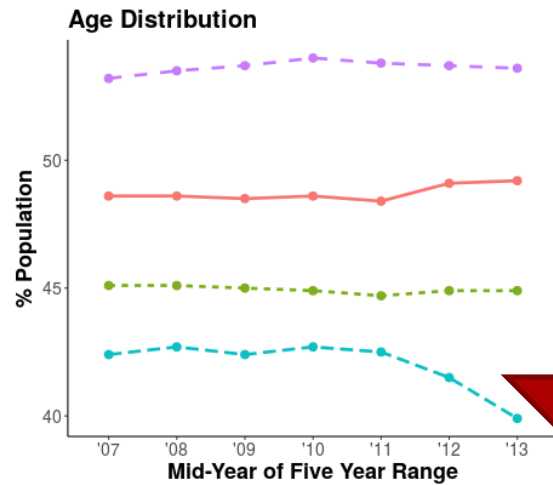
MASS-AT-A-GLANCE



Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

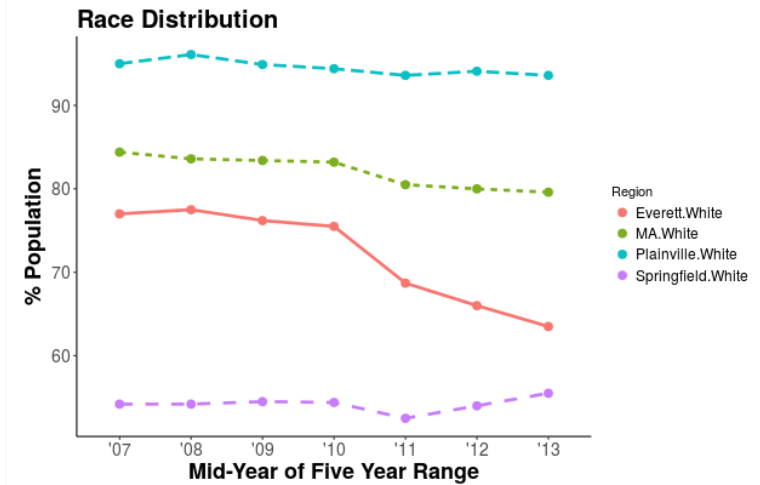
- ☐ Age Under 20
- ☐ Age 20 to 34
- ☐ Age 65 to 74
- ☒ Age Under 35
- ☐ Age 35 to 54
- ☐ Age Over 75
- ☐ Age Under 65
- ☐ Age 55 to 64



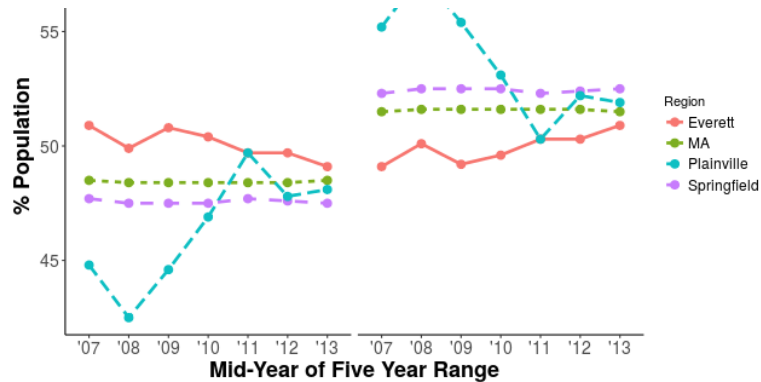
[1] Region Year variable value
<0 rows> (or 0-length row names)

Please Select a Race of Interest

- ☒ White
- ☐ Black
- ☐ Hawaiian and Other Pacific Islander (HOPI)
- ☐ Asian
- ☐ American Indian and Alaska Native (AIAN)
- ☐ Others



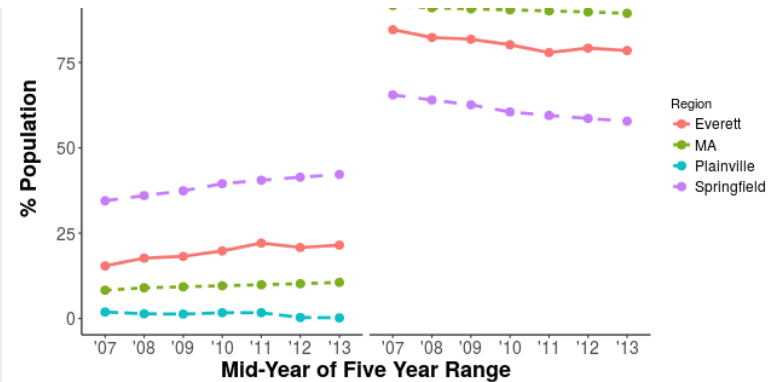
[1] Region Year variable value
<0 rows> (or 0-length row names)



[1] Region Year variable value
<0 rows> (or 0-length row.names)

What is the Gender variable?

[Download the plot](#)



[1] Region Year variable value
<0 rows> (or 0-length row.names)

What is the Ethnicity variable?

[Download the plot](#)

Total Population in Selected Regions (Five Year Range)

Show entries

Region	2005-2009	2006-2010	2007-2011	2008-2012	2009-2013	2010-2014	2011-2015
Plainville	8,167	8,091	8,176	8,278	8,429	8,581	8,735
Springfield	153,170	152,906	152,992	153,278	153,428	153,836	153,947
Everett	37,525	40,560	41,079	41,621	42,092	42,758	43,885
MA	6,511,176	6,477,096	6,512,227	6,560,595	6,605,058	6,657,291	6,705,586

Showing 1 to 4 of 4 entries

[Previous](#) [1](#) [Next](#)

[More information about Demographics.](#)

SEIGMA Demographics App

Created by Xuelian Li, Emily R. Ramos, Arvind Ramakrishnan, and Jenna F. Kirdly

[Send us your comments or feedback!](#)

[Data Source: American Community Survey: table DP05](#)

[View our data and code on GitHub](#)

If using Internet Explorer, application only visible in version 10.



UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

[About](#) [Summary](#) [Plot](#) [Map](#) [More Info](#)

The **SEIGMA Demographics App** displays the demographic composition of Massachusetts' municipalities over a five-year period.

Click on different tabs to see the data in different formats.

- **Summary** shows the data in table format.
- **Plot** compares a municipality's demographic estimate to county, state, and national estimate.
- **Map** visually displays demographic estimates by municipality.
- **More Info** describes demographic estimates including formulas and calculations.

SEIGMA Demographics App

How to use this app:

Please select the five-year range for which you are interested in viewing the estimate of age, gender, race, or ethnicity.

- View the estimate for age, gender, race, or ethnicity by selecting the appropriate box below.
- Select one or multiple municipalities.
- For the five year ranges below, you can compare the demographic estimate in a municipality to national, state, and county estimate.
- **The estimate of age, gender, race, or ethnicity can be sorted in ascending and descending order by clicking the column or variable.**
- Please note that all statistics are five-year estimates.

Select Five Year Range

2005-2009

Categorical variables

- ☒ Age
☐ Gender
☐ Race
☐ Ethnicity

Select Municipality

- ☐ Compare to MA Average
☐ Compare to US Average



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About Summary Plot Map More Info									
Show	25	entries							
Region	Five Year Range	Total Population	Margin Error Total Population	Age under 5 Percentage	Margin Error under 5 Percentage	Age 5-9 Percentage	Margin Error 5-9 Percentage	Age 10-14 Percentage	Margin Error 10-14 Percentage
Abington	2005-2009	16399	36	6.2	1.5	4.5	0.9	8.1	1.6
Acton	2005-2009	20777	38	6.9	1.3	7.7	0.9	10.9	1.2
Acushnet	2005-2009	10372	31	7.1	2.6	6.3	1.9	5.6	1.1
Adams	2005-2009	8363	24	5.0	1.5	5.6	1.5	7.2	1.9
Agawam	2005-2009	28599	32	4.8	0.7	5.9	1.1	6.6	1.0
Alford	2005-2009	400	58	2.3	2.1	0.5	1.0	3.0	2.2
Amesbury	2005-2009	16503	27	6.5	1.3	4.4	0.8	7.4	1.2
Amherst	2005-2009	35971	31	2.1	0.6	2.5	0.5	3.2	0.5
Andover	2005-2009	33309	48	5.8	0.9	7.3	0.9	7.9	0.7

SEIGMA Demographics App

How to use this app:

Please select the municipality and five year range for which you are interested in viewing the estimate of age, gender, race, or ethnicity.

- View the estimate for age, gender, race, or ethnicity by selecting the appropriate box below.
- For a given five-year period, you can compare the municipality of your choice to the national, state, and county estimate for age, gender, race, and ethnicity.

Select Five Year Range

2011-2015

Categorical variables

- ☒ Age
☐ Gender
☐ Race
☐ Ethnicity

Select Municipality

Plainville

Created by Xuelian Li, Emily R. Ramos, Arvind Ramakrishnan, and Jenna F. Kiridly

[Send us your comments or feedback!](#)

[Data Source: American Community Survey: table DP05](#)

[View our data and code on GitHub](#)

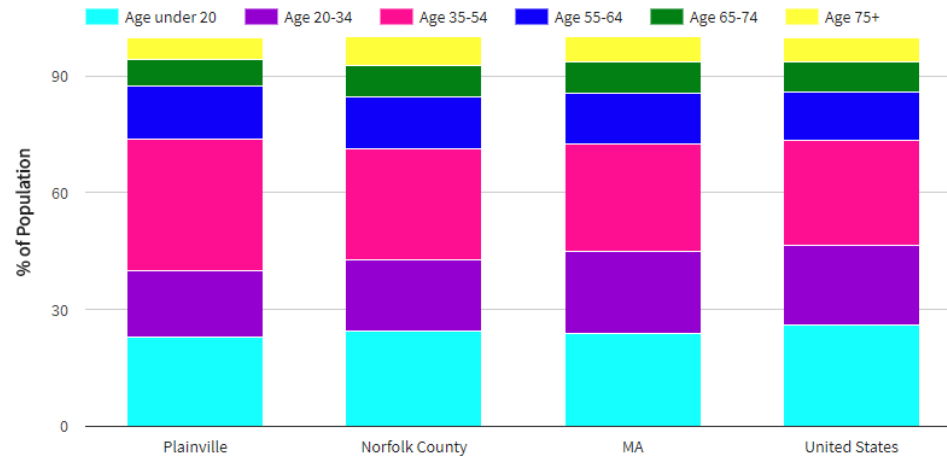
If using Internet Explorer, application only visible in version 10.



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[About](#) [Summary](#) [Plot](#) [Map](#) [More Info](#)

Age as a Percentage of the Population by Region Plainville over selected five years 2011-2015



Age - The number of categories for age has been collapsed to the following six groups; <20, 20-34, 35-54, 55-64, 65-74, 75+. This is done in order to simplify the presentation of data. To see all age groups please go to the summary tab.

SEIGMA Demographics App

How to use this app:

Please select a five- year range and click on Generate Map to get started.

- Select the variable of interest for age, gender, race, or ethnicity by selecting either an age range, gender, race, or ethnicity from the drop down list below.
- Clicking on a municipality will display the variable of interest for the five-year range and gender that you selected.

Select Five Year Range

2011-2015

Categorical variables

- ☒ Age
- ☐ Gender
- ☐ Race
- ☐ Ethnicity

Select Variable of Interest

under 20

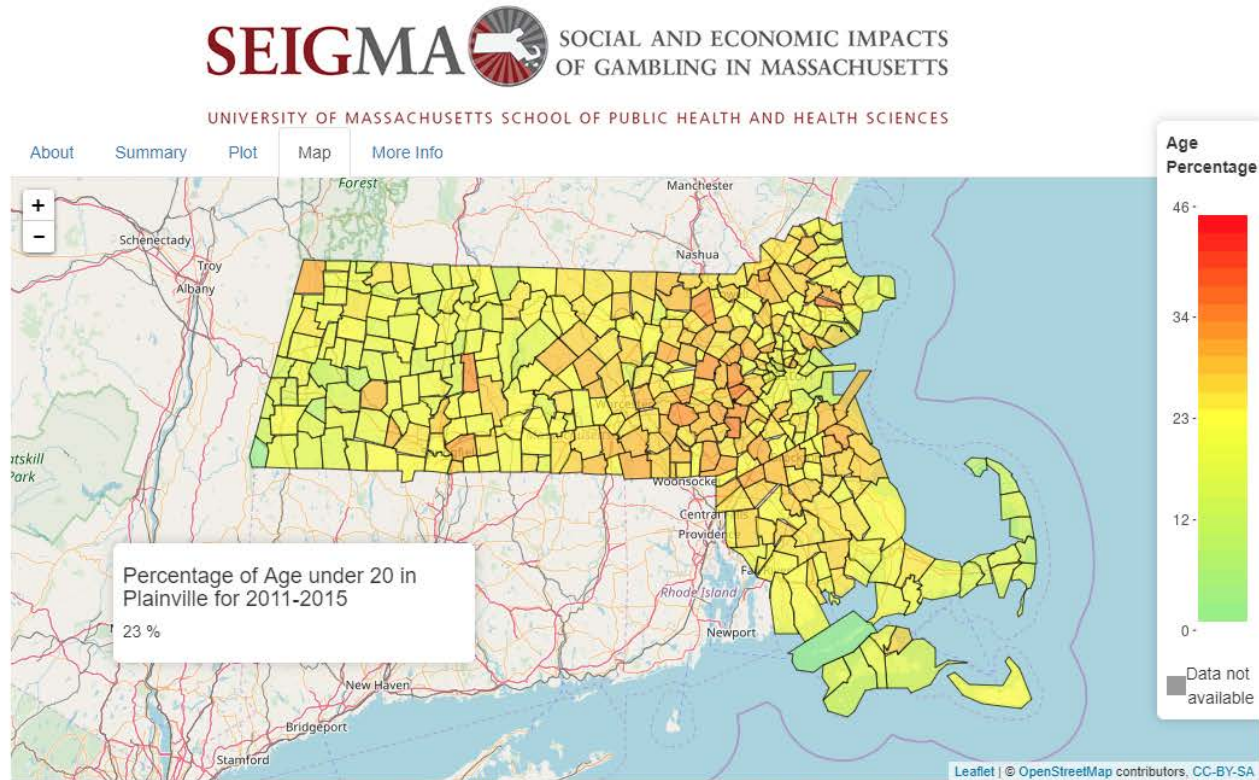
Created by Xuelian Li, Emily R. Ramos, Arvind Ramakrishnan, and Jenna F. Kiridly

[Send us your comments or feedback!](#)

[Data Source: American Community Survey: table DP05](#)

[View our data and code on GitHub](#)

If using Internet Explorer, application only visible in version 10.



Age - The number of categories for age has been collapsed to the following six groups; <20, 20-34, 35-54, 55-64, 65-74, 75+. This is done in order to simplify the presentation of data. To see all age groups please go to the summary tab.

SEIGMA Demographics App

How to use this app:

This tab contains more detailed information regarding the variables of interest.

Created by Xuelian Li, Emily R. Ramos, Arvind Ramakrishnan, and Jenna F. Kirindly

[Send us your comments or feedback!](#)

[Data Source: American Community Survey: table DP05](#)

[View our data and code on GitHub](#)

If using Internet Explorer, application only visible in version 10.



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[About](#) [Summary](#) [Plot](#) [Map](#) [More Info](#)

Variable Summary:

Race - The number of people within each race, for a region over a specified five year range. Races were listed as White, Black or African American, Asian, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, or some other race. Within the Map tab race categories are listed here as White, Black, and Asian. Although the data for other races is available, the percentage is too small to depict in map format accurately. To view the percentage of other race categories please refer to the Plot or Summary tabs.

Ethnicity - The number of people within each ethnicity, for a region over a specified five year range. Ethnicities were listed as hispanic or not hispanic.

Gender - The number of people within each gender, for a region over a specified five year range.

Age - The number of people within each age group, for a region over a specified five year range. Age groups were specified as <5, 5-9, 10-14, 15-19, 20-24, 25-34, 35-44, 45-54, 55-59, 60-64, 65-74, 75-84, and 85+. Within the Plot and Map tab the number of categories for age has been collapsed to the following six groups; <20, 20-34, 35-54, 55-64, 65-74, 75+. This is done in order to simplify the presentation of data. To see all age groups please go to the summary tab.

Five-Year Estimate - Survey information is collected everyday of the year and then aggregated over a specific time period, five years. Multiyear estimates are available to regions with populations less than 65,000. However, more precise estimates are possible with larger geographic regions. To analyze change over time, users are discouraged from utilizing overlapping multi-year estimates (e.g. 2005-2009, 2006-2010) due to the inability to isolate change with precision.

[Please fill out our survey to help improve the site!](#)

Current Demographic Data

- Age
- Race
- Gender
- Ethnicity
- Population

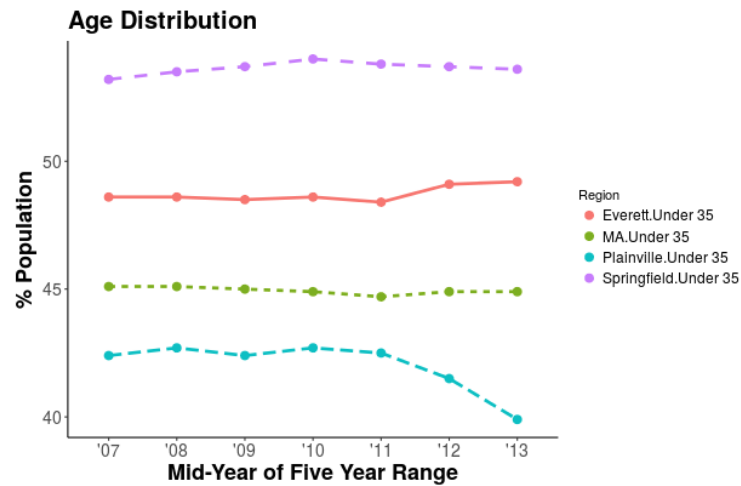
MASS-AT-A-GLANCE



Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

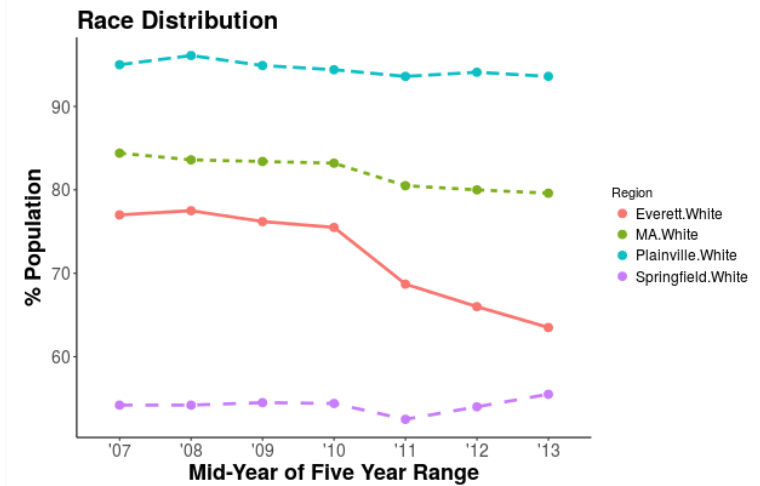
- ☐ Age Under 20
- ☐ Age 20 to 34
- ☐ Age 65 to 74
- ☒ Age Under 35
- ☐ Age 35 to 54
- ☐ Age Over 75
- ☐ Age Under 65
- ☐ Age 55 to 64



```
[1] Region Year variable value  
<0 rows> (or 0-length row names)
```

Please Select a Race of Interest

- ☒ White
- ☐ Black
- ☐ Hawaiian and Other Pacific Islander (HOPI)
- ☐ Asian
- ☐ American Indian and Alaska Native (AIAN)
- ☐ Others



```
[1] Region Year variable value  
<0 rows> (or 0-length row names)
```

Current Social Data

- Marital Status
- Educational Attainment
- Civilian Veterans Status
- Suicide Rate
- English Language Learner
- Students with Disabilities

MASS-AT-A-GLANCE

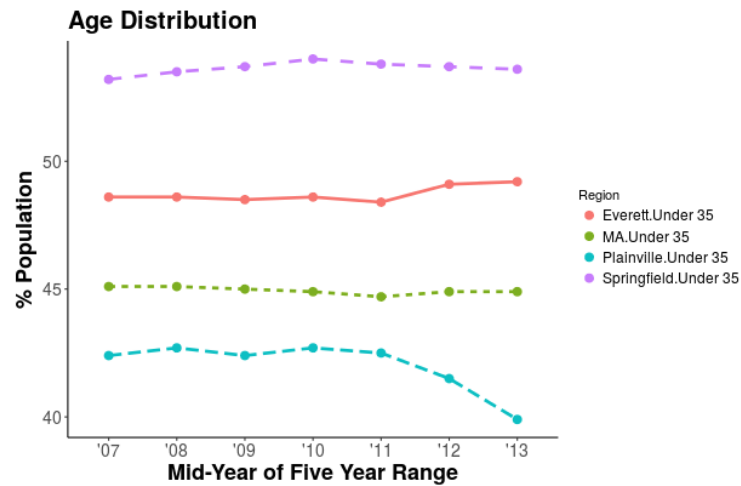


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Population estimates can be found at the bottom of the page.

Please Select an Age of Interest

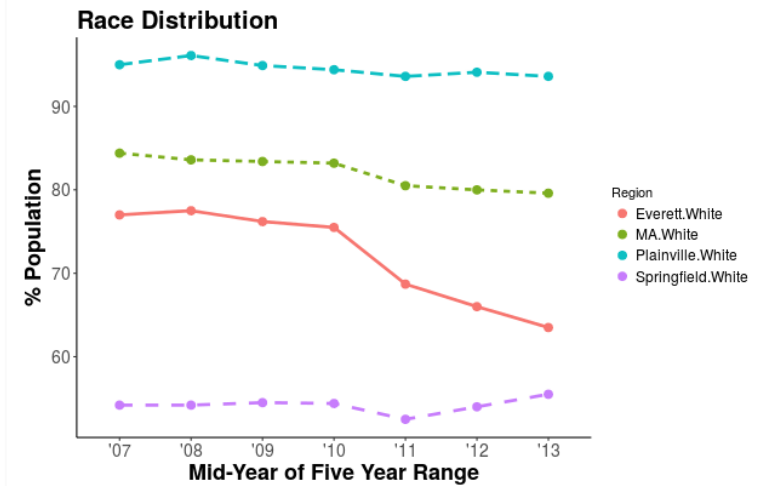
- ☐ Age Under 20
- ☐ Age 20 to 34
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- ☒ Age Under 35
- ☐ Age 35 to 54
- ☐ Age Over 75
- ☐ Age Under 65
- ☐ Age 55 to 64



```
[1] Region Year variable value  
<0 rows> (or 0-length row names)
```

Please Select a Race of Interest

- ☒ White
- ☐ Black
- ☐ Hawaiian and Other Pacific Islander (HOPI)
- ☐ Asian
- ☐ American Indian and Alaska Native (AIAN)
- ☐ Others



```
[1] Region Year variable value  
<0 rows> (or 0-length row names)
```

Current Economic Data

- Household Income
- Poverty Rate
- Employment
- Unemployment
- Bankruptcies
- Rent
- Building Permits
- Property Values
- Tax Levies



Demographics

Economic Variables

Social Variables

Data

MASS-AT-A-GLANCE

Data Spotlight

Rachel Volberg, Principal Investigator of the SEIGMA-MAGIC projects, details findings from a California survey looking at relative risk factors for problem gambling. Find the abstract [here](#). If interested in a full copy, please contact Dr. Volberg

Thank you!

For more information:

www.umass.edu/seigma/data



TO: Chairman Crosby, Commissioner Cameron, Commissioner O'Brien,
Commissioner Stebbins, Commissioner Zuniga

FROM: Paul Connelly, Director of Licensing

DATE: May 8, 2018

RE: Gaming Service Employee (SER) Exemptions: Plainridge Park Casino

SUMMARY

The Commission is being asked to consider 51 positions (list attached) at Plainridge Park Casino for exemption. "Exemption Identification Forms" are included in the packet.

Exempted Positions (Recommended)		
Total # of Positions	Unique Job Profile #s	Total Exempt Headcount
66	51	157

Commission staff worked collaboratively with Plainridge Park Casino in developing this set of recommendations and is in agreement with all positions contained in this packet.

BACKGROUND

On November 2, 2017 Governor Baker signed a statutory amendment which granted the Massachusetts Gaming Commission the authority to exempt certain "Gaming Service Employee" level job positions from the mandatory registration process. At its January 18, 2018 meeting, the Massachusetts Gaming Commission discussed its policy perspective on this exemption authority and provided staff with a framework and process for considering any potential exemptions. Additionally, the Commission endorsed factors for consideration when making exemption determinations. These included whether or not the position involves:

- Work performed on the gaming floor
- Managerial responsibilities in any department
- Supervisory responsibilities in Human Resources, Sales and Marketing
- Responsibilities for alcohol sales, distribution, service, and/or storage



Massachusetts Gaming Commission

- Access to secure casino back-of-the house areas (including executive offices) without security escort
- Responsibilities for accounting and/or finance relating to the gaming establishment
- “Write” access to gaming-related casino databases
- Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information

At the February 22, 2018 Commission meeting, staff presented positions at MGM Springfield that met the Commission’s criteria for potential exemption. At that time, the Commission voted to exempt 67 unique job profiles (127 positions) representing a total employee headcount of 824 individuals.

It was noted at this meeting that any exemption decision may be revisited by the Commission at any time, and additional positions may be exempted in the future.



Massachusetts Gaming Commission



PLAINRIDGE PARK
CASINO

**IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE
REGISTRATION REQUIREMENT BY THE MGC**

Exempted Positions (Recommended)		
Total # of Positions	Unique Job Profile #s	Total Exempt Headcount
66	51	157

JOB CODE	DEPARTMENT	PROPERTY ACCESS LEVEL	MGC LICENSING CATERGORY	JOB
PC05344U	F&B	N	Exempt	BANQUET COOK 1
PC05341N	F&B	N	Exempt	BANQUET DEMI CHEF
PC05347U	F&B	N	Exempt	BANQUET LINE COOK
PC05202N	F&B	N	Exempt	BANQUET MANAGER
PC05339U	F&B	N	Exempt	BANQUET SERVER
PC05224N	F&B	N	Exempt	BANQUET SOUS CHEF
PC05222N	F&B	N	Exempt	CHEF DE CUISINE
PC05338U	F&B	N	Exempt	COOK 1 - B.GOOD
PC05334U	F&B	N	Exempt	COOK 2 - B. GOOD
PC05335U	F&B	N	Exempt	COOK 3 - B. GOOD
PC05306U	EVS	N	Exempt	EDR ATTENDANT
PC05102N	F&B	N	Exempt	EXECUTIVE CHEF
PC05231N	F&B	N	Exempt	EXECUTIVE SOUS CHEF
PC05204N	F&B	N	Exempt	EXECUTIVE STEWARD
PC05308N	F&B	N	Exempt	F&B ADMIN ASSISTANT
PC05213N	F&B	N	Exempt	FLUTIES ASSISTANT MANAGER
PC05328U	F&B	N	Exempt	FLUTIES BUSSER
PC05311U	F&B	N	Exempt	FLUTIES COOK 1
PC05338N	F&B	N	Exempt	FLUTIE'S DEMI CHEF
PC05341U	F&B	N	Exempt	FLUTIE'S FOOD RUNNER
PC05314U	F&B	N	Exempt	FLUTIES HOST/HOSTESS
PC05312U	F&B	N	Exempt	FLUTIES LINE COOK

PC05313U	F&B	N	Exempt	FLUTIES PREP COOK
PC05309U	F&B	N	Exempt	FLUTIES SERVER
PC05208N	F&B	N	Exempt	FLUTIES SOUS CHEF
PC05217N	F&B	N	Exempt	FOOD COURT ASST MANAGER
PC05305U	F&B	N	Exempt	FOOD COURT ATTENDANT
PC05345U	F&B	N	Exempt	FOOD COURT COOK 1
PC05340N	F&B	N	Exempt	FOOD COURT DEMI CHEF
PC05329U	F&B	N	Exempt	FOOD COURT PIZZA LINE COOK
PC05216N	F&B	N	Exempt	FOOD COURT SOUS CHEF
PC21302U	FACILITIES	N	Exempt	GROUNDKEEPER
PC05343U	F&B	N	Exempt	HOUSEMAN/BANQUET ATTENDANT
PC05326U	F&B	N	Exempt	OYSTER BAR BUSSER
PC05321U	F&B	N	Exempt	OYSTER BAR COOK 1
PC05340U	F&B	N	Exempt	OYSTER BAR FOOD RUNNER
PC05322U	F&B	N	Exempt	OYSTER BAR HOST/HOSTESS
PC05319U	F&B	N	Exempt	OYSTER BAR LINE COOK
PC05320U	F&B	N	Exempt	OYSTER BAR PREP COOK
PC05310U	F&B	N	Exempt	OYSTER BAR SERVER
PC05211N	F&B	N	Exempt	OYSTER BAR SOUS CHEF
PC09301U	RETAIL	N	Exempt	RETAIL CLERK
PC05339N	F&B	N	Exempt	SLACKS DEMI CHEF
PC05346U	F&B	N	Exempt	SLICE PREP COOK
PC05307U	F&B	N	Exempt	STEWARD
PC05324U	F&B	N	Exempt	STEWARD DEEP CLEANER
PC05342N	F&B	N	Exempt	STEWARD SUPERVISOR
PC23301U	VALET	N	Exempt	VALET ATTENDANT
PC23302U	VALET	N	Exempt	VALET CAPTAIN
PC38301N	WARDROBE/HR	N	Exempt	WARDROBE SEAMSTRESS
PC18301U	FINANCE	N	Exempt	WAREHOUSE/REC ATTNDNT



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 amendments to 205 CMR 146.00: Gaming Equipment.

These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. The amendments are a change in format to allow for a simpler updating process of rules of the games as needed.

This regulation governs the authorization of the rules of the game for table games offered for play in a gaming establishment and the standards applicable to table games offered for play in a gaming establishment. It is largely governed by G.L. c.23K, §§2, 4(37), and 5, and applies directly to gaming licensees, patrons, and petitioners.

To the extent that a petitioner is a small business, this regulation may impact small businesses. In this regard, the proposed amendments throughout are administrative, and will not change the action of the regulation. In accordance with G.L. c.30A, §2, the Commission offers the following responses to the statutory questions:

1. Estimate of the number of small businesses subject to the proposed regulation:

To the extent that a petitioner is a small business, they may be impacted by this regulation. It is difficult to estimate with accuracy the potential number of petitioners that may be a small business submitting petitions for a new game or game variation.

2. State the projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation:

There are no further projected reporting, recordkeeping or administrative costs created by this regulation that would affect small businesses.

3. State the appropriateness of performance standards versus design standards:

Although table game rules must be prescriptive in nature to provide uniform process to all, this regulation does not implicate further design or performance standards.

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:



Massachusetts Gaming Commission

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.

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the commonwealth:

G.L. c.23K was enacted to create a new industry in the Commonwealth and to promote and grow local small businesses and the tourism industry, including the development of new small businesses. The proposed regulation is designed to effectuate those intentions and growth.

Massachusetts Gaming Commission

By:

Shara Bedard

Paralegal

Legal Division

Dated: _____



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 146.00: GAMING EQUIPMENT

- 146.01: Gaming Chips (General Rules)
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146.01: Gaming Chips and Plaques (General Rules)

- (1) No gaming chip shall be utilized by a gaming licensee in a gaming establishment until:
 - (a) The design specifications of the proposed gaming chip, prior to the manufacture of the gaming chip, are submitted to and approved by the Bureau, which submission shall include a detailed schematic depicting the actual size and, as appropriate, location of the following:
 1. Each “face” of the gaming chip, which is the flat surface across which the diameter of the chip can be measured including any indentations or impressions;
 2. The “edge” of the gaming chip, which is the surface of the chip across which its thickness can be measured in a perpendicular line from one face to the other; and
 3. Any colors, words, designs, graphics or security measures contained on or within the gaming chip;
 - (b) A sample stack of 20 gaming chips, manufactured in accordance with its approved design specifications, is submitted to and approved by the Bureau; and
 - (c) The Bureau has confirmed that the identification requirements of 205 CMR 146.01 are visible using the gaming licensee’s closed circuit television system.
- (2) Each gaming chip issued by a gaming licensee shall be designed and manufactured with sufficient graphics or other security measures including, at a minimum, those features specifically required to appear on the face or edge of a gaming chip pursuant to 205 CMR 146.01 so as to prevent, to the greatest extent possible, the counterfeiting of the gaming chip.
- (3) No gaming licensee shall use or redeem in its gaming establishment any gaming chip that it knows, or reasonably should know, is materially different from the approved sample or no longer conforms to the requirements of 205 CMR 146.01.
- (4) No gaming licensee or other person licensed by the Commission shall manufacture for, sell to, distribute to, or use in any facility outside of Massachusetts any gaming chips having the same edge spot and design specifications as those approved for use in Massachusetts gaming establishments.
- (5) A gaming licensee may issue promotional non-gaming chips that are prohibited from use for gaming in any gaming establishment. The physical characteristics of such chips shall be sufficiently distinguishable from approved design specifications of any gaming chip issued by any gaming licensee so as to reasonably ensure that they will not be confused with authorized gaming chips. At a minimum, such promotional non-gaming chips shall:
 - (a) Be unique in terms of size or color;
 - (b) Have no edge designs unique to gaming chips; and

(c) Bear the name of the gaming licensee issuing them and language on both faces stating that they have no redeemable value.

(6) A gaming licensee shall remove a set of gaming chips in use from active play whenever it has reason to believe the gaming establishment has accepted counterfeit chips or whenever any other impropriety or defect in the utilization of that set of chips makes removal of the chips in active use necessary or whenever the Bureau so directs. An approved back-up set of value chips or non-value chips shall be placed into active play whenever an active set is removed.

(7) Whenever chips in active use are removed from play, the gaming licensee shall immediately notify the Bureau of the removal and the reason for removal.

(8) Each set of gaming chips approved by the Bureau for use by a gaming licensee shall receive a unique and permanent alphabetical designation. This designation shall be assigned by the gaming licensee during the design schematic approval process and shall be used for all inventory procedures required by 205 CMR 146.02. If a gaming licensee elects to commingle gaming chips pursuant to 205 CMR 146.02, in addition to the assigned alphabetical designation for that set of chips, each different sample within the set shall also be assigned an accompanying unique numeric designation.

(9) If a licensee uses RFID chips or plaques they must submit a detailed description of the technology and devices proposed for use at the gaming establishment. Any certifications or testing done by an independent testing lab that is certified by the Commission pursuant to 205 CMR 144.06 must be included in the submission. Policies and procedures describing how the RFID chips and related equipment will be used must be submitted to the Commission.

146.02: Receipt of gaming chips or plaques from manufacturer or distributor; inventory, security, storage and destruction of chips and plaques

(1) When gaming chips or plaques are received from the manufacturer or distributor, they shall be opened and inspected by at least three employees, one of whom shall be from the accounting or auditing department of the gaming licensee, one of whom shall be from the games department, and one from any mandatory department other than the surveillance department of the gaming licensee.

(2) Each gaming licensee shall report to the Bureau promptly after an inspection performed pursuant to 205 CMR 146.02(1) if the inspection discloses any discrepancy between the invoice accompanying the chips and plaques and the actual chips or plaques received or any defects found in such chips or plaques.

(3) After inspecting the gaming chips or plaques received, the gaming licensee shall cause to be recorded in a chip inventory ledger (manual or electronic) the assigned alphabetical designation, the denomination of the value chips and gaming plaques received, the number of each denomination of value chip and gaming plaque received, the number and description of all non-value chips received, the date of such receipt, and the signatures of the employees who inspected such chips and plaques. If the chips or plaques are required to have a unique serial number, the numeric number shall also be recorded. If the gaming chips or plaques are not put into active use, the ledger shall also identify the storage location.

(4) Any gaming chips or plaques not in active use shall be stored in:

- (a) An approved vault;
- (b) The cashiers' cage; or
- (c) A comparable secure area, approved by the Bureau, which is adjacent to and accessible exclusively from the gaming floor.

(5) Whenever any gaming chips or plaques are removed from or returned to an approved storage area, at least two employees shall be present, one of whom shall be a supervisor from the games or security department, and the following information shall be recorded in the chip inventory ledger together with the date and signatures of the employees involved:

- (a) The alphabetical designation and, if applicable, any numeric designation;
- (b) The number and dollar amount for each denomination of value chip or gaming plaque removed or returned;
- (c) The number and description of the non-value chips removed or returned;
- (d) The specific storage area being entered; and
- (e) The reason for the entry into the storage area.

(6) At the end of each gaming day, a gaming licensee shall compute and record the unredeemed liability for each denomination of value chips and gaming plaques. At least once every 30 days, at a minimum, each gaming licensee shall inventory all sets of value chips and gaming plaques in its possession and shall record the result of such inventory in the chip inventory ledger. The procedures to be utilized to compute the unredeemed liability and to inventory value chips and gaming plaques shall be submitted to the Bureau. A physical inventory of value chips and gaming plaques not in active use shall only be required annually if the inventory procedures incorporate the sealing of the locked compartment. If a gaming licensee elects to commingle gaming chips, a member of the gaming establishment's accounting department shall, at least once every six months, inventory all gaming chips of a particular sample and readjust the starting inventory for those gaming chips which are no longer in the possession of the gaming licensee. The adjusted inventory figure shall be recorded in the chip inventory ledger and shall be the new beginning inventory figure for the next six-month period for purposes of computing the daily outstanding chip liability required by this section.

(7) The Bureau shall approve the process for the destruction of chips and plaques. Prior to the destruction of gaming chips and plaques, the gaming licensee shall notify the Bureau, in writing, of the date and the location at which the destruction will be performed, the denomination, number and amount of value chips and plaques to be destroyed, and the description and number of non-value chips to be destroyed. Unless otherwise authorized by the Bureau, the destruction of gaming chips and plaques shall be carried out in the presence of at least two employees of the gaming licensee, one of whom shall be from the accounting department and one of whom shall be from any other mandatory department other than the surveillance department. The denomination, number and amount of value chips and plaques or, in the case of non-value chips, the description and number so destroyed shall be recorded in the chip inventory ledger together with the signatures of the individuals carrying out such destruction, and the date on which the destruction occurred. The gaming licensee shall also maintain a written log of the names and credential numbers of all individuals involved in each such destruction.

(8) A gaming licensee shall ensure that at all times there is adequate security, as approved by the Bureau, for all gaming chips and plaques in its possession.

146.03: Value Gaming Chips

(1) Each gaming chip which contains a denomination on its face shall be known as a "value chip." Value chips shall only be utilized on the gaming floor, unless otherwise authorized by the Bureau.

(a) Each gaming licensee shall be authorized to issue and use value chips in denominations of \$1.00, \$2.50, \$5.00, \$10.00, \$20.00, \$25.00, \$100.00, \$500.00, \$1,000, \$5,000, \$20,000, and \$25,000 and in such quantities as the gaming licensee may deem appropriate to conduct gaming in its gaming establishment.

(b) Each value chip issued by a gaming licensee shall be in the form of a disk. Value chips with a denomination of \$1.00, \$2.50, \$5.00, \$10.00, \$20.00, \$25.00, and \$100.00, shall have a uniform diameter of one and 9/16ths inches. Any value chip issued by a gaming licensee in the denomination of \$500.00 shall have a uniform diameter of one and 9/16ths inches or one and 11/16ths inches. Any value chip issued in the denomination of \$1,000, \$5,000, \$20,000, or \$25,000 shall have a uniform diameter of one and 11/16ths inches.

(c) Each value chip issued in a denomination of \$20,000 or \$25,000, in addition to satisfying the requirements set forth in this section, shall be impressed with a unique serial number.

(d) A gaming licensee may file a petition for Commission approval requesting a different denomination value chip than listed in 205 CMR 146.03(1)(a)-(c).

(2) Each denomination of value chip issued by a gaming licensee shall contain a predominant color unique to that denomination to be known as the "primary color." A "secondary color" on a value chip is any color, other than that chip's primary color, that the Bureau authorizes a gaming licensee to include on the face or edge of the chip as a

contrast to the chip's primary color, except that no primary color shall be used as a secondary color on a value chip of another denomination where such use on the edge is reasonably likely to cause confusion as to the chip's denomination when the edge alone is visible.

(3) Each licensed gaming chip manufacturer shall submit sample color disks to the Bureau that identify all primary and secondary colors to be used for the manufacturing of gaming chips for gaming licensees in Massachusetts. Once a gaming chip manufacturer has received approval from the Bureau for a primary or secondary color, those colors shall be consistently manufactured in accordance with the approved samples. In order for a primary color to be approved for use, it must visually appear, when viewed either in daylight or under incandescent light, to comply with the following colors.

- (a) \$1.00 - "White;"
- (b) \$2.50 - "Pink;"
- (c) \$5.00 - "Red;"
- (d) \$10.00 - "Blue;"
- (e) \$20.00 - "Yellow;"
- (f) \$25.00 - "Green;"
- (g) \$100.00 - "Black;"
- (h) \$500.00 - "Purple;"
- (i) \$1,000 - "Fire Orange;"
- (j) \$5,000 - "Gray;"
- (k) \$20,000 - "Mustard Yellow;" and
- (l) \$25,000 - "Gold."

(4) Each value chip issued by a gaming licensee shall contain certain identifying characteristics that may appear in any location at least once on each face of the gaming chip and are applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming chip. These characteristics shall, at a minimum, include:

- (a) The denomination of the value chip, expressed in numbers;
- (b) The name, trade name, or other approved identification of the gaming licensee issuing the value chip, which shall be applied in such a manner so as to be visible to surveillance employees using the closed circuit television system;
- (c) For each value chip with a denomination below \$25.00 at least one anti-counterfeiting measure and for each value chip with a denomination of \$25.00 or more at least two anti-counterfeiting measures in addition to those items specifically required to appear on the face or edge of a value chip by 205 CMR 146.01 and 146.03(1);
- (d) The word "Massachusetts" if the gaming licensee has gaming properties in other gaming jurisdictions; and
- (e) The primary color of the value chip.

(5) In addition to the characteristics specified in 205 CMR 146.02(4), each value chip in a denomination of \$25.00 or more shall contain a third anti-counterfeiting measure and a design or other identifying characteristic that is unique to the gaming chip manufacturer that makes the chip. Upon approval of a particular design or characteristic by the Bureau, the gaming chip manufacturer shall thereafter be precluded from using that same design or characteristic on any other denomination of value chip that it manufactures. The approved unique design or characteristic may only be changed upon a showing by the gaming chip manufacturer that, despite the change, each value chip in a denomination of \$25.00 or more shall nonetheless be readily identifiable to the manufacturer.

(6) Each value chip issued by a gaming licensee shall contain an identifying characteristic, to be known as an "edge spot," which shall:

(a) Be applied in a manner which ensures that the edge spot shall:

1. Be clearly visible on the edge and, to the extent required by the Bureau, on each face of the value chip; and
2. Remain a permanent part of the value chip.

(b) Be created by using:

1. The primary color of the chip; and
2. One or more secondary colors.

(c) Include a design, pattern or other feature that a person with adequate training could readily use to identify, when viewed through the closed circuit television system of the gaming licensee, the denomination of the particular value chip when placed in a stack of gaming chips, in the table inventory or in any other location where only the edge of the value chip is visible; provided, however, that the design, pattern or feature created by the primary and secondary colors required by 205 CMR 146.03 shall be sufficient by themselves to satisfy the requirements of this paragraph if approved for that purpose by the Bureau.

(7) When determining the secondary colors to be used to make the edge spot on a particular denomination of value chip, a gaming licensee shall, unless otherwise approved by the Bureau, use only those secondary colors that are reasonably likely to differentiate its value chip from the same denomination of value chip issued by any other gaming licensee.

(8) In addition to any other requirement of 205 CMR 146.03, the edge spots on a value chip that has non-identical faces and a denomination of \$25.00 or more shall appear uniform in design, pattern, or other feature when viewed from the perspective of the same face on any other value chip in the set. The edge spots on a value chip that has non-identical faces and a denomination below \$25.00 may appear uniform in design, pattern or other feature or as an inverted mirror image thereof when viewed from the perspective of either face on any other value chip in the set.

(9) Unless otherwise authorized by the Bureau, for each value gaming chip that a gaming licensee elects to issue pursuant to this section whose denomination is greater than

\$10.00, or equal to \$1,000 or \$5,000, it shall also have at least one approved set of gaming chips that may be used as a back-up for the gaming chips in active use. Each set of value chips maintained for use by a gaming licensee shall have different secondary colors. All sets of value gaming chips shall conform to the color and design requirements set forth in 205 CMR 146.03.

(10) A gaming licensee may obtain Bureau approval of two or more different samples within a single set of value chips for a particular denomination with a value of \$100.00 or less ("commingling"), provided that each sample of a particular denomination shall have the same secondary color and edge design. Any approved sample of a particular denomination of value chip within a single set of chips may be placed in or removed from active use by the gaming licensee at any time.

146.04: Non-value Gaming Chips

(1) Each gaming chip which does not contain a denomination on either face thereof shall be known as a "non-value" chip.

(2) Each non-value chip utilized in a gaming establishment shall be issued solely for the purpose of gaming at roulette.

(3) Each non-value chip issued by a gaming licensee shall contain certain identifying characteristics that may appear in any location at least once on each face of the gaming chip and shall be applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming chip. The characteristics required by 205 CMR 146.04 shall be applied in such a manner so as to be visible to surveillance employees using the closed circuit television system. The identifying characteristics of a non-value chip, at a minimum, shall include:

- (a) The name, trade name, or other identification of the gaming licensee issuing the non-value chip;
- (b) A design, insert, or symbol that will permit a set of non-value chips being used at a particular gaming table to be distinguished from the non-value chips being used at every other gaming table in the gaming establishment;
- (c) The word "Roulette;" and
- (d) Such color and/or design combinations as the Bureau may approve so as to readily distinguish the non-value chips of each player at a particular gaming table from the non-value chips of every other player at the same gaming table and the value chips issued by any gaming licensee.

(4) Each non-value chip issued by a gaming licensee shall contain an identifying characteristic, to be known as an "edge spot," which shall:

- (a) Be applied in a manner which ensures that the edge spot shall:
 - 1. Be clearly visible on the edge and, to the extent required by the Bureau on each face of the non-value chip; and

2. Remain a permanent part of the non-value chip;
 - (b) Be created by using the colors approved for the face of the particular non-value chip pursuant to 205 CMR 146.04 in combination with one or more other colors that provide a contrast with the color on the face of the chip and that enable it to be distinguished from the non-value chips issued by any other gaming licensee; and
 - (c) Include a design, pattern or other feature approved by the Bureau that a person with adequate training could readily use to identify, when viewing the non-value chip through the closed circuit television system of the gaming licensee, the player to whom the non-value chip has been assigned when the non-value chip is placed in a stack of gaming chips or in any other location where only the edge of the non-value chip is visible; provided, however, that the design, pattern or feature created by the colors required by 205 CMR 146.04 shall be sufficient by itself to satisfy the requirements of this paragraph if approved for that purpose by the Bureau.
- (5) Each gaming licensee shall have a reserve non-value chip for each color utilized in the gaming establishment with a design insert or symbol different from those non-value chips comprising the primary set.

146.05: Non-value Chips; Permitted Uses; Inventory and Impressment

- (1) Each non-value chip shall be assigned to a particular gaming table and shall be issued and used for gaming at that table only. All non-value chips utilized at a particular gaming table shall have the same design, insert or symbol as required by 205 CMR 146.04. No gaming licensee or any employee thereof shall allow any patron to remove a non-value chip from the gaming table at which it was issued. If a patron removes a non-value chip from the gaming table at which it was issued, the gaming licensee may redeem such chip at the lowest denomination in use at the table.
- (2) No patron at a gaming table shall be issued or permitted to game with non-value chips that are identical in color and design to any non-value chip issued to any other patron at the same table. When a patron purchases non-value chips, a non-value chip of the same color and design shall be placed in a slot or receptacle attached to the outer rim of the roulette wheel or in such other device as approved by the Bureau. At that time, a marker button denoting the value of a stack of 20 non-value chips of the same color and design shall be placed in the slot, receptacle or other device.
- (3) An impressment of the non-value chips assigned to each gaming table shall be completed at least once every 30 days. The gaming licensee shall record the results of the impressment in the chip inventory ledger required pursuant to 205 CMR 146.02 and shall perform the impressment as follows:
 - (a) A gaming department supervisor shall complete a "Non-Value Chip Impressment" ledger (electronic or manual) to record missing or excess chips and

- shall deliver the ledger and any excess chips to the main bank or chip bank;
- (b) Upon receipt of the "Non-Value Chip Impressment" ledger, a main bank cashier or chip bank cashier shall, if appropriate, immediately prepare any chips needed to impress the table; and
- (c) The gaming department supervisor shall then, if applicable, deliver the non-value chips needed to restore the impress to the appropriate gaming table.

(4) The completed "Non-Value Chip Impressment" form shall be maintained by the accounting department and shall contain, at a minimum, the following:

- (a) The date and time of preparation;
- (b) The design schematic of the chip including its primary color and the applicable table number;
- (c) The signature of the gaming department supervisor who completes the "Non-Value Chip Impressment" form and the impressment for such table; and
- (d) The signature of the main bank cashier or chip bank cashier who reviewed the form and, if necessary, prepared the chips to restore the impressment.

(5) Each gaming licensee shall record in the chip inventory ledger required by 205 CMR 146.02, a monthly summary of the non-value chip inventory for each gaming table. This monthly summary shall include, at a minimum, the following information for each non-value chip color and design:

- (a) The balance on hand at the beginning of the month;
- (b) The number of non-value chips distributed to the gaming table during the month;
- (c) The number of non-value chips returned to inventory during the month; and
- (d) The balance on hand at the end of the month.

146.06: Tournament Chips

(1) If a licensee conducts table game tournaments, the tournaments shall be conducted using tournament chips.

(2) The identifying characteristics of a tournament chip must include, at a minimum:

- (a) The name, logo or other approved identification of the licensee issuing the tournament chip;
- (b) The word "Tournament";
- (c) The denomination of the chip;
- (d) The phrase "No Cash Value"; and
- (e) Color or design combinations so as to readily distinguish the tournament chips from:
 - (i) The Roulette Non-Value chips used for the play of Roulette at the licensed facility.
 - (ii) The value chips issued by any gaming licensee.
 - (iii) Poker room rake chips.

- (3) Tournament chips shall be stored in a secure area approved by the Bureau.
- (4) An inventory of all tournament chips shall be conducted by the licensee prior to the start and after the completion of each tournament.
- (5) Discrepancies in the inventory shall be immediately reported to the casino compliance representatives. The discrepancy report must include the balance for each denomination of tournament chip on hand at the beginning of the tournament and the balance on hand at the end of each tournament.
- (6) Tournament chips shall be assigned only to those tables utilized in a tournament. No casino licensee or any employee thereof shall allow any patron to remove a tournament chip from a tournament.
- (7) Whenever tournament chips are taken from or returned to an approved storage area, at least two employees shall be present, one of whom shall be a supervisor from the casino games or security department or other department approved by the Bureau, and the following information shall be recorded in the tournament chip inventory ledger together with the date and signatures of the employees involved:
 1. The alphabetical designation and, if applicable, any numeric designation;
 2. The number and dollar amount for each denomination of tournament chip removed or returned;
 3. The number and description of the tournament chips removed or returned;
 4. The specific storage area being entered; and
 5. The reason for the entry into the storage area.

146.07: Poker rake chips

- (1) To facilitate the collection of the rake, a licensee may use Poker rake chips in the Poker room.
- (2) Poker rake chips shall only be used by dealers and may only be substituted for value chips that have been collected as part of the rake prior to the rake being placed in the drop box.
- (3) Unused Poker rake chips shall be kept by the dealer in the table inventory container.
- (4) The denominations that may be used for Poker rake chips are \$2, \$3 or \$4.
- (5) The identifying characteristics of a Poker rake chip must include, at a minimum:
 - (a) The name, logo or other approved identification of the licensee;
 - (b) The words "Poker Rake Chip";
 - (c) One of the following denominations: "\$2," "\$3" or "\$4"; and

- (d) Color or design combinations to readily distinguish the Poker rake chips from:
 - (i) The Roulette Non-Value chips used for the play of Roulette at the licensed facility.
 - (ii) The tournament chips used for tournament play at the licensed facility.
 - (iii) The value chips issued by any gaming licensee.

146.08: Gaming Plaques; Issuance and Use; Denominations; Physical Characteristics

- (1) Each gaming plaque issued by a gaming licensee shall be a solid, one-piece object constructed entirely of plastic or other substance approved by the Bureau and shall have no more than six, and at least two, smooth, plane surfaces. At least two of the plane surfaces, each to be known as a "face," shall be opposite and parallel to each other and identical in shape, which shall be a square, rectangle or ellipse. All other surfaces of a gaming plaque shall be known collectively as the "edge."
- (2) No gaming plaque shall be issued by a gaming licensee or utilized in a gaming establishment unless and until:
 - (a) The design specifications of the proposed gaming plaque are, prior to the manufacture of the gaming plaque, submitted to and approved by the Bureau, which submission shall include a detailed schematic depicting the actual size and, as appropriate, location of the following:
 - 1. Each face;
 - 2. The edge; and
 - 3. Any colors, words, designs, graphics or security measures contained on the gaming plaque;
 - (b) A sample gaming plaque, manufactured in accordance with its approved design specifications, is submitted to and approved by the Bureau; and
 - (c) The gaming licensee has submitted to the Bureau internal control procedures which document the distribution, redemption, receipt and inventory of gaming plaques, by serial number, as required by 205 CMR 146.02.
- (3) Each face of a square gaming plaque shall measure no smaller than nine square inches. Each face of a rectangular or elliptical gaming plaque shall measure no smaller than three inches in length by two inches in width. In the case of an elliptical gaming plaque, the length and width of the plaque shall be measured at its axes.
- (4) Each gaming plaque issued by a gaming licensee shall be designed and manufactured with sufficient graphics or other security measures so as to prevent, to the greatest extent possible, the counterfeiting of such gaming plaque.
- (5) Each gaming licensee shall be authorized to issue and use gaming plaques in denominations of \$5,000, \$10,000, \$25,000, \$50,000 and \$100,000, and in such quantities as the gaming licensee may deem proper to conduct gaming in its gaming establishment. Each gaming plaque of a specific denomination utilized by a gaming

licensee shall be in a shape and of a size, as approved by the Bureau, which is identical to the shape and size of all other gaming plaques of that denomination issued by that gaming licensee. The size and shape of each denomination of gaming plaque issued by a gaming licensee shall be readily distinguishable from the size and shape of every other denomination of gaming plaque issued by that gaming licensee.

(6) Each gaming plaque issued by a gaming licensee shall contain certain identifying characteristics which shall appear at least once on each face of the gaming plaque and shall be applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming plaque. These characteristics shall, at a minimum, include:

- (a) The denomination of the gaming plaque, expressed in numbers of no less than three-eighths inch in height;
- (b) The name, trade name, or other approved identification of the gaming licensee issuing the gaming plaque, which shall be applied in such a manner so as to be visible to surveillance employees using the closed circuit television system; and
- (c) A unique serial number.

146.09: Exchange and Redemption of Gaming Chips, Plaques and Coupons

(1) All wagering on authorized games, other than slot machines, in a gaming establishment shall be conducted with gaming chips or plaques; provided, however, that coupons shall be permitted for use in wagering at authorized games in accordance with 205 CMR 146.09. A gaming licensee shall submit to the Bureau a sample of its coupons. Value chips previously issued by a gaming licensee which are not in active use by that gaming licensee shall not be used for wagering at authorized table games and shall not be accepted or exchanged for any purpose. Such chips shall only be redeemed at the cashiers' cage pursuant to 205 CMR 146.09(7).

(2) Gaming chips or plaques shall be issued to a patron only at the request of such patron and shall not be given as change in any other but a gaming transaction. Unless otherwise authorized by 205 CMR 146.09, gaming chips and plaques shall be issued only by dealers to gaming patrons at gaming tables. Gaming chips may be issued by chip persons to patrons seated at a poker table at which a game is in progress or by general cashiers. Gaming plaques and value chips shall be redeemed by gaming patrons only at the cashiers' cage; provided, however, that value chips may be:

- (a) Issued to a patron in payment of a manual slot machine jackpot;
- (b) Exchanged by a patron at the slot booths or with change persons for currency, coin or slot tokens to play the slot machines;
- (c) Exchanged for a gaming check upon a patron request to redeem value chips by mail in any amount. The chips shall be redeemed only by a cage supervisor, in accordance with internal controls which, at a minimum, shall detail procedures for the issuance of the gaming check and the transfer of the surrendered value chips

to the chip bank in a transaction fully supported by proper documentation; and
(d) Exchanged by a patron for a pit counter check redemption as permitted by 205 CMR 148.41(1).

(3) Non-value chips shall be presented for redemption only at the gaming table from which they were issued and shall not be redeemed or exchanged at any other location within the gaming establishment. When non-value chips are presented for redemption, the dealer shall accept them in exchange for an equivalent amount of value chips which may then be used by the patron for gaming in the gaming establishment or redeemed in the same manner as any other value chip.

(4) Each gaming licensee may permit, limit or prohibit the use of value chips in gaming at roulette, provided, however, that:

- (a) No person shall be permitted to wager a value chip with a match play coupon at any roulette table at which match play coupons are permitted to be used; and
- (b) When value chips are in use, it shall be the responsibility of the gaming licensee and its employees to keep an accurate account of the wagers being made at roulette with value chips so that the wagers made by one player are not confused with those made by another player at the table.

(5) Each gaming chip and plaque is solely evidence of a debt that the issuing gaming licensee owes to the person legally in possession of the gaming chip or plaque, and shall remain the property of the issuing gaming licensee. Each gaming licensee shall have the right at any time to demand that the person in possession of the gaming chip or plaque surrender the item for redemption.

(6) Each gaming licensee shall redeem promptly its own genuine gaming chips and gaming plaques presented by a patron in person, except when the gaming chips or plaques were obtained or being used unlawfully. A gaming licensee shall redeem its value chips or gaming plaques by accepting them in exchange for an equivalent amount of cash, except that:

- (a) Upon request by a patron who surrenders value chips or gaming plaques in any amount over \$100.00, a gaming licensee shall exchange them for a gaming check of that gaming licensee in the amount of the value chips or gaming plaques surrendered and dated the day of such redemption; and
- (b) A gaming licensee may apply all or any part of the value chips or gaming plaques presented by a patron to the redemption of any Counter Check or Slot Counter Check drawn by the patron, or to the payment of any returned check, provided that the gaming licensee has given that patron prior written notice of such right of setoff and has obtained the patron's written acknowledgment thereof.

(7) Each gaming licensee shall accept, exchange, use or redeem only gaming chips or plaques that it has issued and shall not knowingly accept, exchange, use or redeem gaming chips or plaques, or objects purporting to be gaming chips or plaques, that have

been issued by any other person, except that a gaming licensee may accept and redeem:

- (a) Gaming chips or plaques issued by another legally operated gaming licensee from a patron upon the patron's representation that such chips or plaques had been purchased or received as payment in a gaming transaction from an employee of such licensee working on the premises; or
- (b) Gaming chips issued by any other legally operated gaming licensee from one of its employees who is authorized to receive gratuities, upon the employee's representation that such chips were received as gratuities in the normal course of his or her duties while on the premises of the gaming licensee.

(8) Employees of a gaming licensee who are authorized to receive gaming chips as personal gratuities may redeem the gaming chips at the cashier's cage or at another secure location in the gaming establishment as approved by the Bureau. Gaming chips redeemed by employees at a non-cage employee redemption site shall be exchanged on a daily basis with the cashier's cage in accordance with the gaming licensee's internal control procedures.

(9) Each gaming licensee shall redeem promptly its own genuine value chips and gaming plaques presented to it by any other legally operated gaming licensee upon the representation that such chips and plaques were received or accepted unknowingly, inadvertently or in error or were redeemed in accordance with the provisions of 205 CMR 146.09(8). Each gaming licensee shall submit to the Bureau a system for the exchange, with other legally operated gaming licensees, of value chips and gaming plaques that are in its possession and that have been issued by any other legally operated gaming licensee, or that it has issued and that are presented to it for redemption by any other legally operated gaming licensee.

(10) Each gaming licensee shall cause to be posted and remain posted in a prominent place on the front of the cashiers' cage and any satellite cage a sign that reads as follows: "By law, gaming chips or plaques issued by another gaming licensee may not be exchanged or redeemed in this gaming establishment."

146.10: Roulette Wheel and Table; Physical Characteristics; Double Zero Roulette Wheel Used as a Single Roulette Wheel

(1) Roulette shall be played on a table having a roulette wheel of not less than 30 inches in diameter at one end of the table and a roulette layout imprinted on the opposite end of the table. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) Each roulette wheel shall be of a single zero variety or a double zero variety.

- (a) Each single zero roulette wheel shall have 37 equally spaced compartments around the wheel where the roulette ball shall come to rest. The roulette wheel

shall also have a ring of 37 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green and the others marked 1 to 36 and colored alternately red and black. Unless otherwise approved by the Bureau, the numbers shall be arranged clockwise around the wheel in the following order: 0, 32, 15, 19, 4, 21, 2, 25, 17, 34, 6, 27, 13, 36, 11, 30, 8, 23, 10, 5, 24, 16, 33, 1, 20, 14, 31, 9, 22, 18, 29, 7, 28, 12, 35, 3, and 26. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color.

(b) Each double zero roulette wheel shall have 38 equally spaced compartments around the wheel where the roulette ball shall come to rest. The roulette wheel shall also have a ring of 38 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green, one marked double-zero (00) and colored green, and the others marked 1 to 36 and colored alternately red and black. Unless otherwise approved by the Bureau, the numbers shall be arranged clockwise around the wheel in the following order: 0, 28, 9, 26, 30, 11, 7, 20, 32, 17, 5, 22, 34, 15, 3, 24, 36, 13, 1, 00, 27, 10, 25, 29, 12, 8, 19, 31, 18, 6, 21, 33, 16, 4, 23, 35, 14, and 2. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color.

(c) If a gaming licensee offers the optional six numbers color wager authorized by ~~Section 1 of the authorized the~~ Rules of the Game of Roulette:

1. The areas on the ring of a single zero roulette wheel shall have one marked zero (0) and colored green, and the others marked in the order specified in 205 CMR 146.10(2)(b), but colored as follows: purple - 4, 21, 2, 25, 17, 34; green - 6, 27, 13, 36, 11, 30; black - 8, 23, 10, 5, 24, 16; blue - 33, 1, 20, 14, 31, 9; gold - 22, 18, 29, 7, 28, 12; and red - 35, 3, 26, 32, 15, 19. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color as approved by the Bureau.

2. The areas on the ring of a double zero roulette wheel shall have one marked zero (0) and colored green, one marked double-zero (00) and colored green, and the others marked in the order specified in 205 CMR 146.10(2)(c)(1), but colored as follows: blue - 30, 11, 7, 20, 32, 17; gold - 5, 22, 34, 15, 3, 24; red - 36, 13, 1, 27, 10, 25; purple - 29, 12, 8, 19, 31, 18; green - 6, 21, 33, 16, 4, 23; and black - 35, 14, 2, 28, 9, 26. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color.

(3) A double zero roulette wheel may be used as a single zero roulette wheel, provided that:

- (a) The "00" wager area on the layout is obscured with a cover or other approved device which clearly indicates that such a wager is not available; and
- (b) Appropriate signage is posted at the roulette table to notify players that:

1. A double zero roulette wheel is being used as a single zero roulette wheel, and that double zero (00) is not an available wager;
2. If the roulette ball comes to rest in a compartment marked double zero (00), the spin will be declared void and the wheel will be spun again; and
3. Wagers on red, black, odd, even, 1 to 18 and 19 to 36 shall be lost if the roulette ball comes to rest in a compartment marked zero (0).

(4) The layout for a roulette table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game; and
- (b) Specific areas for the placement of the wagers ~~authorized~~ required by ~~Section 1 of~~ the authorized Rules of the Game of Roulette.

(5) If a gaming licensee offers an optional wager ~~authorized by~~ pursuant to Section 1 of the authorized Rules of the Game of Roulette, the layout for that roulette table shall also include designated areas for the placement of such wagers.

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

146.11: Roulette Balls

Balls used in gaming at roulette shall be made completely of a non-metallic material and not be less than 12/16 of an inch nor more than 14/16 of an inch in diameter unless otherwise approved by the Bureau.

146.12: Roulette; Inspection Procedures; Security Procedures

(1) Prior to opening a roulette table for gaming activity, a casino supervisor or member of the security department shall:

- (a) Inspect the roulette table and roulette wheel for any magnet or contrivance that would affect the fair operation of such wheel;
- (b) Inspect the roulette wheel to assure that it is level and rotating freely and evenly;
- (c) Inspect the roulette wheel to assure that all parts are secure and free from movement;
- (d) Inspect the roulette ball by passing it over a magnet or compass to assure its non-magnetic quality; and
- (e) Confirm that the layout and signage comply with 205 CMR 146.10(3), if a double zero roulette wheel is being used as a single zero roulette wheel.

(2) If a gaming licensee uses a roulette wheel which has external movable parts, any adjustments to the movable parts shall be made by a gaming establishment supervisor or a member of the gaming establishment maintenance department, in the presence of a security department member. Adjustments to the movable parts of a roulette wheel that

is located on the gaming floor shall only be made when the roulette table is not open to the public or if the roulette wheel is moved to a secure location outside the gaming establishment as approved by the Bureau.

(3) All adjustments shall be completed prior to the inspections required pursuant to 205 CMR 146.12(1).

(4) The gaming licensee may replace any of the movable parts at any time, provided, however, if any one or more of the movable parts are external then an inspection must be completed in accordance with 205 CMR 146.12(1) and notification of what was replaced provided to the Bureau, prior to reopening the roulette wheel and table for gaming activity.

(5) A log of adjustments shall be maintained which shall include, at a minimum, the date, the roulette table number, whether an adjustment or replacement was completed and the signature of the person making the adjustment or replacement.

(6) When a roulette table is not open for gaming activity, the roulette wheel shall be secured by placing a cover over the entire wheel and securely locking such cover to the roulette table.

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

(1) Blackjack shall be played at a table having on one side places for the players and on the opposite side a place for the dealer. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

- (a) The name or trade name of the gaming licensee offering the game; and
- (b) Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number, with the exception of the 6 to 5 blackjack variation, which shall contain no more than six betting areas.

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

- (a) Blackjack pays 3 to 2;
- (b) Dealer must draw to 16 and stand on all 17s or Dealer must hit on soft 17s; and
- (c) Insurance pays 2 to 1.

(4) If a gaming licensee offers blackjack rule variations, the blackjack layout shall have imprinted on it, at a minimum, the following inscriptions instead of the inscriptions set forth in 205 CMR 146.13(3):

- (a) Blackjack pays 1 to 1;

- (b) Dealer must draw to 16 and stand on all 17s or Dealer must hit on soft 17s; and
- (c) Dealer's hole card dealt face up.

(5) Each blackjack table shall have a drop box and a tip box attached to it with the location of said boxes on the same side of the gaming table, but on opposite sides of the dealer, as previously approved by the Bureau.

(6) If a gaming licensee offers one of the permissible additional wagers ~~authorized by pursuant to Section 17 of~~ the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the additional wager and shall have the payout odds for the additional wager imprinted on the layout or a separate sign located at the table containing the payout odds for the additional wager.

(7) A blackjack table may have attached to it an approved card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack in accordance with ~~Section 6 of~~ the authorized Rules of the Game ~~for of~~ Blackjack. If a blackjack table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day to insure that there has been no tampering with the device and that it is in proper working order. A card reader device may not be used on a blackjack table offering a progressive blackjack wager pursuant to ~~Section 19 of~~ the authorized Rules of the Game of Blackjack.

(8) Notwithstanding the requirements of 205 CMR 146.13(2), if a gaming licensee offers multiple action blackjack in accordance with the ~~requirements of Section 18 of the~~ authorized Rules of the Game of Blackjack, the blackjack layout shall contain, at a minimum:

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

(9) In order to collect the cards at the conclusion of a round of play as required by ~~Section 6 of~~ the authorized Rules of the Game of Blackjack and at such other times as provided in 205 CMR 146.49, each blackjack table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall

equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used to play the game at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used to play the game at that table. Whenever a double shoe is used at a blackjack table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements for that table's discard rack shall be determined from the number of decks used in one side of the shoe.

(10) If a gaming licensee offers a progressive blackjack wager pursuant to ~~Section 19 of~~ the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the progressive blackjack wager and shall contain the following equipment:

- (a) A separate acceptor device for the placement of a progressive wager. Each acceptor device shall have a light which shall illuminate upon placement and acceptance of a gaming chip;
- (b) A method to ensure that only one progressive blackjack wager is made per person, per round of play;
- (c) A device or method to indicate that a progressive blackjack wager has been won;
- (d) A sign describing the winning wagers and the payouts to be awarded on winning progressive blackjack wagers at a location near the table;
- (e) A table controller panel which shall be equipped with a "lock-out" button which, once activated by the dealer, will prevent any player's gaming chip from being recognized in the acceptor device; and
- (f) A mechanical, electrical or electronic table inventory return device which shall permit all gaming chips deposited into the acceptor devices to be collected and immediately returned to a designated area within the table inventory container prior to the dealing of a hand. The table inventory return device shall be designed and constructed to contain any feature the Bureau may require to maintain the security and integrity of the game. The procedures for the operation of all functions of the table inventory return device shall be submitted to the Bureau.

(11) If a gaming licensee offers a blackjack bonus wager pursuant to ~~Section 20 of~~ the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the blackjack bonus wager, and shall contain the following equipment:

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

1. One table controller shall control no more than four blackjack tables. Procedures for the operation, security and control of the table controller shall be submitted to the Bureau prior to implementation;
2. Whenever it is required that a table controller or any device connected thereto which may affect the operation of the blackjack bonus system be accessed or opened, certain information shall be recorded on a form entitled "Controller Access Authorization Log," which shall include, at a minimum, the date, time, purpose of accessing or opening the controller or device, and the signature of the authorized employee accessing or opening the machine or device. The Controller Access Authorization Log shall be maintained in the same secured location as the table controller, and shall have recorded thereon a sequential number and the manufacturer's serial number or the asset number of the controller;

- (b) A blackjack bonus button, which shall be located at the table by the dealer, and used by each player with a winning blackjack bonus wager to generate a bonus amount to be won by that player. The blackjack bonus button shall be attached to the table in a manner that will enable the dealer to place the blackjack bonus button directly in front of each winning player;
- (c) A blackjack bonus display, which shall be located at the table and shall display the amount of the winning blackjack bonus on both sides of the device, so that the amount is visible to all players, the dealer and supervisory personnel; and
- (d) A sign containing the amount of the blackjack bonus wager, as well as the minimum and maximum possible blackjack bonus amounts to be awarded, pursuant to 205 CMR 147.03.

(12) If a gaming licensee offers a streak wager pursuant to ~~Section 22 of~~ the authorized Rules of the Game of Blackjack, the blackjack table shall also contain:

- (a) A layout which shall include, at a minimum:
 1. Four additional separate designated betting areas for each of the player positions at the table, which areas shall be numbered "2" through "5"; and
 2. The inscriptions "Two consecutive wins pays 3 to 1," "Three consecutive wins pays 7 to 1," "Four consecutive wins pays 17 to 1," and "Five consecutive wins pays 37 to 1"; and
- (b) The following equipment:
 1. Marker buttons ("lammers") with the gaming licensee's name or logo, to indicate how many consecutive blackjack hands a patron has won or another device or method approved by the Bureau; and
 2. A sign containing the permissible amount of the streak wager, posted pursuant to 205 CMR 147.03.

(13) If a gaming licensee offers a match-the-dealer wager pursuant to ~~Section 23 of~~ the authorized Rules of the Game of Blackjack, the blackjack table shall contain:

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

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

(a) The layout shall have imprinted on it, at a minimum, the following inscriptions:

- 1. Blackjack pays 6 to 5;
- 2. Dealer must draw to 16 and soft 17 or Dealer must hit on soft 17s; and
- 3. Insurance pays 2 to 1; and

(b) A notice shall be posted in accordance with 205 CMR 147.03 indicating that all wagers shall be made in increments of \$5.00 as required by ~~Section 3 of~~ the authorized Rules of the Game of Blackjack.

(15) If a gaming licensee offers the twenty point bonus wager pursuant to ~~Section 24 of~~ the authorized Rules of the Game of Blackjack, the layout otherwise required by this section shall also include, at a minimum, an additional designated betting area for the twenty point bonus wager at each of the player positions at the table. The blackjack table shall also contain a sign setting forth the payout odds for the twenty point bonus wager.

(16) If a gaming licensee offers the option set forth in ~~Section 12 of~~ the authorized Rules of the Game of Blackjack that requires the dealer to draw additional cards on a soft 17, the blackjack layout shall have imprinted on it, at a minimum, the following inscription instead of the inscription set forth in 205 CMR 146.13(3)(b):

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

(17) If a gaming licensee offers the optional bonus wager pursuant to ~~Section 25 of~~ the authorized Rules of the Game of Blackjack, the layout otherwise required by this section shall include, at a minimum, an additional designated betting area for such wager at each of the player positions at the table. In addition, payout odds for the optional bonus wager shall be inscribed on the layout or posted on a sign at each such blackjack table.

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

146.14: Three-card Poker Table; Physical Characteristics

(1) Three-card poker shall be played at a table having betting positions for the players on one side of the table and a place for the dealer on the opposite side. Such betting positions shall not exceed nine in number depending on the size of the table.

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

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

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

146.15: Spanish 21 Table; Physical Characteristics

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

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

- (a) The name or trade name of the gaming licensee offering the game;
- (b) A separate designated betting area at each betting position for the placement of the following wagers:
 - 1. The required Spanish 21 wager; and
 - 2. An optional match-the-dealer wager;
- (c) The following inscriptions:
 - 1. "Blackjack Pays 3 to 2";
 - 2. "Dealer Must Draw to 16 and Stand on All 17's";
 - 3. "Insurance Pays 2 to 1";
- (d) The payout odds for each of the wagers listed in ~~Section 5 of~~ the authorized Rules of the Game of Spanish 21; and
- (e) The payout odds for the match-the-dealer wager, unless the odds are included in the sign required by 205 CMR 146.15(3).

- (3) A gaming licensee shall post a sign at each Spanish 21 table, which explains:
- (a) That doubled down hands and split hands are not eligible for the additional payouts in ~~Section 5 of~~ the authorized Rules of the Game of Spanish 21; and
 - (b) The payout odds for the match-the-dealer wager, if those payout odds are not imprinted on the layout.
- (4) Each Spanish 21 table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (5) In order to collect the cards at the conclusion of a round of play as required by ~~Section 7 of~~ the authorized Rules of the Game of Spanish 21 and at such other times as provided in 205 CMR 146.49, each Spanish 21 table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.
- (6) A Spanish 21 table may have attached to it, as approved by the Bureau, a card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack ~~in accordance Section 1 of~~ pursuant to the definition of "blackjack" in the authorized Rules of the Game of Spanish 21. If a Spanish 21 table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

146.16: Blackjack Switch Table; Physical Characteristics

- (1) Blackjack switch shall be played at a table having betting positions for no more than five players on one side of the table and a place for the dealer on the opposite side.
- (2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a blackjack switch table shall have imprinted thereon, at a minimum, the following:
- (a) The name or trade name of the gaming licensee offering the game;
 - (b) Two adjacent designated betting areas at each betting position for the placement of the required two initial blackjack switch wagers;
 - (c) A separate designated area on the layout at each betting position for the placement of the optional match wager;
 - (d) The following inscriptions, unless they are included on the sign required by 205 CMR 146.16(3):

1. "Blackjack pays 1 to 1";
 2. "Insurance pays 2 to 1";
 3. "Dealer must hit a soft 17"; and
 4. "Dealer pushes on 22"; and
- (e) The payout odds for the optional match wager, unless they are included on the sign required by 205 CMR 146.16(3).

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

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

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

(5) ~~In order to collect the cards at the conclusion of a round of play as required by 205 CMR 147.6(i), e~~Each blackjack switch table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

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

146.17: Craps and Mini-craps Tables; Physical Characteristics

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

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

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

- (b) Specific areas designated for the placement of wagers as ~~authorized by Section 2 of~~ described in the authorized Rules of the Game of Craps and Mini Craps; and
- (c) The words “No call bets.”

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

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

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

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

(1) Baccarat shall be played on a table having numbered places for 10 to 14 seated players.

(2) Baccarat-chemin de fer shall be played on a table having numbered places for nine to 14 seated players.

(3) Mini-baccarat shall be played at a table having on one side places for a maximum of nine seated players, and on the opposite side a place for the dealer; provided however, that unless the cards are changed after each shoe, a mini-baccarat table using the dealing procedure in the authorized Rules of the Game of Minibaccarat shall have places for a maximum of six seated players. The dimensions of a mini-baccarat table shall be submitted to the Bureau.

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

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

right side of the area designated for the placement of a “Tie Hand” wager when viewed by the player; and

2. An inscription identifying the payout odds for the dragon 7 wager unless the gaming licensee chooses to comply with 205 CMR 146.18(8).

(5) If marker buttons are used for the purpose of marking vigorish, these marker buttons shall be placed in the table inventory float container or in a separate rack designed for the purpose of storing marker buttons and such rack shall be placed in front of the table inventory float container during gaming activity.

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

(7) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the optional bonus wager authorized by the authorized Rules of the Game of Baccarat or Minibaccarat listing the payout odds for the optional bonus wager.

(8) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the dragon 7 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively, indicating the payout odds for the dragon 7 wager.

(9) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the panda 8 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively, indicating the payout odds for the panda 8 wager.

146.19: Big Six Wheel and Layout; Physical Characteristics

(1) Gaming at Big Six shall be conducted at a wheel circular in shape and no less than five feet in diameter. The rim of the wheel shall be divided into 54 equally spaced sections with 23 sections containing a \$1.00 bill, 15 sections containing a \$2.00 bill, eight sections containing a \$5.00 bill, four sections containing a \$10.00 bill, two sections containing a \$20.00 bill, one section containing a picture of a flag or the name or logo of the gaming licensee, and one section containing a picture of a joker, each of which sections shall be covered with transparent protective cover.

(2) The sections required by 205 CMR 146.19(1) shall be arranged clockwise around the rim of the wheel in the following order: joker, \$1, \$2, \$1, \$5, \$2, \$1, \$10, \$1, \$5, \$1, \$2, \$1, \$20, \$1, \$2, \$1, \$5, \$2, \$1, \$10, \$1, \$2, \$5, \$1, \$2, \$1, flag, \$2, \$5, \$2, \$1, \$2, \$1, \$10, \$1, \$5, \$1, \$2, \$1, \$20, \$1, \$2, \$1, \$5, \$2, \$1, \$10, \$1, \$2, \$5, \$1, \$2, and \$1.

(3) Each section of the Big Six Wheel shall also display the payout odds for the wager contained therein, pursuant to the authorized Rules of the Game of Big Six Wheel.

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

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

- (a) The name or trade name of the Gaming licensee offering the game;
- (b) Spaces which shall be used by patrons to place their wagers, and which shall contain:

- 1. Depictions of a \$1.00 bill, \$2.00 bill, \$5.00 bill, \$10.00 bill, and \$20.00 bill, or numbers representing those monetary denominations;
- 2. A flag or the name or logo of the gaming licensee, as it appears on the Big Six Wheel; and
- 3. A joker; and

- (c) The payout odds for each of the permitted wagers.

146.20: Sic Bo Table; Sic Bo Shaker; Physical Characteristics

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

(2) Each sic bo table shall have an electrical device which, when the numeric value of each die has been entered, shall cause the winning combinations to be illuminated. The sic bo table shall have an area, which depicts all permissible wagers pursuant to the authorized Rules of the Game of Sic Bo. Each combination shall have the capability to be illuminated, if it is a winning combination, after the numeric value of each die has been entered into the electrical device by the dealer.

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

- (a) The name or trade name of the gaming licensee; and
- (b) Specific areas designated for the placement of the wagers authorized by the authorized Rules of the Game of Sic Bo; and
- (c) The payout odds currently being offered in accordance with the authorized Rules of the Game of Sic Bo.

(4) Sic bo shall be played with a sealed container, to be known as a "sic bo shaker," which shall be used to shake the dice in order to arrive at the winning combinations.

- (a) A manual sic bo shaker shall be designed and constructed to contain any

feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

1. The sic bo shaker shall have a compartment to secure the three dice required by the authorized Rules of the Game of Sic Bo and a separate cover which conceals the dice while the dealer is shaking the sic bo shaker. The compartment to secure the three dice shall be transparent and the cover which conceals the dice shall be opaque;
 2. The sic bo shaker shall have the capability of being sealed or locked in order to ensure the integrity of the dice contained therein;
 3. The sic bo shaker shall have the name or trade name of the gaming licensee or identifying logo imprinted or impressed thereon; and
 4. The sic bo shaker shall be secured to the sic bo table when the table is open for gaming activity.
- (b) An automated sic bo shaker may be used in the game of sic bo, provided that:
1. The shaker meets the requirements of 205 CMR 146.20(4)(a), except that a separate opaque cover shall not be used; and
 2. The shaker, its location on the sic bo table and the procedures for shaking the dice are submitted to the Bureau.

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

- (1) Pai gow poker shall be played at a table having on one side places for the players and on the opposite side a place for the dealer.
- (2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a pai gow poker table shall contain, at a minimum:
 - (a) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (b) Two separate areas located below each betting area which shall be designated for the placement of the high and second highest or low hands of that player;
 - (c) If a gaming licensee offers the optional bonus wager and/or insurance wager authorized by the authorized Rules of the Game of Pai Gow Poker:
 1. A separate area for each player, located to the right of the numbered betting areas, designated for the placement of a bonus wager by each player;
 2. A separate area for each player, located to the left of the numbered betting areas, designated for the placement of an insurance wager by each player;
 3. Notice of signage for payout odds for the bonus wager and insurance wager and payout amounts for the "envy bonus" as defined at the authorized Rules of the Game of Pai Gow Poker; and

4. The inscription indicating the payout limit per round of play for the bonus wager and the insurance wager established by the gaming licensee pursuant to the authorized Rules of the Game of Pai Gow Poker or a generic inscription indicating the wagers are subject to the posted payout limit;

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

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

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

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

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

1. A separate area for each player, located to the right of the area for the placement of a player's pai gow wager, designated for the placement of the imperial pai gow bonus wager; and

2. An inscription or notice of signage, as approved by the Bureau, for payout odds for both the "player hand bonus" and "banker hand bonus" as defined in the authorized Rules of the Game of Pai Gow Poker.

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

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

(b) For the optional wagers authorized by the authorized Rules of the Game of Pai Gow Poker, the payout odds for each bonus wager.

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

(5) Pursuant to the authorized Rules of the Game of Pai Gow Poker, pai gow poker may be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of pai gow poker is dealt in order to determine the starting position for the dealing or delivery of the cards. The pai gow shaker shall be

designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

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

(6) As an alternative to using the shaker and dice described in 205 CMR 146.21(5) a gaming licensee may, unless the gaming licensee offers the optional bonus wagers authorized by the authorized Rules of the Game of Pai Gow Poker, determine the starting position for the dealing or delivery of the cards in pai gow poker by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

(7) If a gaming licensee offers a progressive payout wager pursuant to 205 CMR 138.62, the pai gow poker table shall include the following features:

- (a) A separate acceptor device mounted for the placement of the progressive wager, which acceptor device shall have a light that illuminates upon the insertion and acceptance of a gaming chip;
- (b) A sign describing each winning progressive payout wager and the payout to be awarded therefore;
- (c) A table controller panel located in an area of the table as approved by the Bureau and which shall be equipped with a "lock-out" button that, once activated by the dealer as set forth in 205 CMR 138.62, shall prevent any player from depositing a gaming chip in the acceptor device; and
- (d) A mechanical, electrical or electronic table inventory return device which shall permit all gaming chips deposited into the acceptor device referenced in 205 CMR 146.13(7)(a) to be collected and immediately returned to a designated area within the table inventory container prior to the dealing of a hand. The table inventory return device shall be designed and constructed to contain any feature the may require to maintain the security and integrity of the game. The procedures for the operation of all functions of the table inventory return device shall be submitted to the Bureau.

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

- (a) An even wager;
- (b) An odd wager;
- (c) A match wager;
- (d) A double wager;

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

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

- (1) Pai gow shall be played at a table having on one side places for the players and on the opposite side a place for the dealer.
- (2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a pai gow table shall contain, at a minimum:
 - (a) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (b) A separate area, located to the left of the dealer, for the placement of four tiles which shall be referred to as the "dead hand"; and
 - (c) The name or trade name of the gaming licensee offering the game.
- (3) Each pai gow table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(4) Pai gow shall be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of pai gow is dealt in order to determine the starting position for the dealing of the pai gow tiles. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

(a) The pai gow shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and

(b) The pai gow shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.

(5) If a gaming licensee offers the dragon's eye variation of pai gow pursuant to the authorized Rules of the Game of Pai Gow, in addition to the requirements set forth in 205 CMR 146.22 the layout shall include:

(a) Five separate betting areas at each player position for the placement of the following five optional wagers:

1. An even wager;
2. An odd wager;
3. A match wager;
4. A double wager; and
5. A triple wager; and

(b) A separate location to the left of dealer's table inventory container with six areas for the dealer's placement of player dice bonus wagers, which areas are designated with the numeric player position at the table.

146.24: Poker Table; Physical Characteristics

(1) Poker shall be played on a table which is oval in shape and which has places for up to 11 players and a dealer. Each poker table shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

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

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

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

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

146.25: Double Down Stud Table; Physical Characteristics

(1) Double down stud shall be played on a table having seven places on one side for the players, and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

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

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

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

146.26: Caribbean Stud Poker Table; Physical Characteristics

(1) Caribbean stud poker shall be played on a table having betting positions for six or seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting position for the placement of "ante" wagers;

- (c) A separate designated betting area located immediately behind each ante betting area for the placement of "bet" wagers; and
- (d) The inscriptions "Payout Limit of \$5,000 per Hand on Bet Wagers" and "Bet Wager Void Unless Dealer has Ace/King or Better."

(3) A sign shall be posted at each Caribbean stud poker table that explains the details of the \$5,000 payout limit ~~authorized-permitted~~ by ~~Section 12 of~~ the authorized Rules of the Game of Caribbean Stud Poker.

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

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

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

146.27: Let It Ride Poker Table; Physical Characteristics

(1) Let it ride poker shall be played on a table having betting positions for seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

- (a) The name or trade name of the gaming licensee;
- (b) Three separate designated betting areas at each betting position for the placement of wagers in accordance with the authorized Rules of the Game of Let it Ride Poker;
- (c) A separate designated area at each betting position for the placement of the cards of each player;
- (d) A separate designated area located directly in front of the table inventory container for the placement of the community cards;

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

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

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

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

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

146.29: Fast Action Hold 'em Table; Physical Characteristics

(1) Fast action hold 'em shall be played at a table having betting positions for the players on one side of the table and a place for the dealer on the opposite side. Such betting positions shall not exceed nine in number depending on the size of the table. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

- (2) The layout for the fast action hold 'em table (the layout) shall include, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position;
 - (c) A separate area located immediately to the right of each betting area designated

for the placement of cards to be discarded by a player pursuant to the authorized Rules of the Game of Fast Action Hold 'Em;

- (d) Five separate areas aligned in a row in the center of the layout for placement of the five community cards; and
- (e) An inscription indicating that a "natural" pays five to one.

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

146.30: Casino War Table; Physical Characteristics

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

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

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

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

146.31: Colorado Hold 'em Poker Table; Physical Characteristics

(1) Colorado hold 'em poker shall be played at a table having betting positions for six or seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting position for ante and bet wagers, and if a gaming licensee offers a bonus wager pursuant to the authorized Rules of the Game of Colorado Hold 'Em Poker, a separate designated betting area for the bonus wager;
- (c) A separate area located immediately to the left of each betting area designated for the placement of the card to be discarded by a player pursuant to the authorized Rules of the Game of Colorado Hold 'Em Poker or;
- (d) Three separate areas aligned in a row in the center of the layout for placement

of the three community cards; and

(e) The payout odds for all winning authorized wagers, including an “immediate winner” as defined at the authorized Rules of the Game of Colorado Hold ‘Em Poker.

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

146.32: Boston 5 Stud Poker Table; Physical Characteristics

(1) Boston 5 stud poker shall be played on a table having positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a Boston 5 stud poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting position for the placement of ante wagers;
- (c) A separate designated area shall be located immediately to the right of each ante betting area for the placement of first wagers;
- (d) A separate designated area shall be located immediately to the right of each first wager betting area for the placement of second wagers;
- (e) A separate designated area shall be located immediately above each ante betting area for the placement of optional bonus wagers; and
- (f) Notice of signage for payout odds for all authorized wagers.

(3) A sign shall be posted at each Boston 5 stud poker table that lists the payout odds for all authorized wagers.

(4) Each Boston 5 stud poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.33: Double Cross Poker Table; Physical Characteristics

(1) Double cross poker shall be played on a table having positions for seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting position for the placement of the ante wager;

- (c) Four separate designated betting areas at each betting position for the placement of raise wagers, with one raise wager area located to the left of the ante betting area, one raise wager area located to the right of the ante betting area, one raise wager area located above the ante betting area and one raise wager area located below the ante betting area, so that the ante betting area and the four raise wager areas, when viewed from above, form the shape of a cross;
- (d) A separate designated area at each betting position for the placement of a three-card wager, located to the right of the designated areas for the placement of ante and raise wagers;
- (e) A separate designated area, located between the table inventory container and the player betting areas on the right hand side of the dealer, for the placement of the five community cards in the same type of cross formation created by the five wager areas described in 205 CMR 146.33(2)(b)-(c);
- (f) A separate designated area, located between the table inventory container and the player betting areas on the left hand side of the dealer, for the placement of the dealer's two cards; and
- (g) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds for all authorized wagers posted at each double cross poker table.

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

146.34: Double Attack Blackjack Table; Physical Characteristics

- (1) Double attack blackjack shall be played on a table having positions for six or seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a double attack blackjack table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee; and
 - (b) Separate designated betting areas at each betting position for the placement of the initial wager, the double attack wager, and the optional bonus wager.
- (3) The following inscriptions shall appear on the double attack blackjack layout:
 - (a) Blackjack pays 1 to 1;
 - (b) Dealer must draw to 16, and stand on all 17's; and
 - (c) Insurance pays 5 to 2.
- (4) Payout odds for the optional bonus wager authorized by the authorized Rules of the Game of Double Attack Blackjack shall be inscribed on the layout or posted on a sign at each double attack blackjack table.

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

146.35: Four-Card Poker Table; Physical Characteristics

- (1) Four-card poker shall be played on a table having positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a four-card poker table shall contain, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) Separate designated betting areas at each betting position for the placement of the ante wager and the play wager;
 - (c) Separate designated betting areas at each betting position for the placement of the aces up wager; and
 - (d) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds for all authorized wagers posted at each four-card poker table.
- (4) Each four-card poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

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

- (1) Texas hold 'em bonus poker shall be played on a table having positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Texas hold 'em bonus poker table shall contain, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each player position for the placement of ante wagers;
 - (c) Three separate designated areas at each player position for the placement of flop, turn and river wagers, which areas shall be located immediately above the ante betting area as viewed by a player;
 - (d) A separate designated area at each player position for the placement of an optional bonus wager, which area shall be located immediately above and to the right of the flop wager betting area as viewed by a player;
 - (e) A separate designated area for the placement of the five community cards, which area shall be located in the center of the table between the table inventory container and the player betting areas;
 - (f) A separate designated area for the placement of the dealer's two cards, which

area shall be located between the table inventory container and the designated area for the community cards described in 205 CMR 146.36(2)(e); and

(g) An inscription indicating that an ante wager shall receive a payout if a winning hand has a qualifying rank, as elected by the gaming licensee, of straight or higher or flush or higher.

(3) A sign that lists the payout odds for all authorized wagers shall be posted at each Texas hold 'em bonus poker table.

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

146.37: Flop Poker Table; Physical Characteristics

(1) Flop poker shall be played on a table having positions for nine players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

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

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

(b) Three separate designated betting areas at each player position for the placement of ante, pot and flop wagers, with the pot wager area closer to the dealer than the ante and flop wager areas;

(c) An arc extending across all player positions with the areas designated for players' pot wagers on the side of the arc closer to the dealer and with the areas designated for players' ante and flop wagers on the side of the arc farther from the dealer;

(d) A designated area at each player position for the placement of player cards located between the designated areas for the placement of the ante wager and the flop wager;

(e) A designated area at the center of the gaming table for the placement of the three community cards;

(f) A designated area at the center of the gaming table for the placement of collected pot wagers, which area shall be located farther from the dealer than the designated area described in 205 CMR 146.37(2)(b); and

(g) Unless the gaming licensee complies with 205 CMR 146.37(3), an inscription listing the payout odds for ante and flop wagers and indicating that the highest ranking hand wins all pot wagers.

(3) If the information required by 205 CMR 146.37(2)(g) is not inscribed on the layout, a sign shall be posted at each flop poker table that lists the payout odds for ante and flop wagers and indicating that the highest ranking hand wins all pot wagers.

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

(5) In addition to the requirements of 205 CMR 146.37(2), if a gaming licensee offers the three-card bonus wager, the flop poker table shall include a designated betting area at each player position for the placement of the three-card bonus wager. The flop poker table shall also contain a sign setting forth the payout odds for the three-card bonus wager.

146.38: Two-Card Joker Poker Table; Physical Characteristics

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

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

- (a) The name or trade name of the gaming licensee;
- (b) Four separate designated betting areas at each player position for the placement of the ante wager, call wager, pair up wager and super flush bonus wager;
- (c) An inscription identifying the payout odds for all authorized wagers unless the gaming licensee chooses to comply with 205 CMR 146.38(3); and
- (d) An inscription indicating that a joker may only be used to complete a pair unless the gaming licensee chooses to comply with 205 CMR 146.38(4).

(3) If the payout odds are not inscribed on the layout as provided in 205 CMR 146.38(2)(c) a sign identifying the payout odds for all authorized wagers shall be posted at each two-card joker poker table.

(4) If the layout is not inscribed with the information described in 205 CMR 146.38(2)(d) a sign shall be posted at each two-card joker poker table indicating that a joker may only be used to complete a pair.

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

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

(1) Asia poker shall be played at a table having places for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

- (2) The layout for an Asia poker table shall contain, at a minimum, the following:
- (a) The name or trade name of the gaming licensee;
 - (b) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (c) Three separate areas located below each betting area, which shall be designated for the placement of the high, medium and low hands of that player and configured with the high hand area farthest from the betting area, the low hand area closest to the betting area, and the medium hand area arrayed between the high hand area and the low hand area; and
 - (d) Three separate areas located in front of the table inventory container designated for the placement of the high, medium and low hands of the dealer and configured with the dealer's high hand area closest to the dealer, the dealer's low hand area farthest from the dealer, and the dealer's medium hand area arrayed between the dealer's high hand area and the dealer's low hand area.
- (3) Each Asia poker table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of the dealer.
- (4) Pursuant to the authorized Rules of the Game of Asia Poker, Asia poker may be played with a container, to be known as an "Asia poker shaker," which shall be used to shake three dice before each hand of Asia poker is dealt in order to determine the starting position for the dealing or delivery of the cards. The Asia poker shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
- (a) The Asia poker shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The Asia poker shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (5) As an alternative to using the shaker and dice described 205 CMR 146.39(4), a gaming licensee may determine the starting position for the dealing or delivery of the cards in Asia poker by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

146.40: Ultimate Texas Hold 'em Table; Physical Characteristics

- (1) Ultimate Texas hold 'em shall be played on a table having positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for an ultimate Texas hold 'em table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Four separate designated betting areas at each player position for the placement of ante, blind, play and trips wagers, configured with the trips wager area closest to the dealer, the play wager area farthest from the dealer, the ante wager area arrayed between the trips wager area and the play wager area, and the blind wager area to the right of and separated from the ante wager area by an “=” symbol;
 - (c) A separate designated area for the placement of the five community cards, which area shall be located in the center of the table between the table inventory container and the player betting areas;
 - (d) A separate designated area for the placement of the dealer's two cards, which area shall be located between the table inventory container and the designated area for the community cards described in 205 CMR 146.40(2)(c);
 - (e) An inscription indicating that an ante wager shall push if the dealer has less than a pair; and
 - (f) Unless the gaming licensee complies 205 CMR 146.40(3) an inscription at each player position describing the following:
 1. The payout odds for blind and trips wagers;
 2. That a blind wager shall not be paid unless the player's hand ranks higher than the dealer's hand; and
 3. The rules governing the required amount of a play wager as a multiple of the player's ante wager (three or four times the ante if made prior to any community cards being dealt; two times the ante if made after the flop is dealt but prior to the final two community cards being dealt; or equal to the ante if made after all community cards are dealt but prior to the dealer's cards being revealed).
- (3) If the information required by 205 CMR 146.40(2)(f) is not inscribed on the layout, a sign shall be posted at each ultimate Texas hold 'em table that sets forth such information.
- (4) Each ultimate Texas hold 'em table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.41: Winner's Pot Poker Table; Physical Characteristics

- (1) Winner's pot poker shall be played on a table having positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a winner's pot poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Four separate designated betting areas at each player position for the placement of ante, bet, double and jacks plus bonus wagers, configured in an array so that the jacks plus bonus wager area is closest to the dealer, the double wager area is second closest to the dealer, the bet wager area is third closest to the dealer, and the ante wager area is farthest from the dealer;
 - (c) Three separate designated betting areas for the placement of the ante, bet and double wagers of the dealer, configured in an array in front of the dealer so that the double wager area is closest to the dealer, the bet wager area is the second closest to the dealer, and the ante wager area is farthest from the dealer;
 - (d) A designated area at each player position for the placement of the face up cards of the player, which area shall be located to the left of and adjacent to the wagering areas of the player;
 - (e) A designated area at the center of the gaming table for the placement of the face up cards of the dealer;
 - (f) A designated area at the center of the gaming table for the placement of the collected wagers comprising the winner's pot; and
 - (g) Unless the gaming licensee complies with 205 CMR 146.41(3), inscriptions:
 1. Listing the payout odds for the jacks plus bonus wager; and
 2. Indicating that the winner's pot shall be awarded to the highest ranking hand of a player or the dealer.
- (3) If the information required by 205 CMR 146.41(2)(g) is not inscribed on the layout, a sign shall be posted at each winner's pot poker table that lists the payout odds for the jacks plus bonus wager and indicates that the winner's pot shall be awarded to the highest ranking hand of a player or the dealer. In addition, a sign shall be posted at each winner's pot poker table indicating that:
 - (a) The ante wager of a player who folds after the first three cards are dealt does not increment the winner's pot and is placed in the table inventory container;
 - (b) The percentage or, if applicable, the dollar amount of the commission that shall be deducted from the winner's pot and placed in the table inventory container; and
 - (c) The outcome of a jacks plus bonus wager of a player who has folded his or her hand shall be determined on the cards dealt to the player prior to folding.

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

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

- (1) Supreme pai gow shall be played at a table having places for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a supreme pai gow table shall contain, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) Six separate designated betting areas for the players at the table for placement of the supreme pai gow wager with each area being numbered one through six;
 - (c) Two separate areas located below each betting area which shall be designated for the placement of the high and low hands of that player and configured with the high hand area farther from the betting area;
 - (d) Two separate areas located in front of the table inventory container designated for the placement of the high and low hands of the dealer and configured with the dealer's high hand closer to the dealer; and
 - (e) A separate designated area at each player position for placement of the bonus wager, which area shall be located immediately above and to the right of the supreme pai gow wagering area as viewed by the player.
- (3) Each supreme pai gow table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (4) Pursuant to the authorized Rules of the Game of Supreme Pai Gow, supreme pai gow may be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of supreme pai gow is dealt in order to determine the starting position for the dealing or delivery of the cards. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
- (a) The pai gow shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The pai gow shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (5) As an alternative to using the shaker and dice described in 205 CMR 146.42(4), a gaming licensee may determine the starting position for the dealing or delivery of the cards in supreme pai gow by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any

computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

146.43: Mississippi Stud; Physical Characteristics

- (1) Mississippi stud shall be played on a table having betting positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Mississippi stud table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position for the placement of the ante wager;
 - (c) Three separate designated betting areas at each betting position for the placement of the 3rd street, 4th street and 5th street wagers, which areas shall be located closer to the player than the ante wager betting area and, when viewed by the player, arrayed from left to right;
 - (d) Inscriptions at each betting position providing that:
 1. All bet wagers shall be in an amount equal to one, two or three times the amount of the player's ante; and
 2. The payout odds for all authorized wagers; and
 3. Three separate designated areas in front of the dealer for the placement of the community cards, with one area inscribed "3rd street," a second area inscribed "4th street," and a third area inscribed "5th street."
- (3) Each Mississippi stud table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of, the dealer.

146.44: Red Dog Table; Physical Characteristics

- (1) Red dog shall be played at a table having on one side places for no more than seven players and on the opposite side a place for the dealer. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a red dog table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee offering the game;
 - (b) Two separate designated betting areas for each player, clearly marked to distinguish between the original wager and the raise wager, and situated so that the betting area for the raise wager is closer to the player than the betting area for the original wager;
 - (c) An area designated for the placement of the first, second and third card; and
 - (d) The payout odds currently being offered in accordance with the authorized

Rules of the Game of Red Dog.

- (3) Each red dog table shall have a drop box and a tip box attached to it with the location of said boxes on the same side of the gaming table but on opposite sides of the dealer.

146.45: Dice: Physical Characteristics

- (1) Except as otherwise provided in 205 CMR 146.45(2), each die used in gaming shall:
 - (a) Be formed in the shape of a perfect cube and of a size no smaller than 0.750 of an inch on each side nor any larger than 0.775 of an inch on each side;
 - (b) Be transparent and made exclusively of cellulose except for the spots, name or trade name of the gaming licensee and serial number or letters contained thereon;
 - (c) Have the surface of each of its sides perfectly flat and the spots contained in each side perfectly flush with the area surrounding them;
 - (d) Have all edges and corners perfectly square and forming perfect 90 degree angles;
 - (e) Have the texture and finish of each side exactly identical to the texture and finish of all other sides;
 - (f) Have its weight equally distributed throughout the cube and no side of the cube heavier or lighter than any other side of the cube;
 - (g) Have its six sides bearing white circular spots from one to six respectively with the diameter of each spot equal to the diameter of every other spot on the die;
 - (h) Have spots arranged so that the side containing one spot is directly opposite the side containing six spots, the side containing two spots is directly opposite the side containing five spots and the side containing three spots is directly opposite the side containing four spots; each spot shall be placed on the die by drilling into the surface of the cube and filling the drilled out portion with a compound which is equal in weight to the weight of the cellulose drilled out and which forms a permanent bond with the cellulose cube, and shall extend into the cube exactly the same distance as every other spot extends into the cube to an accuracy tolerance of .0004 of an inch; and
 - (i) Have imprinted or impressed thereon the name or trade name of the gaming licensee in which the die is being used.
- (2) Each die used in gaming at pai gow, pai gow poker, supreme pai gow or Asia poker shall comply with the requirements 205 CMR 146.45(1) except as follows:
 - (a) Each die shall be formed in the shape of a perfect cube and of a size no smaller than .637 of an inch on each side nor any larger than .643 of an inch on each side;
 - (b) Instead of the name of the gaming licensee, a gaming licensee may, with the approval of the Bureau, have an identifying mark or logo imprinted or impressed on each die; and
 - (c) The spots on each die do not have to be equal in diameter.

(3) Each die used in gaming at mini-dice shall comply with the requirements of 205 CMR 146.45(1) or (2).

146.46: Dice: Receipt, Storage, Inspections, and Removal From Use

(1) When boxes of dice are received for use by the gaming licensee from the manufacturer or distributor thereof, at least two individuals, one of whom shall be from the games department and the other from the security department or accounting department, shall record on an inventory log as required in 205 CMR 146.46(2) the number of dice received. The individuals shall place boxes of dice in a locked cabinet in the cashiers' cage or within a primary or other secure storage area approved by the Bureau. Secure storage areas shall be used for the storage of surplus dice. Dice maintained in secure storage areas shall not be distributed to gaming pits or tables for use in gaming until the dice have been moved to a primary storage area.

(2) The gaming licensee shall maintain a log for each approved storage area to separately account for dice in accordance with an inventory system. The inventory system shall include the following:

(a) A dice inventory system, which shall include, at a minimum, the recordation of the following:

1. Balance of dice on hand and their location;
2. Dice received from the vendor;
3. Dice removed from storage;
4. Dice returned to storage;
5. Date of:
 - a. Receipt from vendor;
 - b. Removal from storage;
 - c. Return to storage; and
 - d. Physical inventory of dice.
6. Signatures of the games department and security and/or accounting department representatives participating in the procedure;
7. A reconciliation, on a daily basis, of the dice distributed, destroyed, and cancelled; returned to the storage area; in use on an open gaming table for more than 24 hours; and in dice reserve, if any; and
8. A physical inventory of the dice at least once every three months. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the balance of dice on hand as required in accordance with 205 CMR 146.46(2). Any discrepancies shall immediately be reported to the Bureau.

(3) All approved storage areas and pit stands used to store dice for more than one gaming day, other than the cashiers' cage, shall have two separate locks. The security department shall maintain one key and the games department or cashiers' cage shall maintain the

other key; provided, however, that no person employed by the games department below the table games shift manager in the organization hierarchy shall have access to the games department key. Dice stored in a cabinet within the cashiers' cage shall be secured by a lock, the key to which shall be maintained by a table games shift manager or games supervisor thereof.

(4) When removing dice from the primary storage area, a representative of the games department, in the presence of a security officer, shall remove the appropriate number of dice. The representative of the games department may be the table games shift manager or a games supervisor thereof, or an employee of the games department who reports directly to the shift manager, but shall in any event be licensed as a key gaming employee and shall have no direct supervisory responsibilities over the operation and conduct of the table games in a pit during that gaming day. This individual shall distribute sufficient dice to the table games supervisor. Dice in the pit stand shall be placed in a locked compartment, the keys to which shall be in the possession of the table games supervisor or supervisor thereof. If dice are stored in the pit stand for more than one gaming day, the pit stand shall be equipped with a second lock, the key to which shall be maintained and controlled by the security department. The security lock on the pit stand shall be used whenever the pit is closed.

(5) All envelopes and containers used in this section for dice pre-inspected at the pit stand or in a primary storage area and for those collected by security shall be transparent. The envelopes or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.

(6) All dice shall be inspected and distributed to the gaming tables in accordance with one of the following applicable alternatives:

(a) Alternative No. 1: Distribution to and inspection at craps, mini-craps, mini-dice, or sic bo tables shall be as follows:

1. The table games shift manager or games supervisor thereof and the security officer who removed the dice from the primary storage area shall distribute sufficient dice directly to the games supervisor in each pit, or place them in a locked compartment in the pit stand, the keys to which shall be in the possession of the games supervisor or a supervisor thereof;
2. Immediately upon opening a table for gaming, the games supervisor shall distribute a set of dice to the table. At the time of receipt, a boxperson at each craps table and the floorperson at each sic bo, mini-dice, mini-craps table, in order to ensure that the dice are in a condition to assure fair play and otherwise conform to M.G.L. c. 23K and 205 CMR 146, shall, in the presence of the dealer, inspect the dice given to him or her with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet, which instruments shall be kept in a compartment at each craps table or pit stand

and shall be at all times readily available for inspection and use by the Bureau;

3. Following the inspection in 205 CMR 146.46(2):

- a. For craps, the boxperson shall, in the presence of the dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table, they shall never be left unattended;
- b. For mini-craps, the floorperson shall, in the presence of the dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table, they shall never be left unattended; and
- c. For sic bo and mini-dice, the floorperson shall, in the presence of the dealer, place the required number of dice into the shaker and seal or lock the shaker. For sic bo, the floorperson shall then secure the sic bo shaker to the table in the presence of the dealer who observed the inspection. For mini-dice, the floorperson shall then give the sealed mini-dice shaker to the dealer, who shall be primarily responsible for the security of the shaker at all times while the shaker is available for use at the table; and
- d. The games supervisor shall place extra dice for dice reserve in the pit stand. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the games supervisor or a supervisor thereof. No dice taken from this reserve shall be used for actual gaming until and unless inspected in accordance with 205 CMR 146.46(2).

(b) Alternative No. 2: Distribution to and inspection at the pit stand shall be as follows:

1. The table games shift manager or supervisor thereof and the security officer who removed the dice from the primary storage area shall distribute the dice directly to the games supervisor identified, who will perform the inspection in each pit.
2. The inspection of the dice at the pit stand shall be performed by:
 - a. For craps and mini-craps, a boxperson or floorperson in the presence of another boxperson or floorperson, both of whom are assigned the responsibility of supervising the operation and conduct of a craps game; and
 - b. For sic bo, mini-dice, pai gow, pai gow poker, supreme pai gow, or asia poker, a floorperson, in the presence of another floorperson, both of whom are assigned the responsibility of supervising the operation and conduct of such games.
3. To ensure that the dice are in a condition to assure fair play and otherwise conform to M.G.L. c. 23K and 205 CMR 146, the dice shall be inspected with a micrometer or any other approved instrument that

performs the same function, a balancing caliper, a steel set square, and a magnet, which instruments shall be kept at the pit stand and shall be at all times readily available for inspection and use by the Bureau. The inspection shall be performed on a flat surface, which allows the dice inspection to be observed through closed circuit television cameras and by any persons in the immediate vicinity of the pit stand.

4. After completion of the inspection, the dice shall be distributed as follows:

- a. For craps and mini-craps, the boxperson or floorperson who inspected the dice shall, in the presence of the other boxperson or floorperson who observed the inspection, distribute such dice to the boxperson assigned at each craps table or to the floorperson assigned at each mini-craps table. The craps boxperson or the mini-craps floorperson shall, in the presence of the dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table they shall never be left unattended;
- b. For sic bo and mini-dice, the floorperson who inspected the dice shall, in the presence of the other floorperson who observed the inspection, place the required number of dice into the shaker and seal or lock the shaker. For sic bo, the floorperson shall then secure the sic bo shaker to the table in the presence of the other floorperson who observed the inspection. For mini-dice, the floorperson shall then give the sealed mini-dice shaker to the dealer, who shall be primarily responsible for the security of the shaker at all times while the shaker is available for use at the table; and
- c. For pai gow, pai gow poker, supreme pai gow, or asia poker, the floorperson who inspected the dice shall, in the presence of the other floorperson who observed the inspection, distribute such dice directly to the dealer at each pai gow, pai gow poker, supreme pai gow, or asia poker table. The dealer shall immediately place the dice in the pai gow, pai gow poker, supreme pai gow, or asia poker shaker.

5. The games supervisor shall place extra sets of dice for dice reserve in the pit stand, as follows:

- a. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the games supervisor or a supervisor thereof.
- b. Except as otherwise provided in 205 CMR 146.46(6), all dice taken from the reserve shall be re-inspected by a games supervisor in the presence of another games supervisor in accordance with the inspection procedures set forth in 205 CMR 146.46(6)(a)2, prior to their use for actual gaming.

c. In accordance with 205 CMR 146.46(6), previously inspected reserve dice may be used for gaming without being reinspected, if they are maintained in a locked compartment in the pit stand, the key for which shall be in the possession of the games supervisor or games supervisor thereof.

d. In accordance with 205 CMR 146.46(6) and as an additional alternative to 205 CMR 146.46(6)(a)-(b), previously inspected reserve dice may be used for gaming without being reinspected, if they are maintained in a locked compartment in the pit stand in accordance with the following procedures:

i. For craps and mini-craps, a set of at least five dice, after being inspected, shall be placed in a sealed envelope or container. A label that identifies the date of inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container.

ii. For sic bo and mini-dice, the required number of dice, after being inspected, shall be placed in a sealed envelope or container or sealed or locked in a sic bo or mini-dice shaker. A label or seal that identifies the date of inspection and contains the signatures of those responsible for the inspection shall, respectively, be attached to each envelope or container or placed over the area that allows access to open the sic bo or mini-dice shaker.

iii. For pai gow, pai gow poker, supreme pai gow, and asia poker, a set of three dice, after being inspected, shall be placed in a sealed envelope or container. A label that identifies the date of inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container.

(c) Alternative No. 3: Inspection in primary storage area and distribution to tables shall be as follows:

1. Inspection of dice for all table games in an approved primary storage area shall be performed by a games supervisor and a table games shift manager, in the presence of a security officer.

2. The dice shall be inspected with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet to ensure that the dice are in a condition to assure fair play and otherwise conform to M.G.L. c. 23K and 205 CMR. These instruments shall be maintained in the storage area and shall be at all times readily available for inspection and use by the Bureau.

3. After completion of the inspection, the person performing the inspection shall seal the dice as follows:

a. For craps and mini-craps, after each set of at least five dice are inspected, they shall be placed in a sealed envelope or container;

- provided, however, that reserve dice may be placed in individual sealed envelopes or containers. A label that identifies the date of the inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container;
- b. For sic bo and mini-dice, after each set of dice are inspected, they shall be sealed or locked in a manual shaker. A seal that identifies the date of the inspection and contains the signatures of those responsible for the inspection shall then be placed over the area that allows access to open the shaker;
 - c. For pai gow, pai gow poker, supreme pai gow, or asia poker, after each set of three dice are inspected, they shall be placed in a sealed envelope or container. A label that identifies the date of the inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container; and
4. At the beginning of each gaming day and at such other times as may be necessary, a table games shift manager or games supervisor thereof and a security officer shall distribute the dice as follows:
- a. For craps and mini-craps, the sealed envelopes or containers of dice shall be distributed to a games supervisor in each craps or mini-craps pit or placed in a locked compartment in the pit stand by the games supervisor. When the sealed dice are distributed to the craps or mini-craps table, a boxperson at each craps table or a floorperson at each mini-craps table, after assuring the seals are intact and free from tampering, shall open the sealed envelope or container, in the presence of the dealer, and place the dice in a cup on the table for use in gaming. While dice are on the table, they shall never be left unattended.
 - b. For sic bo and mini-dice, the sealed manual shakers shall be distributed to the games supervisor supervising the game. For sic bo, the games supervisor shall then secure the manual sic bo shaker to the table. For mini-dice, the games supervisor shall give the sealed mini-dice shaker to the dealer who shall be primarily responsible for the security of the shaker at all times while the shaker is available for use at the table.
 - c. For pai gow, pai gow poker, supreme pai gow, or asia poker, the sealed envelope or container shall be distributed to a games supervisor in each pai gow, pai gow poker, supreme pai gow, or asia poker pit or placed in a locked compartment in the pit stand. When the sealed dice are distributed to the pai gow, pai gow poker, supreme pai gow, or asia poker table by the games supervisor, a floorperson, after assuring the seal and envelopes or containers are intact and free from tampering, shall open the sealed envelope or container, in the presence of the dealer, and place the dice in the pai gow, pai gow poker, supreme pai gow, or asia poker shaker.

d. When the envelope or container or the seal is damaged, broken, or shows indication of tampering, the dice shall not be used for gaming activity unless the dice are re-inspected as follows:

i. For craps, mini-craps, mini-dice, and sic bo, in accordance with the procedures in 205 CMR

146.46(6)(a)(2); and

ii. For pai gow, pai gow poker, supreme pai gow, or asia poker, in accordance with the procedures in 205 CMR 146.46(6)(a)(2).

e. The games supervisor shall place extra dice for dice reserve in the pit stand. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the games supervisor or supervisor thereof.

f. A micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet shall also be maintained in a locked compartment in each pit stand, and each such instrument shall be at all times readily available for inspection and use by the Bureau.

g. Any primary storage area in which dice are inspected in accordance with this section, shall be equipped with closed circuit television camera coverage capable of observing the entire inspection procedure.

5. The gaming licensee shall remove any dice at any time of the gaming day if there is any indication of tampering, flaws, or other defects that might affect the integrity or fairness of the game or at the request of the Bureau.

6. At the end of each gaming day or at such other times as may be necessary, the games supervisor shall visually inspect each die for evidence of tampering. Such evidence discovered at this time or at any other time shall be immediately reported to the security department and the Bureau. A security department member shall complete a two-part Discrepancy Report (Report) comprised of an original and duplicate, which along with the evidence, shall be retrieved by an agent of Bureau. The original and duplicate shall contain at a minimum:

a. Date and shift of inspection;

b. Name of games supervisor conducting the inspection. The inspection required by this subsection shall be performed by a games supervisor other than the one who originally inspected the dice;

c. Pit number, table number, and type of game;

d. Description (for example, shaved corners);

e. Signature of games supervisor conducting the inspection;

f. Signature of security representative taking custody of the die; and

g. The signature of the agent of the Bureau inspecting or accepting the die. The Bureau agent shall retain the original and return the duplicate to the security department. A receipt shall be issued to the agent of the Bureau for any die retained by the Bureau. The receipt shall be signed by the security representative releasing the die to the Bureau and the agent of the Bureau accepting the die. The receipt shall be retained with the security department copy of the Report. Any die not retained by the Bureau shall be destroyed in accordance with the licensee's destruction procedures.

7. Any dice showing evidence of tampering shall be placed in a sealed envelope or container. A label shall be attached to each envelope or container, which shall identify the table number, date, and time and shall be signed by a person assigned to directly operate and conduct the game at that table and a games supervisor assigned the responsibility for supervising the operation and conduct of such game. The security officer taking custody of the dice and delivering the dice to the Bureau shall also sign the label.

8. All other dice not showing evidence of tampering shall be put into envelopes or containers at this time. A label shall be attached to each envelope or container which shall identify the table number, date, and time and shall be signed by the appropriate persons identified in 205 CMR 146.46(4). The envelope or container shall be appropriately sealed and maintained within the pit until collection by a security officer.

9. All extra dice in dice reserve that are to be destroyed or cancelled shall be placed in a sealed envelope or container, with a label attached to each envelope or container that identifies the date and time and is signed by the games supervisor.

10. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, and at such other times as may be necessary, a security officer shall collect and sign all envelopes or containers of used dice and any dice in dice reserve that are to be destroyed or cancelled and shall transport them to the security department for cancellation or destruction. No dice that have been placed in a cup or shaker for use in gaming shall remain on a table for more than 24 hours.

11. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee and, and at such other times as may be necessary, a table games shift manager or games supervisor thereof may collect all extra dice in dice reserve. If collected, dice shall be returned to the primary storage area; provided, however, that any dice that have not been inspected and sealed pursuant to the requirements in 205 CMR 146.46(6)(c) shall, prior to use for actual gaming, be inspected as follows:

- a. For craps, mini-craps, mini-dice, or sic bo, in accordance with the requirements in 205 CMR 146.46(6)(b)(4)(b); and
- b. For pai gow, pai gow poker, supreme pai gow, or asia poker, in accordance with the requirements in 205 CMR 146.46(6). If not collected, all dice in dice reserve must be reinspected prior to their use for gaming, except for those dice maintained in a locked compartment.

12. Other than dice retained for Bureau inspection, dice shall be cancelled or destroyed within 72 hours of collection by the security department. In addition, once dice retained as evidence by the Bureau are released to the security department, the dice shall immediately be destroyed or cancelled. Destruction and cancellation of dice shall take place in a secure place, the location and physical characteristics of which shall be approved by the Bureau. The adequacy of the destruction and cancellation process shall be approved by the Bureau. Destruction of dice shall be by shredding by the security department or a vendor approved by the Bureau. Cancellation of dice by the security department shall be by drilling a circular hole of at least one fourth of an inch in diameter through the center of each die.

146.47: Manual and Automated Dice Shakers: Security Procedures

(1) Manual sic bo shakers and mini-dice shakers which have been filled with dice in accordance with 205 CMR 146.46 may only be stored in a locked compartment in the primary storage area. Manual sic bo shakers and mini-dice shakers which have not been filled with dice may be stored in a locked compartment in the pit stand. An automated dice shaker which has been filled with dice must be secured to the gaming table at all times. An automated dice shaker which has not been filled with dice may be stored in a locked compartment in the pit stand.

(2) At the end of each gaming day a pit manager shall inspect all sic bo shakers, mini-dice shakers and automated dice shakers that have been placed in use for gaming for evidence of tampering. Such evidence discovered at this time shall be immediately reported to the Bureau. At a minimum, such reports shall include:

- (a) The date and time when the tampering was discovered;
- (b) The table number where the shaker was used; and
- (c) The name and license number of the individual discovering the tampering.

146.48: Cards: Physical Characteristics

(1) Cards used to play authorized table games shall be in decks of 52 cards, except as otherwise authorized by 205 CMR 146.48(8), with each card identical in size and shape to every other card in such deck.

(2) Each deck shall be composed of four suits: diamonds, spades, clubs and hearts, or as otherwise authorized by 205 CMR 146.48(8).

(3) Each suit shall be composed of 13 cards: ace, king, queen, jack, 10, nine, eight, seven, six, five, four, three, and two. The face of the ace, king, queen, jack, and 10 value cards may contain an additional marking, which will permit a dealer, prior to exposing his or her hole card at the game of blackjack, to determine the value of that hole card.

(4) The backs of each card in the deck shall be identical and no card shall contain any marking, symbol or design that will enable a person to know the identity of any element printed on the face of the card or that will in any way differentiate the back of that card from any other card in the deck.

(5) The backs of all cards in the deck shall be designed so as to diminish as far as possible the ability of any person to place concealed markings thereon.

(6) The design to be placed on the backs of cards used by gaming licensees shall contain the name or trade name of the gaming licensee and shall be submitted to the Bureau prior to use of such cards in gaming activity.

(7) Each deck of cards shall be packaged separately or in a set containing the number of decks authorized by 205 CMR 146.48 and selected by a gaming licensee for use in a particular table game. Each package of cards shall be sealed in a manner so as to provide evidence of any tampering with the package. If multiple decks of cards are packaged and sealed in a set:

- (a) The package shall have a label affixed thereto that indicates or contain a window that reveals an adequate description of the contents of the package, including without limitation, the name of the gaming licensee for which the cards were manufactured, the type of cards, the color(s) of the backs of the cards, the date and time that the cards were manufactured, and the total number of cards in the set; and
- (b) No deck of cards shall be separated from the set for independent use at a table game.

(8) Nothing in this section shall prohibit a manufacturer from manufacturing decks of cards with one or more jokers contained therein; provided, however, such jokers shall not be used by the gaming licensee in the play of any game other than pai gow poker, two-card joker poker, Asia poker or supreme pai gow in accordance with the provisions of the authorized Rules of the Game of Pai Gow Poker, Two Card Joker Poker, Asia Poker, and Supreme Pai Gow.

(9) In addition to satisfying the requirements of this section, the cards used by a gaming licensee at poker must:

- a. Be visually distinguishable from the cards used by that gaming licensee to play any other table game; and
- b. Be made of plastic.

10. Each gaming licensee which elects to offer the game of poker shall be required to have and use on a daily basis at least four visually distinguishable card backings for the cards to be used at the game of poker. These card backings may be distinguished, without limitation, by different logos, different colors or different design patterns.

146.49: Cards: Receipt, Storage, Inspections, and Removal From Use

(1) When decks of cards are received for use in the gaming establishment from the manufacturer or distributor thereof, at least two individuals, one of whom shall be from the casino games department and the other from the security department or accounting department, shall record on an inventory log required in 205 CMR 146.46(2), the number of decks received. The individuals shall place the decks of cards in a locked cabinet in the cashiers' cage or within a primary or secondary storage area located in the cashiers' cage or in another secure place approved by the Bureau. Secondary storage areas shall be used for the storage of surplus decks of cards. Decks of cards maintained in secondary storage areas shall not be distributed to gaming pits or tables for use in gaming until the decks have been moved to a primary storage area. A gaming licensee may have a separate storage area approved by the Bureau for decks of cards to be used at the game of poker.

(2) The gaming licensee shall maintain an inventory log (manual or electronic) for each approved storage area, to separately account for decks of cards packaged individually and in sets of multiple decks in accordance with the gaming licensee's card inventory system, which shall include the recordation of the following:

- (a) The decks of cards received from the vendor;
- (b) The decks of cards removed from storage;
- (c) The decks of cards returned to storage;
- (d) The date of receipt of, removal from, return to, or physical inventory;
- (e) The signatures of the games, security and/or accounting department personnel participating in the procedure;
- (f) A reconciliation on a daily basis of the decks of cards distributed, destroyed and cancelled, returned to the storage area, in use on an open gaming table for more than 24 hours and, if any, in card reserve; and
- (g) A physical inventory of the decks of cards at least once every three months. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the balance of decks of cards on hand as required in accordance with 205 CMR 149(1).
- (h) Any discrepancies shall immediately be reported to the Bureau.

(3) All primary, secondary, poker storage areas, and pit stands used to store cards for more than one gaming day, other than the cashiers' cage, shall have two separate locks. The security department shall maintain one key and the games department or cashiers' cage shall maintain the other key; provided, however, that no person employed by the games department below the table games shift manager in the organizational hierarchy shall have access to the games department key for the primary and secondary storage areas and no person below the poker shift supervisor in the organizational hierarchy shall have access to the games department key to the poker storage area. Decks of cards stored in a cabinet within the cashiers' cage shall be secured by a lock, the key to which shall be maintained by a table games shift manager or supervisor thereof.

(4) When removing cards from the primary storage area, a representative of the games department, in the presence of a security officer, shall remove the appropriate number of decks of cards. The representative of the games department may be the table games shift manager or a supervisor thereof, or an employee of the games department who reports directly to the shift manager, and shall be licensed as a gaming key employee and shall have no direct supervisory responsibilities over the operation and conduct of the table games in a pit during that gaming day. This individual shall distribute sufficient decks to the table games supervisor and, if applicable, to the poker shift supervisor. Decks of cards in the pit stand shall be placed in a locked compartment, the keys to which shall be in the possession of the table games supervisor or the poker shift supervisor or supervisor thereof. If decks of cards are stored in the pit stand for more than one gaming day, the pit stand shall be equipped with a second lock, the key to which shall be maintained and controlled by the security department.

- (a) If the decks are to be inspected at open gaming tables pursuant to 205 CMR 149(6), the table games supervisor shall distribute the decks to the dealer at each table or the poker shift supervisor shall transport the decks to the poker pit stand for subsequent distribution to the dealer at each poker table either directly or through the floorperson assigned to supervise the dealer.
 - (i) Prior to distributing decks to each poker table, the poker shift supervisor or floorperson shall examine each deck to determine if any replacement cards are necessary pursuant to 205 CMR 149(6). If needed, the poker shift supervisor or floorperson shall place the appropriate replacement cards into the deck from the cards held in reserve at the pit stand. Upon insertion of the replacement cards into the deck, the poker shift supervisor or floorperson shall re-examine the front of each card and the back of each card to ensure a consistent shading pattern and to ensure that the condition of the deck with the inclusion of the replacement cards has sufficient quality in order to maintain the integrity of gaming at poker.
 - (ii) If the integrity of gaming at poker would in any way be compromised by the use of the deck with the replacement cards, the entire deck of cards shall be placed in a sealed envelope or container, identified with the date and time and

shall be signed by the poker shift supervisor. The poker shift supervisor shall maintain the envelope or container in a secure place within the pit stand until collection by a security officer.

(5) When removing cards from the poker storage area, the poker shift supervisor or supervisor thereof and a casino security officer shall, prior to the commencement of each gaming day and at such other times as may be necessary, remove the appropriate number of decks from the poker storage area and distribute the decks in accordance with the provisions of 205 CMR 146.49(4)(a). The number of decks distributed shall include extra decks that shall be placed in the pit stand for card reserve. Decks of cards in the pit stand shall be placed in a locked compartment, the keys to which shall be in the possession of the poker shift supervisor or supervisor thereof. If decks of cards are stored in the pit stand for more than one gaming day, the pit stand shall be equipped with a second lock, the key to which shall be maintained and controlled by the security department.

(6) With the exception of cards which are pre-inspected and pre-shuffled, each deck of cards shall be inspected by a dealer and the inspection verified by a table games supervisor prior to the use of the cards on a gaming table.

(a) Card inspection at an open gaming table shall require each deck of cards to be sorted into sequence and into suit and a visual inspection of the back of each card. If, after inspecting the cards, the dealer finds that a card is unsuitable for use or an extra card is found, the following procedures shall be observed:

(i) If a card is unsuitable for use:

1. A poker shift supervisor or games supervisor shall bring a substitute card from the card reserve in the pit stand;
2. The unsuitable card shall be placed in a sealed envelope or container, identified by table number, date, and time and shall be signed by the dealer and floorperson assigned to that table; and
3. The poker shift supervisor or games supervisor shall maintain the envelope or container in a secure place within the pit until collection by a casino security officer; or

(ii) If an extra card is found:

1. The poker shift supervisor or games supervisor shall place the extra card in a sealed envelope or container, identified by table number, date and time and signed by the dealer and floorperson assigned to that table; and
2. The poker shift supervisor or games supervisor shall maintain the envelope or container in a secure place within the pit until collection by a casino security officer.

(b) The envelopes or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.

(7) Any cards which have been opened and placed on a gaming table shall be changed at least every 24 hours. Notwithstanding the foregoing:

- (a) Except as otherwise provided in 205 CMR 146.49(7)(e) for baccarat and in 146.18(c) for mini-baccarat, cards opened for use on a baccarat, mini-baccarat, or fast action hold 'em table shall be changed at least once during the gaming day;
- (b) Cards opened for use on a pai gow poker, Caribbean stud poker, let it ride poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, two-card joker poker, flop poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud or three-card poker table and dealt from a dealing shoe and cards opened for use on a double down stud table and dealt from the hand shall be changed at least every eight hours;
- (c) Cards opened for use on a pai gow poker, Caribbean stud poker, let it ride poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, flop poker, two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud or three-card poker table and dealt from the dealer's hand shall be changed at least every four hours;
- (d) Cards opened for use on a blackjack table offering the 6 to 5 blackjack variation shall be changed at least every four hours;
- (e) Cards opened for use on a baccarat table using the alternative dealing procedure shall be changed after each shoe;
- (f) Cards opened for use on a poker table shall be changed at least every six hours; and
- (g) Cards opened for use on a blackjack, Spanish 21 or double attack blackjack table, or on a mini-baccarat table using the alternative dealing procedures of a continuous shuffling shoe or device as set forth in ~~Section 14 of~~ the Authorized Rules of the Game ~~for of~~ Mini-Baccarat, may be used for no more than 48 hours if the following requirements are satisfied:

- 1. The gaming table shall remain open for gaming during the entire period of card usage;
- 2. At least six decks of cards shall be used to play the game; and
- 3. A table games shift manager shall identify for the surveillance department those gaming tables at which cards are in use for the extended period.

(8) Cards damaged during course of play shall be replaced by the dealer who shall request a floorperson or supervisor thereof for the game of poker or casino supervisor for all other games to bring cards in substitution from the pit stand.

- (a) The damaged cards shall be placed in a sealed envelope, identified by table number, date and time and shall be signed by the dealer and the individual who brought the replacement card to the table.

- (b) The poker shift supervisor or casino supervisor shall maintain the envelopes or containers in a secure place within the pit until collection by a casino security officer.
- (9) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, or at the end of the extended period pursuant to 205 CMR 146.49(7)(g), and at such other times as may be necessary, the floorperson or supervisor thereof for the game of poker or casino supervisor for all other games shall collect all used cards required to be removed from play.
- (a) These cards shall be placed in a sealed envelope or container. A label shall be attached to each envelope or container which shall identify the table number, date and time and shall be signed by the dealer and floorperson assigned to the table.
 - (b) The poker shift supervisor or casino supervisor shall maintain the envelopes or containers in a secure place within the pit until collection by a casino security officer.
- (10) The gaming licensee shall remove any cards at any time during the day if there is any indication of tampering, flaws, scratches, marks or other defects that might affect the integrity or fairness of the game, or at the request of the Bureau.
- (11) Except for decks that have been pre-shuffled and pre-inspected in accordance with 205 CMR 146.50, all extra decks or packaged sets of multiple decks in card reserve with broken seals shall be placed in a sealed envelope or container, with a label attached to each envelope or container that contains the number of decks or packaged sets of multiple decks, as applicable, included therein, the date and time and the signature of the floorperson or supervisor thereof for poker and the pit boss for all other games.
- (12) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, and at such other times as may be necessary, a security officer shall collect and sign all envelopes or containers with damaged cards, cards required to be removed that gaming day, and all extra decks in card reserve with broken seals, except those that have been pre-shuffled and pre-inspected in accordance with 205 CMR 146.50, and shall return the envelopes or containers to the security department.
- (13) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, and at such other times as may be necessary, a table games shift manager or games supervisor thereof may collect all extra decks in card reserve. If the gaming licensee maintains a separate storage area for poker cards, a poker shift supervisor or supervisor thereof may collect all extra decks in card reserve for the game of poker. If collected, all sealed decks shall either be cancelled or destroyed or returned to the storage area.

(14) When the envelopes or containers of used cards and reserve cards with broken seals are returned to the casino security department, they shall be inspected for tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play.

- (a) For cards used in blackjack, Spanish 21, double attack blackjack, double cross poker, red dog, casino war, fast action hold 'em, or mini-baccarat using the dealing procedures in the authorized Rules of the Game, the gaming licensee shall cause to be inspected either:
 - (i) All decks used during the day; or
 - (ii) A sample of decks selected at random or in accordance with an approved stratification plan, provided that the procedures for selecting the sample size and for assuring a proper selection of the sample are submitted to and approved by the Bureau. This sample shall be collected, stored and inspected separately from the sample required by 205 CMR 146.49(14)(b), and shall not be commingled with any cards from that sample.
- (b) For cards used in baccarat, or cards used in mini-baccarat using the dealing procedures in the authorized Rules of the Game, the gaming licensee shall cause to be inspected all decks used during the day. Notwithstanding the foregoing, for any decks that are opened for a single use in a shoe (the cards are not reshuffled for a subsequent use and are removed from the table), a gaming licensee may cause to be inspected a sample of decks selected at random or in accordance with an approved stratification plan, provided that the procedures for selecting the sample size and for assuring a proper selection of the sample are submitted to and approved by the Bureau.
- (c) The gaming licensee shall also inspect:
 - (i) Any cards which the Bureau requests the gaming licensee to remove for the purpose of inspection;
 - (ii) Any cards the gaming licensee removed for indication of tampering;
 - (iii) All cards used for pai gow poker, Caribbean stud poker, let it ride poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, flop poker, two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud or three-card poker; and
 - (iv) All cards used for poker.
- (d) The procedures for inspecting all decks required to be inspected under this subsection, shall, at a minimum, include:
 - (i) The sorting of cards sequentially by suit or utilizing a machine approved by the Bureau capable of reading the cards to determine whether any deck contains missing or additional cards;
 - (ii) The inspection of the backs with an ultra- violet light;

- (iii) The inspection of the sides of the cards for crimps, bends, cuts and shaving;
and
 - (iv) The inspection of the front and back of all plastic cards for consistent shading and coloring.
- (e) If, during the inspection procedures required in 205 CMR 146.49 one or more plastic cards in a deck are determined to be unsuitable for continued use, those cards shall be placed in a sealed envelope or container and a two-part Card Discrepancy Report shall be completed in accordance with 205 CMR 146.49(14)(j).
- (f) Upon completion of the inspection procedures required by 205 CMR 146.49, each deck of plastic cards which is determined suitable for continued use shall be placed in sequential order, repackaged and returned to the primary or poker storage area for subsequent use. If a deck has any missing cards, the individual who repackages the cards shall indicate the need for the appropriate replacement card(s) in a manner documented in the gaming licensee's internal control procedures.
- (g) The gaming licensee shall develop internal control procedures for returning the repackaged cards to the storage area.
- (h) The individuals performing said inspection shall complete a work order form which shall detail the procedures performed and list the tables from which the cards were removed and the results of the inspection. The individual shall sign the form upon completion of the inspection procedures.
- (i) The gaming licensee shall submit the training procedures for those employees performing the inspection to the Bureau.
- (j) Evidence of tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play discovered at this time, or at any other time, shall be immediately reported to the Bureau by the completion and delivery of a two-part Card Discrepancy Report.
- (k) At the end of each gaming day or at such other times as may be necessary, the gaming supervisor identified in 205 CMR 146.49(13) shall visually inspect each card for evidence of tampering. Such evidence discovered at this time or at any other time shall be immediately reported to the security department and the Bureau. A security department member shall complete a two-part Discrepancy Report, which Report along with the evidence shall be retrieved by an agent of the Bureau. The original and duplicate Report shall contain, at a minimum:
- (i) The date and shift of inspection;

- (ii) The name of the supervisor conducting the inspection. The inspection required by this subsection shall be performed by a games supervisor other than the one who originally inspected the cards;
- (iii) The pit number, table number, and type of game;
- (iv) A description (for example, cut corners);
- (v) The signature of the supervisor conducting the inspection;
- (vi) The signature of the security representative taking custody of the card; and
- (vii) The signature of the agent of the Bureau inspecting or accepting the card, who shall retain the original and return the duplicate to security. A receipt shall be issued to the agent of the Bureau for any card retained by the Bureau. The receipt shall be signed by the security representative releasing the card to the Bureau and the agent of the Bureau accepting the card. The receipt shall be retained with the Security copy of the Discrepancy Report. Any card not retained by the Bureau shall be destroyed in accordance with the licensee's destruction procedures. The report shall accompany the cards.

- (l) Notwithstanding any provision in this subsection to the contrary, for cards used:
 - (a) In any authorized game or variation thereof which permits a player to touch them, the gaming licensee shall cause to be inspected all decks used during the day; and
 - (b) At any gaming table for more than 24 hours pursuant to 205 CMR 146.49(7)(g), the gaming licensee shall cause to be inspected a sample of decks that is separate from the sample of decks selected pursuant to 205 CMR 146.49(14)(a)(ii), provided that the procedures for selecting the sample size and for assuring a proper stratification of the sample shall be submitted to and approved by the Bureau.

(15) If a deck of plastic cards has been reused 12 or more times and the deck has been determined to be suitable for reuse by the individual performing the inspection procedures required by 205 CMR 146.49(14)(c), before that deck may be reused at a poker table, the deck must be inspected by a poker shift supervisor or floorperson. A satisfactory inspection shall be documented by the poker shift supervisor or floorperson. If the poker shift supervisor or floorperson determines that the deck may not be reused, the deck shall be placed in a sealed envelope or container, with a label attached which identifies the date and time and shall be signed by the poker shift supervisor or floorperson. At the end of the gaming day or at such other times as may be necessary, said envelope or container shall be collected by a casino security officer and be returned to the casino security department for destruction or cancellation pursuant to 205 CMR 146.49(16)

(16) Where cards in an envelope or container are inspected and found to be without any indication of tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play, those cards with the exception of plastic cards used at poker

that are of sufficient quality for reuse, shall within 72 hours of collection be destroyed or cancelled. In addition, once cards retained as evidence by the Bureau are released to the security department, the cards shall immediately be destroyed or cancelled.

- (a) Destruction and cancellation of cards shall take place in a secure place, the location and physical characteristics of which shall be approved by the Bureau. The adequacy of the destruction and cancellation process shall be approved by the Bureau.
- (b) Destruction of cards shall be by shredding by the security department or a vendor approved by the Bureau.
- (c) Cancellation of cards shall be by drilling a circular hole of at least one-fourth of an inch in diameter through the center of each card in the deck.
- (d) Documentation supporting the actual destruction and/or cancellation of the cards shall be prepared by the casino security department or vendor performing the process. At a minimum, such documentation shall include:
 - (i) The date and time that the cards were destroyed;
 - (ii) The name and signature of the individual(s) who performed the destruction/cancellation process;
 - (iii) The amount of cards that were destroyed or cancelled; and
 - (iv) The signature of the representative of the games department attesting to the number of cards (decks of cards) destroyed when the procedure is performed at the casino.

146.50: Pre-shuffled and Pre-inspected Cards

- (1) In lieu of the card shuffling and inspection procedures to be followed at an open gaming table set forth in 205 CMR 146.50, a gaming licensee may elect to:
 - (a) Pre-inspect and pre-shuffle cards prior to the delivery of the cards to an open gaming table; or
 - (b) Use a licensed vendor to supply pre-shuffled and pre-inspected cards.
- (2) If a gaming licensee elects to pre-inspect and pre-shuffle cards, the process shall occur at a closed gaming table or another location approved by the Bureau and shall be performed by a dealer and verified by a gaming establishment supervisor with no concurrent supervisory responsibility for open gaming tables. The procedures required by 205 CMR 146.50(2)(a)-(g) shall be recorded by the surveillance department and each such recording shall be retained by the gaming licensee for not less than seven days.
 - (a) Upon receipt of the decks of cards pursuant to 205 CMR 146.50(3)(b), the dealer shall perform the procedures in 205 CMR 146.50(2)(b)-(g) independently for each batch of cards that will be sealed in a container, with the number of decks of cards in each batch being equal to the number of decks of cards required for the table game in which they are intended to be used.

(b) The dealer shall visually inspect the back of each card to assure that it is not flawed, scratched or marked in any way that might compromise the integrity or fairness of the game.

(c) The dealer shall then shuffle the cards, manually or using an approved automated shuffling device, in a manner permitted by the applicable regulations governing the table game at which the cards will be utilized.

(d) To ensure that there are no missing or extra cards, the dealer shall inspect the cards utilizing a machine approved by the Bureau. The machine shall issue a receipt that shall, at a minimum, include:

1. The manufacturer, model and serial number of the card inspection machine;
2. The name or identification number of the dealer who operates the machine;
3. The location at which the inspection is performed;
4. The date and time of the inspection;
5. The manufacturer and type of cards, the number of decks, and the table game for which the cards are inspected;
6. The result of the inspection and, if failed, the identification of any missing or extra card(s); and
7. The number of the seal to be used on the clear container in which the cards will be placed pursuant to 205 CMR 146.50(2)(g).

(e) If the inspection fails, the gaming licensee shall follow the procedures set forth in 205 CMR 146.49(6).

(f) Upon completion of the pre-inspection and pre-shuffling of the cards in the batch, the dealer and supervisor shall sign the receipt certifying that the cards were pre-inspected and pre-shuffled in accordance with this subsection.

(g) For each batch of pre-inspected and pre-shuffled cards the dealer shall place the cards together with the receipt required 205 CMR 146.50(2)(d) in a clear container that conforms to the requirements of 205 CMR 146.50(5). The container shall be sealed with a pre-numbered label unique to such container. Procedures for the maintenance and security of unused seals, and the distribution, return and reconciliation of seals used on containers holding pre-inspected and pre-shuffled cards shall be detailed in the gaming licensee's internal controls.

(h) The sealed containers of cards shall be transported by a:

1. Table games supervisor to the gaming pit of the gaming tables where they will be utilized and either locked in the pit stand in accordance with 205 CMR 146.50(3) or (4), or placed in a locked cabinet in the gaming pit, the keys to which shall be available only to table games supervisors and subject to sign-out and sign-in procedures; or
2. Table games supervisor or a gaming key employee designated in accordance with the provisions of 205 CMR 146.50(3) and a casino security officer to an approved primary card storage area or poker card storage area where they shall be placed back into card inventory and

segregated from cards that have not been pre-inspected and pre-shuffled. A record of the transport of the sealed containers of cards to the card storage area shall be maintained by the casino security department.

(i) When cards are needed for play, each container of cards shall be delivered by a table games supervisor to an open gaming table. Upon delivery, the table games supervisor shall unseal the container, place the decks of cards on the gaming table in front of the dealer. The supervisor shall record on the receipt contained within the container, the date, time and shift that the container was opened, and the pit and table number where cards are to be used. Once the information has been recorded, the supervisor shall sign the receipt, and retain the receipt and container at the gaming table.

(3) If a gaming licensee elects to use a licensed vendor to supply pre-inspected and pre-shuffled cards, the manufacturer shall:

(a) Obtain approval from the Bureau for the automated shuffling device used to pre-shuffle cards; and

(b) Implement a process for shuffling and packaging cards which shall, at a minimum, include:

1. Visual inspection of the back of each card to assure that it is not flawed, scratched or marked in any way that might compromise the integrity or fairness of the game;

2. Verification that each package of cards contains the correct number and is constituted in accordance with the specific rules of the game the cards are intended for use;

3. Inserting the cards in a package with a tamper-proof seal(s) that bears a conspicuous indication if the package has been opened. The exterior of the package shall indicate:

a. The total number of decks contained within the package; and

b. The game(s) the cards are intended for use; and

c. Generation by the automated shuffling device in use, of a receipt to be inserted in the sealed package which shall include the following information:

(i) The total number of cards and decks contained within the package;

(ii) The date and time the cards were shuffled and verified;

(iii) Identification of the manufacturer's employee who performed the process in 205 CMR 146.50(3)(b); and

(iv) The manufacturer, model and serial number of the device used to shuffle the cards.

(4) Cards inspected and shuffled in accordance with 205 CMR 146.50(3) shall be delivered to an open gaming table in the manufacturer's sealed packaging. Prior to using the cards at a gaming table, a games supervisor shall inspect the package for evidence of

tampering. If there is evidence of tampering, all cards in the package shall not be used and the gaming licensee shall follow the procedures set forth in 205 CMR 146.49(6). Upon opening the package, the table games supervisor shall record on the receipt contained within the package, the date and time that the package was opened, and the pit and table number where cards are to be used. Once the information has been recorded, the table games supervisor shall sign the receipt, place the cards on the table in front of the dealer, and retain the receipt and original package at the gaming table.

(5) For all pre-inspected and pre-shuffled cards, upon the initial use and patron request the dealer shall perform a strip or riffle shuffle of the cards and then cut the cards in the manner prescribed by the regulations governing the particular table game.

(6) Upon removal from a gaming table, pre-inspected and pre-shuffled cards shall be placed in the original container or package in which they were delivered to the table together with the receipt, and returned to the security department for inspection as required by 205 CMR 146.49(16).

(7) The Bureau may, at any time, require a gaming licensee to provide any container or package of pre-inspected and pre-shuffled cards.

146.51: Dealing Shoes; Automated Shuffling Devices

(1) A gaming licensee and gaming device vendor shall comply with, and the commission adopts and incorporates by reference *Gaming Laboratories International, LLC Standard GLI-29: Card Shufflers and Dealer Shoes*, version 1.0, released July 20, 2012, subject to the following amendments:

- (a) Delete section 1.1.1 and replace with the following: "The following sets forth the technical standards for card shufflers and dealer shoes as identified in 205 CMR 146. This GLI standard is adopted in whole subject to the modifications described in 205 CMR 146.51. The standard and modifications should at all times be read in conjunction with 205 CMR and the standards referenced in section 1.4.1 so as to create a harmonious regulatory framework.
- (b) Delete section 1.2.

(2) The following words and terms, when used in this section, shall have the following meanings:

"Base plate" means the interior shelf of the dealing shoe on which the cards rest.

"Face plate" means the front wall of the dealing shoe against which the next card to be dealt rests and which typically contains a cutout.

(3) Cards used for blackjack, Spanish 21, double attack blackjack, pai gow poker, mini-baccarat, red dog, Caribbean stud poker, let it ride poker, three-card poker, fast action hold 'em, Colorado hold 'em poker, casino war, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, flop poker,

two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud and double down stud shall be dealt from a manual or automated dealing shoe which shall be secured to the gaming table when the table is open for gaming activity and secured in a locked compartment when the table is not open for gaming activity. Cards used to game at baccarat shall be dealt from a dealing shoe which shall be secured in a locked compartment when the table is not open for gaming activity. Notwithstanding the foregoing, cards used to game at:

- (a) Pai gow poker, double down stud, Caribbean stud poker, three-card poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, flop poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud and two-card joker poker may be dealt from the dealer's hand in accordance with the rules for each game authorized pursuant to 205 CMR 147;
- (b) The 6 to 5 blackjack variation shall be dealt from the dealer's hand in accordance with the Authorized Rules of the Game ~~for of~~ Blackjack; and
- (c) Blackjack may be dealt from the dealer's hand in accordance with the Authorized Rules of the Game ~~for of~~ Blackjack.

(4) A device which automatically shuffles cards may be utilized at the game of blackjack, Spanish 21, double attack blackjack, pai gow poker, mini-baccarat, red dog, poker, Caribbean stud poker, let it ride poker, three-card poker, fast action hold'em, Colorado hold 'em poker, casino war, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, flop poker, two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud and double down stud in addition to a manual or automated dealing shoe, provided that:

- (a) The automated card shuffling device approved by the Bureau and the procedures for shuffling and dealing the cards through the use of the device are documented in the internal controls; and
- (b) The security of an automated card shuffling device conforms to the security of any dealing shoe used at the gaming table pursuant 205 CMR 146.51.

(5) Each manual or automated dealing shoe shall be designed and constructed with such features as the Bureau may require maintaining the integrity of the game at which such shoe is used. Such features shall include, at a minimum, the following:

- (a) At least the first four inches of the base plate shall be white;
- (b) The sides of the shoe below the base plate shall be transparent or have a transparent sealed cutout unless the dealing shoe is otherwise constructed to prevent any object from being placed into or removed from the portion of the dealing shoe below the base plate and to permit the inspection of this portion of the shoe; and
- (c) A stop underneath the top of the face plate shall preclude the next card to be dealt from being moved upwards for more than one-eighth inch distance.

(6) A baccarat dealing shoe, in addition to meeting the requirements of 205 CMR 146.51, shall also adhere to the following specifications:

- (a) A removable lid shall be opaque from the point where it meets the face plate to a point at least four inches from the face plate;
- (b) The sides and back above the base plate shall be opaque; and
- (c) A device within the shoe shall, when engaged, prevent the cards from moving backward in the shoe.
- (d) A Harrigan plate be used in all baccarat shoes so the backs of the cards cannot be seen until drawn

(7) A pai gow poker dealing shoe, in addition to meeting the requirements of 205 CMR 146.51, may, in the discretion of the gaming licensee, also contain a device on the front of the face plate so as to preclude the players from viewing the next card to be dealt.

(8) All dealing shoes and shuffling devices in the casino shall be inspected at the beginning of each gaming day by a floorperson assigned to the table prior to cards being placed in them. The purpose of this inspection shall be to assure that there has been no tampering with the shoe or shuffling device.

(9) For gaming tables at which a manual dealing shoe is utilized, the shoe shall be located on the side of the gaming table to the left of the dealer, and the discard rack shall be located on the side of the gaming table to the right of the dealer. For gaming tables at which either an automated card shuffling device or an automated dealing shoe is utilized, the discard rack shall be on the side of the gaming table opposite such device or shoe.

146.52: Pai Gow Tiles; Physical Characteristics

(1) Pai gow shall be played with a set of 32 rectangular blocks to be known as tiles. Each tile in a set shall be identical in size and shading to every other tile in the set.

(2) Each tile used in gaming at pai gow shall:

- (a) Be made of a non-transparent black material, formed in the shape of a rectangle, and be of a size no smaller than 2.500 inches in length, 1.000 inch in width and .375 of an inch in thickness;
- (b) Have the surface of each of its sides perfectly flat, except that the front side of each tile shall contain spots which shall extend into the tile exactly the same distance as every other spot;
- (c) Have on the back of each tile an identifying feature unique to each casino;
- (d) Have the texture and finish of each side, with the exception of the front side, exactly identical to the texture and finish of all the other sides;
- (e) Have the back and sides of each tile within a set be identical and no tile within a set shall contain any marking, symbol or design that will enable a person to know the identity of any element on the front side of the tile or that will distinguish any tile from any other tile within a set; and

(f) Have identifying spots on the front of the tiles which are either red or white or both.

(3) Each set of tiles shall be composed of 32 tiles as set forth in the Authorized Rules of the Game ~~for~~of Pai Gow.

(4) Each set of tiles shall be packaged separately and completely sealed in such a manner so that any tampering shall be evident.

146.53: Pai Gow Tiles: Receipt; Storage; Inspections, and Removal From Use

(1) When sets of tiles to be used at pai gow are received from the manufacturer or distributor thereof, they shall immediately following receipt be inspected by a member of the security department and a supervisor to assure that the seals on each package are intact, unbroken and free from tampering. Packages that do not satisfy these criteria shall be inspected at this time to assure that the tiles conform to Bureau standards and there is no evidence of tampering. Packages satisfying these criteria, together with packages having unbroken, intact, and untampered seals shall then be placed for storage in a locked cabinet within a primary or secondary storage area. Sets of tiles which are to be distributed to gaming pits or tables for use in gaming shall be distributed from a locked cabinet in the cashiers' cage or from another secure primary storage area, the location and physical characteristics of which shall be approved by the Bureau. Secondary storage areas shall be used for the storage of surplus tiles. Tiles maintained in secondary storage areas shall not be distributed to gaming pits or tables for use in gaming until the tiles have been moved to a primary storage area. All secondary storage areas shall be located in secure areas, the location and physical characteristics of which shall be approved by the Bureau.

(2) All primary and secondary storage areas, other than the cashiers' cage, shall have two separate locks. The security department shall maintain one key and the casino department or cashiers' cage shall maintain the other key; provided, however, that no person employed by the casino department below the table games shift manager in the organization hierarchy shall have access to the casino department key. Tiles stored in a cabinet within the cashiers' cage shall be secured by a lock, the key to which shall be maintained by a table games shift manager or casino supervisor thereof.

(3) Immediately prior to the commencement of each gaming day and at such other times as may be necessary, the table games shift manager or supervisor thereof, in the presence of a security officer, shall remove the appropriate number of sets of tiles for that gaming day from a primary storage area. Tiles are to be inspected by surveillance prior to the game beginning for the gaming day or when new tiles are being put into play.

(4) All envelopes and containers used to hold or transport tiles shall be transparent. The envelopes or containers and the method used to seal them shall be designed or

constructed so that any tampering shall be evident.

(5) The table games shift manager or casino supervisor thereof shall distribute sufficient sets of tiles to the pit boss in each pai gow pit. The pit boss shall then distribute the sets to the dealer at each table, and shall place extra sets in reserve at the pit stand. Sets of tiles in reserve shall be placed in a locked compartment, keys to which shall be in the possession of the pit boss or casino supervisor thereof.

(6) If during the course of play any damaged tile is detected, the entire set of tiles shall be immediately replaced. The dealer or floorperson shall request that the pit boss bring a substitute set of tiles to the table from the reserve in the pit stand. The set of damaged tiles shall be placed in a sealed envelope, identified by table number, date and time and shall be signed by the dealer and casino supervisor. The pit boss shall maintain the envelope or container in a secure place within the pit until collection by a casino security officer.

(7) Tiles used at pai gow shall be changed at least every 12 hours. The supervisor shall collect used tiles which shall be placed in a sealed envelope or container. A label shall be attached to each envelope or container which shall identify the table number, date and time and shall be signed by the dealer and casino supervisor. The pit boss shall maintain the envelopes or containers in a secure place within the pit until collection by a casino security officer.

(8) The gaming licensee shall remove any tiles at any time of the gaming day if there is any indication of tampering, flaws, scratches, marks or other defects that might affect the integrity or fairness of the game, or at the request of the Commission or the Bureau.

(9) All extra sets of tiles in reserve which have been opened shall be placed in a sealed envelope or container, with a label attached to each envelope or container which identifies the date and time and is signed by the pit boss.

(10) At the end of each gaming day or at such other times as may be necessary, a security officer shall collect and sign all envelopes or containers with damaged tiles, tiles used during the gaming day, and all extra tiles in reserve which have been opened, and shall return the envelopes or containers to the security department.

(11) At the end of each gaming day or at such other times as may be necessary, a table games shift manager or supervisor thereof may collect all extra sets of tiles in reserve which have not been opened. If collected, all unopened sets of tiles shall either be cancelled or destroyed or returned to the storage area.

(12) When the envelopes or containers of used tiles and reserve sets of tiles which have been opened are returned to the security department, they shall be inspected for tampering, marks, alterations, missing or additional tiles or anything that might indicate

unfair play.

(a) The gaming licensee shall cause to be inspected all sets of tiles used during the gaming day.

(b) The procedures for inspecting all sets of tiles shall at least include the following:

1. The sorting of tiles by pairs;
2. The visual inspection of the sides and back of each tile for tampering, markings or alterations;
3. The inspection of the sides and back of each tile with an ultra-violet Light; and
4. White light to ensure no light can be seen coming through the tile ensuring that it is not transparent or translucent

(c) The individual performing the inspection required by 205 CMR 146.53 shall complete a work order form which shall detail the procedures performed and list the tables from which the tiles were removed and the results of the inspection. The individual shall sign the form upon completion of the inspection procedures.

(d) Evidence of tampering, marks, alterations, missing or additional tiles or anything that might indicate unfair play discovered at this time, or at any other time, shall be immediately reported to the security department and the Bureau. A security department member shall complete a two-part Discrepancy Report, which Report along with the evidence shall be retrieved by an agent of the Bureau.

The original and duplicate Report shall contain at a minimum:

1. The date and shift of inspection;
2. The name of the supervisor conducting the inspection. The inspection required by this subsection shall be performed by a supervisor other than the one who originally inspected the tiles;
3. The pit number, table number, and type of game;
4. A description (for example, shaved corners);
5. The signature of the supervisor conducting the inspection;
6. The signature of the security representative taking custody of the tile; and
7. The signature of the agent of the Bureau inspecting or accepting the tile, who shall retain the original and return the duplicate to security. A receipt shall be issued to the agent of the Bureau for any tile retained by the Bureau. The receipt shall be signed by the security representative releasing the tile to the Bureau and the agent of the Bureau accepting the tile. The receipt shall be retained with the Security copy of the Discrepancy Report. Any tile not retained by the Bureau shall be destroyed in accordance with the licensee's destruction procedures.

(e) If after completing the inspection procedures required in 205 CMR 146.53, it

is determined that a complete set of 32 tiles removed from a gaming table is free from tampering, markings, or alterations, that set may be returned to the pai gow storage area for subsequent gaming use in accordance with the gaming licensee's internal control procedures. In no event may individual tiles from different sets be used to make a complete set for subsequent gaming use.

- (13) The gaming licensee shall include in their internal control, procedures for:
- (a) An inventory system which shall include the recordation of at least the following:
 - 1. The balance of sets of tiles on hand;
 - 2. The sets of tiles removed from storage;
 - 3. The sets of tiles returned to storage or received from the manufacturer;
 - 4. The date of the transaction; and
 - 5. The signatures of the individuals involved;
 - (b) A reconciliation on a daily basis of the sets of tiles distributed and the sets of tiles destroyed and cancelled, the sets of tiles returned to the storage area and, if any, the sets of tiles in tile reserve; and
 - (c) A physical inventory of the sets of tiles at least once every three months. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the balance of the sets of tiles on hand as required 205 CMR 146.53(13)(a)(1). Any discrepancies shall immediately be reported to the Bureau.
- (14) Other than tiles retained for Bureau inspection, tiles shall be cancelled or destroyed within 72 hours of collection by the security department. In addition, once tiles retained as evidence by the Bureau are released to the security department, the tiles shall immediately be destroyed or cancelled.
- (15) Destruction and cancellation of tiles shall take place in a secure place, the location and physical characteristics of which shall be approved by the Bureau. The adequacy of the destruction and cancellation process shall be approved by the Bureau. Destruction of tiles shall be by shredding by the security department or a vendor approved by the Bureau. Cancellation of tiles shall be by drilling a circular hole of at least one fourth of an inch in diameter through the center of each card in the deck.

146.54 Inspection and Approval of Gaming Equipment and Related Devices and Software

- (1) No gaming equipment or any related device or software shall be used in a gaming establishment unless it is identical in all mechanical, electrical, electronic or other aspects to a prototype thereof that has been reviewed and approved for use by the independent testing lab certified by the commission.
- (2) The following equipment shall be certified by an approved internal or independent testing lab followed by an on-site inspection by the Bureau prior to initial use or following any modification:

1. Slot machines;
2. Multiplayer systems;
3. Electronic table games;
4. Server supported slot systems;
5. Slot machine bonus systems;
6. Progressive equipment;
7. Kiosks;
8. Account based wagering systems;
9. Wireless wagering devices;
10. Slot monitoring systems;
11. Gaming voucher systems; and
12. Devices used in conjunction with a slot monitoring system.

(3) Any evidence that an item of gaming equipment or a related device or software used in a gaming facility has been tampered with or altered in any way which would affect the integrity, fairness, or suitability of the item for use in a casino shall be immediately reported to the Bureau. The Bureau shall ensure that any such item is maintained in a secure manner.

(4) A gaming licensee and gaming device vendor shall comply with, and the commission adopts and incorporates by reference, *Gaming Laboratories International, LLC Standard GLI-25: Dealer Controlled Electronic Table Games*, version 1.2, released September 6, 2011, subject to the following amendments:

- (a) Delete section 1.1 and replace with the following: “The following sets forth the technical standards for dealer controlled electronic table games as identified in 205 CMR 146. This GLI standard is adopted in whole subject to the modifications described in 205 CMR 146.54(4). The standard and modifications should at all times be read in conjunction with 205 CMR and the standards referenced in section 1.3.1 so as to create a harmonious regulatory framework.

146.55 Approval of Gaming Equipment / Approval of New Gaming Equipment

(1) At the Bureau’s request, the manufacturer will supply a sample of suggested equipment for review and testing.

(2) A gaming licensee, in conjunction with other interested parties, may petition the Bureau in writing for the approval of new gaming equipment in accordance with the process set forth in 205 CMR 147 related to petitions for a new game or game variation. New gaming equipment pending approval shall be permitted to be used during new game or game variation field trials conducted pursuant to 205 CMR 147.04(5).

146.56 Security of Gaming Equipment

(1) Any equipment used for the operation of a gaming table that is stored in inventory shall be secured in a locked area with dedicated closed circuit television system coverage. This shall include, but not be limited to cards, dice, pai gow tiles, shuffle machines, wheels or devices that can affect or determine the outcome of the game. The areas to be secured shall include pit stands, card and dice storage rooms or any other back of house table games equipment storage areas and any other areas so designated by the Commission.

(2) Any gaming equipment that will be sold by a gaming licensee to an outside party shall require a notification to the Bureau office within the gaming establishment with the specific details. Cards and dice may be sold at the gift shop after the licensee has submitted their procedure for the process to the Bureau.

(3) All gaming equipment included in 205 CMR 146.00 shall be imprinted with a unique serial number.

146.58: Crazy 4 Poker Table; Physical Characteristics

(1) Crazy 4 poker shall be played on a table having positions for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a Crazy 4 poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) Separate designated betting areas at each betting position for the placement of the Ante, Play, Super Bonus and Queens Up Wagers for each player. The Super Bonus betting area must be located to the right of the Ante Wager betting area and be separated by an “=” symbol;
- (c) If the licensee offers either the Four or Five-Card Progressive Payout Wager ~~authorized under Section 7 of~~ pursuant to the Authorized Rules of the Game ~~for of~~ Crazy 4 Poker, a separate area designated for the placement of the Progressive Payout Wager for each player;
- (d) If a licensee offers the Five Card Hand Bonus Wager ~~authorized under Section 7 of~~ pursuant to the Authorized Rules of the Game ~~for of~~ Crazy 4 Poker, each betting position must contain an electronic wagering system for the placement of the Five Card Hand Bonus Wager;
- (e) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds or amounts for all permissible wagers posted at each Crazy 4 Poker table;
- (f) Inscriptions that advise patrons of the following:
 - (i) The best four-card hand plays.
 - (ii) The dealer qualifies with a king or better.

- (iii) A player who has a pair of aces or better may place a Play Wager in an amount up to three times the player's Ante Wager.
- (iv) The player's Super Bonus Wager shall be returned if the player beats or ties the dealer with a hand that is not a straight or better.

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

(5) If the gaming licensee offers either a Four or Five-Card Progressive Payout Wager ~~in accordance with Section 7 of~~ pursuant to the Authorized Rules of the Game ~~for of~~ Crazy 4 Poker, the Crazy 4 Poker table must have a progressive table game system, in accordance with 205 CMR 143.02 for the placement of Progressive Payout Wagers. If the gaming licensee is offering a Progressive Payout Wager on multiple linked tables or games in the same gaming establishment, the progressive table game system must comply with 205 CMR 143.02. The progressive table game system must include:

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

(6) If the gaming licensee offers the Five Card Hand Bonus Wager ~~authorized under Section 7 of~~ pursuant to the Authorized Rules of the Game ~~for of~~ Crazy 4 Poker, the Crazy 4 Poker table must have a table game system, in accordance with 205 CMR 138.62 and an electronic wagering system in accordance 205 CMR 146.63. Each betting position must contain an electronic wagering system for the placement of the Five Card Hand Bonus Wager. The system must include a mechanism, such as a lockout button, that prevents the placement of any Five Card Hand Bonus Wagers that a player attempts to place after the dealer has begun dealing the cards. If the certificate holder is offering a Five Card Hand Bonus Wager on multiple linked tables or games in the same gaming establishment, the progressive table game must comply with 205 CMR 143.02.

146.60: Free Bet Blackjack

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

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

- (a) The name or logo of the gaming licensee;
- (b) A separate betting area designated for the placement of the Blackjack Wager for each player;

(c) The following inscriptions:

- (i) Blackjack pays 3 to 2;
- (ii) Insurance pays 2 to 1;
- (iii) Dealer shall draw to 16 and stand on all 17s or other similar language approved by the Bureau;
- (iv) Blackjack Wagers will push if the dealer's hand has a total point count of 22 or other similar language approved by the Bureau; and
- (v) Surrender is not available on a Free Bet Blackjack table or other similar language approved by the Bureau, unless the gaming licensee posts a sign at each Free Bet Blackjack table specifying that surrender is not available.

(d) If the licensee offers the Push 22 Wager, a separate area designated for the placement of the wager for each player;

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

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

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

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

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

146.61: Heads Up Hold 'Em

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

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

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

- (b) A separate designated betting area at each betting position for the placement of the ante wager;
- (c) A separate designated betting area located immediately behind each ante wager betting area for the placement of the raise wager;
- (d) The odds wager, trips plus wager and pocket bonus wager ~~authorized by Section 6 of~~ permitted pursuant to the Authorized Rules of the Game ~~for of~~ Heads Up Hold 'em, shall be placed in a separate designated betting area at each betting position for the placement of each wager as follows:
 - (i) The odds wager designated betting area shall be to the right of and aligned with the ante wager;
 - (ii) The trips plus wager designated betting area shall be in front of the ante wager;
 - (iii) The pocket bonus wager designated betting area shall be to the right of and aligned with the trips plus designated betting area, and in front of the odds wager designated betting area;
- (d) Heads Up Hold 'em tables shall have inscriptions that advise patrons of the payout odds of the odds wager, bad beat bonus, trips plus wager, and pocket bonus wager ~~authorized as described in Section 11 of~~ the Authorized Rules of the Game ~~for of~~ Heads Up Hold 'em, respectively; and inscriptions that advise patrons of the permissible raise wagers.

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

146.62: High Card Flush; physical characteristics

- (1) High Card Flush shall be played at a table having betting positions for no more than six players on one side of the table and a place for the dealer on the opposite side.
- (2) A true-to-scale rendering and color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a High Card Flush table shall contain, at a minimum:
 - a) The name or trade name of the gaming licensee;
 - b) A separate designated betting area at each betting position for the placement of the ante wager;
 - c) A separate designated betting area located immediately in front of each ante wager betting area for the placement of the raise wager;
 - d) If a gaming licensee offers the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager ~~authorized by Section 6 of~~ permitted pursuant to the Authorized Rules of the Game ~~for of~~ High Card Flush, a separate designated betting area at each betting position for the placement of each wager, which shall be located behind each ante wager betting area;

- e) If a gaming licensee offers the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager ~~authorized by Section 6 of~~ pursuant to the Authorized Rules of the Game ~~for of~~ High Card Flush, inscriptions that advise patrons of the payout odds for the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager, as described in ~~Section 11 of~~ the Authorized Rules of the Game ~~for of~~ High Card Flush.
- f) Inscriptions that advise patrons of the permissible raise wagers, as described ~~in Section 6 of~~ the Authorized Rules of the Game ~~for of~~ High Card Flush; and;
- g) Inscriptions that advise patrons of the dealer's qualifying hand, as ~~described in Section 1 of~~ defined in the Authorized Rules of the Game ~~for of~~ High Card Flush.

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

(4) If a gaming licensee offers the Progressive payout wager ~~authorized by Section 6 of~~ pursuant to the Authorized Rules of the Game ~~for of~~ High Card Flush, each High Card Flush table shall be equipped with an approved table game progressive payout wager system for the placement of Progressive payout wagers, equipped with additional approved features or standards including, but not limited to, those required pursuant to 205 CMR 143.02.



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 in **205 CMR 134.03: Gaming Service Employees**; 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. It would allow the Division of Licensing to extend the temporary time period for employee training in the pre-opening phase of a gaming establishment without those individuals having to become licensed or registered, following consideration of the gaming licensee's written explanation of need, continuing training plan, and expected duration. 205 CMR 134.03 is largely governed by G.L. c. 23K §§ 4, 5, 12, 16, 26, and 30.

These amendments apply directly to gaming licensees and service employees. Accordingly, there are no small businesses impacted. 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:

Given the nature of this amendment, there are no small businesses that will be impacted.

2. State the projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation:

Projected reporting, recordkeeping and other administrative costs may be reduced for compliance with the proposed amendment, in that there will be less individuals subject to the registration requirement.

3. State the appropriateness of performance standards versus design standards:

Licensing necessarily requires design standards so people know who is to be licensed or registered, and what information has to be submitted.

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.

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the commonwealth:



Massachusetts Gaming Commission

This amendment will most likely not affect small businesses in an administrative capacity, and is unlikely to deter or encourage the formation of new businesses in the Commonwealth at this time.

Massachusetts Gaming Commission

By:

Shara Bedard
Paralegal

Dated: _____



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com

134.03: Gaming Service Employees

(1)(a) An individual employed by a gaming licensee who is not classified as a key gaming employee in accordance with 205 CMR 134.01, or a gaming employee in accordance with 205 CMR 134.02, shall be designated as a gaming service employee and shall register in accordance with 205 CMR 134.09 prior to engaging in the provision of employment services. An individual employed by a vendor of a gaming establishment for work in a gaming establishment shall be considered a gaming service employee unless otherwise specified in 205 CMR 134.02.

(b) Pursuant to St. 2017, c. 110, § 3, the commission may, in its discretion, exempt certain gaming service employees by job position from the registration requirement. The commission, or its designee, may require a gaming licensee to produce any information deemed necessary to evaluate the essential functions of a job position. The commission may at any time, in its discretion, re-classify any job position.

(2) During the pre-opening phase of a gaming establishment, and continuing for up to 30 days from the date an Operation Certificate is issued in accordance with 205 CMR, a gaming licensee may temporarily allow an individual(s) who is employed at a gaming property which is owned and/or operated by it, its parent, or an affiliated company to assist with gaming establishment employee training and related purposes for up to 60 days without those individuals having to become licensed or registered in accordance with 205 CMR 134.00, provided that the gaming licensee does the following:

(a) Supplies the Bureau a reasonable time in advance of arrival with the name of the individual, name of the gaming property at which they are employed, the position at the gaming property at which they are employed, a description of the reason for the individual being at the gaming establishment including the services to be performed, the anticipated duration of their stay, and any other information requested by the Bureau;

(b) Ensures all individuals performing services under 205 CMR 134.03(2) carry identification and wear a badge issued by the gaming licensee that is distinguishable from those that are issued to employees of the gaming establishment and that is clearly visible at all times while at the gaming establishment;

(c) If the individual is licensed, certified, or otherwise approved for employment by the jurisdiction which the gaming property in which they are employed is located, an individual licensed as a key gaming employee in accordance with 205 CMR 134.00 shall attest in writing that the individual is in good standing in that jurisdiction; and

(d) Ensures that the individual is accompanied by an individual who is licensed or registered in accordance with 205 CMR 134.00 anytime they are in a restricted area of the gaming establishment.

(3) The Division of Licensing, after consultation with the Bureau, may extend the period of allowance set forth in 205 CMR 134.03(2) following consideration of the gaming licensee's written explanation of need, continuing training plan, and expected duration.

2013 MASSACHUSETTS JOCKEYS HEALTH AND WELFARE DISTRIBUTION ELIGIBILITY QUALIFICATIONS FOR PARTICIPATION

ACTIVE RIDER QUALIFICATIONS

The JOCKEY is eligible if the following qualifications are met:

1. Must be an ACTIVE Jockey licensed in Massachusetts AND
2. Must ride at least ~~one hundred (100)~~ 15% of the total mounts ridden during the previous calendar year in legal pari-mutuel races conducted in Massachusetts, ~~except that the number of qualifying mounts shall be reduced to (50) per year for a jockey who has ridden at least one hundred (100) mounts per year in Massachusetts for a minimum of ten (10) years previously OR if the jockey has ridden at least 51% of all of his or her mounts for the year, to be no less than 50 mounts, at a Massachusetts Track within the designated racing season.~~
3. If a jockey qualifies in the previous year AND he or she becomes TEMPORARILY DISABLED in the year for consideration, then the Jockeys' Guild and/or Massachusetts Gaming Commission MAY extend eligibility of benefits if all of the following conditions are met:
 - a. If the jockey was injured in Massachusetts, AND
 - b. The jockey's activity in Massachusetts during the year of distribution, prior to becoming TEMPORARILY DISABLED, was on pace to accumulate the necessary mount requirements for qualification.
4. ~~Notwithstanding subsections (2) and (3) above, a jockey who has been retired for no more than ten (10) years and resumes riding in Massachusetts, then may qualify for benefits after riding at least fifty (50) mounts in Massachusetts provided said jockey has ridden a minimum of three thousand (3,000) career mounts in Massachusetts and, additionally, has been a licensed Massachusetts jockey for at least ten (10) years.~~ Furthermore, in the event a qualified, retired member resumes riding, then that jockey shall retain his or her eligibility regardless of the number of mounts ridden in the year of return.
5. The amounts paid to qualifying jockeys may vary depending on the number of mounts in the qualifying year based on reasonable and consistent criteria established by the Jockeys' Guild and approved by the Massachusetts Gaming Commission.

The Jockeys' Guild and/or the Massachusetts Gaming Commission shall have discretion to review each request pursuant to subsections (3) and (4) independently on a case-by-case basis, and the resulting determination of qualification shall be non-precedential.

RETIRED MEMBER QUALIFICATIONS

The JOCKEY is eligible if the following qualifications are met:

1. Must have been a member of the Jockeys' Guild, AND
2. Must not hold a license as a jockey in any racing jurisdiction, AND
3. Must have ridden five thousand (5,000) career mounts in the United States OR ten (10) years as a licensed Massachusetts jockey, AND
4. Must have ridden at least one hundred (100) mounts in legal pari-mutuel races per year in the United States for five (5) consecutive years before retirement AND ridden at least fifty (50) of the aforementioned mounts per year must have been in the State of Massachusetts for five (5) consecutive years before retirement AND at least one of the five (5) years had to have been since 2007.

**~~2013~~ MASSACHUSETTS JOCKEYS HEALTH AND WELFARE DISTRIBUTION
ELIGIBILITY QUALIFICATIONS FOR PARTICIPATION**

PERMANENTLY DISABLED QUALIFICATIONS

A QUALIFYING JOCKEY is eligible if the following qualifications are met:

1. Must have been a member of the Jockeys' Guild at the time of the injury, AND
2. Must not hold a license as a jockey in any racing jurisdiction, AND
3. Must have suffered a career-ending injury at a Massachusetts racetrack recognized by the Massachusetts Gaming Commission OR must achieve the retired member qualifications if injured at a track outside of Massachusetts, AND
4. Must be permanently disabled under the Social Security Act and must qualify for Medicare benefits under Part A, B, and D.

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MASSACHUSETTS JOCKEYS HEALTH AND WELFARE DISTRIBUTION ELIGIBILITY QUALIFICATIONS FOR PARTICIPATION

ACTIVE RIDER QUALIFICATIONS

The JOCKEY is eligible if the following qualifications are met:

1. Must be an ACTIVE Jockey licensed in Massachusetts AND
2. Must ride at least 15% of the total mounts ridden during the previous calendar year in legal pari-mutuel races conducted in Massachusetts.
3. If a jockey qualifies in the previous year AND he or she becomes TEMPORARILY DISABLED in the year for consideration, then the Jockeys' Guild and/or Massachusetts Gaming Commission MAY extend eligibility of benefits if all of the following conditions are met:
 - a. If the jockey was injured in Massachusetts, AND
 - b. The jockey's activity in Massachusetts during the year of distribution, prior to becoming TEMPORARILY DISABLED, was on pace to accumulate the necessary mount requirements for qualification.
4. Furthermore, in the event a qualified, retired member resumes riding, then that jockey shall retain his or her eligibility regardless of the number of mounts ridden in the year of return.
5. The amounts paid to qualifying jockeys may vary depending on the number of mounts in the qualifying year based on reasonable and consistent criteria established by the Jockeys' Guild and approved by the Massachusetts Gaming Commission.

The Jockeys' Guild and/or the Massachusetts Gaming Commission shall have discretion to review each request pursuant to subsections (3) and (4) independently on a case-by-case basis, and the resulting determination of qualification shall be non-precedential.

RETIRED MEMBER QUALIFICATIONS

The JOCKEY is eligible if the following qualifications are met:

1. Must have been a member of the Jockeys' Guild, AND
- ~~2. Must not hold a license as a jockey in any racing jurisdiction, AND~~
2. Retired from racing on or after January 1, 2008, AND
3. Must have ridden ~~at least five thousand (5,000)~~ three thousand (3,000) career mounts in legal pari-mutuel races in the United States conducted by the State of Massachusetts OR ten (10) years as a licensed Massachusetts jockey, AND
4. Must have ridden ~~at least one hundred (100) mounts in legal pari-mutuel races per year in the United States for five (5) consecutive years before retirement AND ridden at least fifty (50) of the aforementioned mounts per year must have been~~ in the State of Massachusetts for five (5) consecutive years before retirement. ~~AND at least one of the five (5) years had to have been since 2007.~~
5. ~~Must not hold a license as a jockey in any racing jurisdiction, AND~~ For the purposes of this section, an individual, who meets the aforementioned qualifications, shall be considered to be retired from racing if the individual has ridden in fewer than fifty (50) races at any track in the United States licensed to conduct pari-mutuel wagering.

PERMANENTLY DISABLED QUALIFICATIONS

A QUALIFYING JOCKEY is eligible if the following qualifications are met:

1. Must have been a member of the Jockeys' Guild at the time of the injury, AND
2. Must not hold a license as a jockey in any racing jurisdiction, AND
3. Must have suffered a career-ending injury at a Massachusetts racetrack recognized by the

Effective: 01/01/~~2016~~2017

Reviewed: 3/14/2018

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MASSACHUSETTS JOCKEYS HEALTH AND WELFARE DISTRIBUTION ELIGIBILITY QUALIFICATIONS FOR PARTICIPATION

Massachusetts Gaming Commission OR must achieve the retired member qualifications if injured at a track outside of Massachusetts, AND

4. Must be permanently disabled under the Social Security Act and must qualify for Medicare benefits under Part A, B, and D.

MGL Chapter 128A Section 5 (h) (4)

To pay: \$80,000 annually to an organization, as determined by the commission, which provide health, medical, food, substance abuse treatment and other social services for persons who are employed in the stable or the backstretch area of the running horse racing licensee located in Suffolk county; \$20,000 annually to the commission, which is authorized and directed to establish rules and regulations for the purpose of using these monies to provide economic assistance to any person employed in the racing facility, the stable or the backstretch area of the running horse racing licensee located in Suffolk county who is facing hardship due to illness or unforeseen tragedy; and \$65,000 annually to an organization, as determined by the commission, that represent the majority of jockeys who are licensed by the commission and regularly ride in the commonwealth for the purpose of providing health and other welfare benefits to active, disabled or retired jockeys; and provided further, that any organization receiving an allocation from any of the said amounts shall make an annual report with the joint committee on government regulations and the house and senate committees on ways and means detailing its expenditures from said allocations.



TO: Chairman Crosby, Commissioners

FROM: Jill Griffin, Director of Workforce, Supplier and Diversity Development

CC: Ed Bedrosian, Executive Director; Catherine Blue, General Counsel

DATE: May 10, 2018

RE: Grants to Expand Economic Access in the Commonwealth's New Casino Industry

RFP Overview

The Massachusetts Gaming Commission (MGC) sought proposals in March to aide in advancement of economic development within the state's emerging casino industry with a goal of maximizing equity and inclusion for licensee employees and vendors. We aim to ensure an adequate pool of available, qualified, diverse and prepared applicants for the gaming and hospitality jobs. Proposals were intended to enable access to these emerging casino careers and business opportunities. The RFP sought to inspire collaborative coalitions, partnerships, grassroots organizations and non-profits to aide in providing programs, outreach, and resources to achieve at least one of the following goals:

- 1) Promote awareness of job opportunities and assist with interview/skill preparation for potential job candidates within the Host and Surrounding Communities of one of the casino properties.
- 2) Remove road blocks for the unemployed, underemployed and/or candidates with employment challenges.
- 3) Increase net job gain via initiatives benefiting minorities, women and veterans.
- 4) Strategies for maximizing contracting opportunities for vendors/suppliers with the licensee

Grant Awardees and Descriptions

| Eastern, MA|

Asian American Civic Association (AACA)

The AACA will offer program enhancements that increase minority access to the casino industry, working with members of the Asian American, immigrant and economically disadvantaged populations in Greater Boston to ensure awareness of job opportunities, and increased placement success. The AACA will do this through direct preparation of interested candidates via pre-screening resumes and qualifications and offering mock interviews; as well as referrals to English language courses and social service and benefits programs (such as housing assistance and child care services.) ***\$15,000 awarded***

BEST Hospitality Training (BEST)

With the grant funds provided, BEST will work to create a hospitality training pipeline focused on casino careers by meeting with industry stakeholders in the Boston area to develop a marketing strategy, informational sessions for diverse candidates looking to enter the hospitality industry, determining a qualified community organization to offer BEST's English for Hospitality curriculum and identifying a local partner to host the Wynn Model Hotel Guest Room in the Everett area for training purposes. ***\$15,000 awarded***

Chelsea Collaborative and La Comunidad

The Chelsea Collaborative and La Comunidad will collaborate to support a workforce pipeline initiative to bridge the unemployment and income gap for Chelsea and Everett-area residents. Their grant-funded work will consist of expansion of adult education (ESOL and computer proficiency courses) individualized career development case management (including industry "fit" assessment and application completion,) and creation of a data-tracking pipeline for continued follow-up with interested residents. ***\$12,260 awarded***

| Statewide |

Hispanic American Institute (HAI)

The funding provided to the HAI will support the development of local resource partners for the casinos, promotion of vendor opportunities and technical assistance for minority-owned businesses. These goals will be obtained via workshops, networking events and educational forums with Chelsea Chamber of Commerce, North Shore Latino Business Association and La Comunidad, Inc. and the ongoing Quarterly Small Business Breakfast at Wynn Boston Harbor. The grant also allows for marketing and social media promotion, as well as planning for events and expanding partnerships in Western MA. ***\$12,000 awarded***



| Western, MA |

Hampden County Sheriff Department

The Sheriff's Department has been granted funding to train current custodial inmates and a recently released population for certification in the Customer Service Gold program from the American Hotel and Lodging Educational Institute. ESOL and adult education will be offered for students in the program, as well. Education will also be provided on MGM's SkillSmart software and on the available casino opportunities. All students will also receive instruction on how to seal their criminal record to increase eligibility for employment with MGM. ***\$12,715.99 awarded***

Quaboag Valley Community Development Corporation (QVCDC)

Through direct network outreach, advertising (such as on the Quaboag Connector vehicles) and their connections within the local community, the QVCDC will promote awareness of both vendor opportunities and job openings. The grant will also support culinary ServSafe courses and Job Readiness Skills courses for under and unemployed job seekers aspiring to work with MGM Springfield. To remove road blocks for those interested in the courses and opportunities at MGM, QVCDC will purchase travel vouchers for the Quaboag Connector to ensure dependable transportation. ***\$7,722 awarded***