



NOTICE OF MEETING AND AGENDA

(Revised 1/18/23. Revised 1/19/23)

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

Friday | January 20, 2023 | 11:00 a.m.

VIA REMOTE ACCESS: 1-646-741-5292

MEETING ID/ PARTICIPANT CODE: 112 738 1553

All meetings are streamed live at www.massgaming.com.

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

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

PUBLIC MEETING - #425

1. Call to Order – Cathy Judd-Stein, Chair
2. Administrative Update – Karen Wells, Executive Director
 - a. **Determination of Sports Wagering Category 1/Retail Launch (Jan. 31) Time**
3. Legal – Todd Grossman, General Counsel; Carrie Torrisi, Deputy General Counsel; Caitlin Monahan, Deputy General Counsel
 - a. Sports Wagering Regulations:
 - i. 205 CMR 256.00: *Sports Wagering Advertising* – Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency. **VOTE**
 - ii. 205 CMR 239.00: *Continuing Disclosure and Reporting Obligations of Sports Wagering Licensees* - Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency. **VOTE**
 - iii. 205 CMR 241.00: *Surveillance and Monitoring* – Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency. **VOTE**



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- iv. 205 CMR 255.00: *Play Management* – Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency. **VOTE**
- v. 205 CMR 254.00: *Temporary Prohibition from Sports Wagering* – Revised Regulation for review and approval to post the updated version for comment. **VOTE**
- ~~vi. 205 CMR 229.00: *Review of a Proposed Transfer of Interests* – Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency. **VOTE**~~
- vii. 205 CMR 213.00: *Withdrawal of an Application* - Regulation and Small Business Impact Statement for review and approval to commence the promulgation process and/or adoption via emergency. **VOTE**

- 4. Sports Wagering Implementation – Karen Wells, Executive Director
 - a. Continued Review and Approval of Sports Wagering Events Catalog – Sterl Carpenter; Regulatory Compliance Manager – Gaming Agents **VOTE**
 - ~~b. Approval of House Rules – Category 1 (Retail) – Todd Grossman, General Counsel; Bruce Band; Director of Sports Wagering **VOTE**~~
 - c. Floor Plan Approvals – Retail - Bruce Band; Director of Sports Wagering **VOTE**

5. Commissioner Updates

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

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: January 18, 2023 | 10:45 a.m. EST – Reposted January 19, 2023 | 12:30pm EST

January 19, 2023

Cathy Judd-Stein
 Cathy Judd-Stein, Chair

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



Massachusetts Gaming Commission



Legal Division

TO: Cathy Judd-Stein, Chair
 Eileen O’Brien, Commissioner
 Brad Hill, Commissioner
 Nakisha Skinner, Commissioner
 Jordan Maynard, Commissioner

FROM: Carrie Torrisi, Deputy General Counsel
 Caitlin Monahan, Deputy General Counsel
 Mina Makarious, Anderson & Kreiger
 Christina Marshall, Anderson & Kreiger
 Lon Povich, Anderson & Kreiger

DATE: January 18, 2023

RE: 205 CMR 256: Sports Wagering Advertising – Revisions since January 12th

Enclosed for the Commission’s review is a revised set of regulations at 205 CMR 256.00 governing the advertising of Sports Wagering in the Commonwealth. It includes the following revisions to the draft previously presented to the Commission on January 12:

- 256.04 is reorganized to place the rules regarding advertising of promotions (256.04(5)) and specific prohibitions on particular types of false and misleading advertising (256.04(6)) next to each other since they address more directly related topics. This draft also removes the reference to promotions for “free” wagers in 256.04(5), to better align these two sections.
- 256.05 (Advertising to Youth) has been edited to make clearer that it lists *prohibited* forms of advertising. Under this structure, we believe it is now clearer that the prohibitions in 256.05(4) apply to advertising to an audience where 25% or more is expected to consist of individuals *under* 21 years of age. This is consistent with the phraseology used by most states, but is a more stringent requirement than found in many other states that only prohibit advertising where a majority (i.e. over 50%) of the audience is under 21 years of age.



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- 256.06 is edited to include standards for the size of required responsible gaming messaging in a variety of different mediums. It is modeled on similar requirements in Pennsylvania and New York.
- 256.09 is edited to make clear that the Commission does *not* permit endorsements by athletes under 21 years of age, even if they are already professional athletes.
- 256.11 includes a suggested provision that permits the Commission to impose as discipline a requirement that all advertisement issued by an operator be submitted for review at least ten (10) business days before publication, distribution, or airing to the public. This is similar to a provision that will be required for all advertising by the State of Maine under recently promulgated regulations (available at: <https://www.maine.gov/dps/gamb-control/sports-wagering/2023/1ST%20SW%20PROPOSED%20TEXT%20%2001.11.23.pdf>, Chapter 64)

205 CMR 256: SPORTS WAGERING ADVERTISING

Section

- 256.01: Third Parties
- 256.02: Application
- 256.03: Internal Controls
- 256.04: False or Misleading Advertising
- 256.05: Advertising to Youth
- 256.06: Advertising to Other Vulnerable Persons
- 256.07: Self-Excluded Persons
- 256.08: Disruption
- 256.09: Endorsement
- 256.10: Records
- 256.11: Enforcement

256.01: Third Parties

- (1) Each Sports Wagering Operator shall be responsible for the content and conduct of any and all advertising, marketing, or branding done on its behalf or to its benefit whether conducted by the Sports Wagering Operator, an employee or agent of the Sports Wagering Operator, or an affiliated entity or a third party pursuant to contract, regardless of whether such party is also required to be licensed or registered as a Sports Wagering Vendor or Non-Sports Wagering Vendor.
- (2) Each Sports Wagering Operator shall provide a copy of the regulations contained herein to all advertising, marketing, branding and promotions personnel, contractors, agents, and agencies retained by the Sports Wagering Operator or its agents and shall ensure and require compliance herewith.
- (3) No Sports Wagering Operator may enter into an agreement with a third party to conduct advertising, marketing, or branding on behalf of, or to the benefit of, the licensee when compensation is dependent on, or related to, the volume of patrons or wagers placed, or the outcome of wagers.
- (4) Any advertisement for Sports Wagering shall disclose the identity of the Sports Wagering Operator.

256.02: Application

- (1) The provisions of this section shall apply to all advertising, marketing, and branding for Sports Wagering aimed at, published, aired, displayed, disseminated, or distributed in the Commonwealth.
- (2) Sports Wagering advertisements may only be published, aired, displayed, disseminated, or distributed in the Commonwealth by or on behalf of Sports Wagering Operators licensed to offer Sports Wagering in the Commonwealth, unless the advertisement clearly states that the offerings are not available in the

Commonwealth or otherwise makes clear that the offerings are not intended for use in the Commonwealth. Sports Wagering Operators and their agents, employees, or any third party conducting advertising or marketing on their behalf shall not advertise forms of illegal gambling in the Commonwealth.

- (3) No Sports Wagering Operator shall allow, conduct, or participate in any advertising, marketing, or branding for Sports Wagering on any billboard, or other public signage, which fails to comply with any federal, state or local law.

256.03: Internal Controls

Each Sports Wagering Operator shall include in its internal controls submitted pursuant to 205 CMR 138 and 238 provisions to ensure compliance with the requirements of 205 CMR 256.00.

256.04: False or Misleading Advertising

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- (1) No Sports Wagering Operator shall allow, conduct, or participate in any unfair or deceptive advertising, marketing, or branding for Sports Wagering. Advertising, marketing, or branding that is unfair or deceptive includes, but is not limited to, advertising, marketing, or branding that would reasonably be expected to confuse and mislead patrons in order to induce them to engage in Sports Wagering.
- (2) No Sports Wagering Operator shall obscure or fail to disclose any material fact in its advertising, marketing, or branding for sports wagering or use any type, size, location lighting, illustration, graphic, depiction or color resulting in the obscuring of or failure to disclose any material fact in any advertising, marketing, or branding.
- (3) All Sports Wagering advertisements must clearly convey the conditions under which Sports Wagering is being offered, including information about the cost to participate and the nature of any promotions or and information to assist patrons in understanding the odds of winning. Any material conditions or limiting factors must be clearly and conspicuously specified in the advertisement.

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No employee or vendor of any Sports Wagering Operator shall advise or encourage individual patrons to place a specific wager of any specific type, kind, subject, or amount. This restriction does not prohibit general advertising or promotional activities.

(4)

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~~(4)~~(5) A Sports Wagering Operator that engages in any promotion related to Sports Wagering shall clearly and concisely explain the terms of the promotion and adhere to such terms. If a Sports Wagering Operator offers complimentary, or "free" items or promotional credit that are subject to terms, conditions or limitations in order to claim the item or redeem the item or credit, the Operator shall fully disclose all such terms, conditions or limitations through the following methods:

- (a) In all advertisements or inducements where the complimentary item or promotion are advertised;
- (b) If being added to a Sports Wagering Account, through the use of a pop-up message either while the complimentary item or promotional credit is being added or when the patron next logs in to the Account, whichever is earlier; and
- (c) If the offer requires the patron to Wager a specific dollar amount to receive the complimentary item or promotional credit, the amount that the patron is required to Wager of the patron's own funds shall be disclosed in the same size and style of font as the amount of the complimentary item or promotional credit, and the complimentary item or promotional credit shall not be described as free.

~~(5)(1) No employee or vendor of any Sports Wagering Operator shall advise or encourage individual patrons to place a specific wager of any specific type, kind, subject, or amount. This restriction does not prohibit general advertising or promotional activities.~~

- (6) ~~a~~Advertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall ~~not~~:
 - (a) Promote irresponsible or excessive participation in Sports Wagering;
 - (b) Suggest that social, financial, or personal success is guaranteed by engaging in event wagering;
 - (c) Imply or promote Sports Wagering as free of risk in general or in connection with a particular promotion or Sports Wagering offer;
 - (d) Describe Sports Wagering as “free”, “cost free” or “free of risk” if the player needs to incur any loss or risk their own money to use or withdraw winnings from the Wager;
 - (e) Encourage players to “chase” losses or re-invest winnings;
 - (f) Suggest that betting is a means of solving or escaping from financial, personal, or professional problems;
 - (g) Portray, suggest, condone or encourage Sports Wagering behavior as a rite of passage or signifier of reaching adulthood or other milestones;
 - (h) Portray, suggest, condone or encourage Sports Wagering behavior that is socially irresponsible or could lead to financial, social or emotional harm;

- (i) Imply that the chances of winning increase with increased time spent on Sports Wagering or increased money wagered;
- (j) Be placed on any website or printed page or medium devoted primarily to responsible gaming;
- (k) Offer a line of credit to any consumer.

256.05: Advertising to Youth

~~Advertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall state that patrons must be twenty-one years of age or older to participate.~~

~~(1)~~

~~(2)~~ (2) No Sports Wagering Operator shall allow, conduct, or participate in any advertising, marketing, or branding for Sports Wagering that is aimed at individuals under twenty-one years of age.

~~(2)~~ (3) ~~No a~~Advertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall ~~not~~ contain images, symbols, celebrity or entertainer endorsements, or language designed to appeal primarily to individuals younger than twenty-one years of age.

~~(3)~~ (4) ~~No a~~Advertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall ~~not~~ be published, aired, displayed, disseminated, or distributed:

- (a) in media outlets, including social media platforms, that are used primarily by individuals under twenty-one years of age;
- (b) at events aimed at minors or where ~~27~~25% or more of the audience is reasonably expected to be under twenty-one years of age;
- (c) at any elementary, middle, and high school, or at any sports venue exclusively used for such schools;
- (d) on any college or university campus;
- (e) to any other audience where ~~27~~25% or more of the audience is presumed to be under twenty-one years of age.

~~(4)~~(5) No sports Wagering advertisements, including logos, trademarks, or brands, shall ~~not~~ be used, or licensed for use, on products, clothing, toys, games, or game equipment designed or intended for persons under twenty-one years of age.

~~(5)~~(6) No aAdvertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall ~~not~~ depict an individual who is, or appears to be, under twenty-one years of age, except live footage or images of professional athletes during sporting events on which sports wagering is permitted. Any individual under the age of twenty-one may not be depicted in any way that may be construed as the underage individual participating in or endorsing sports gaming.

~~(6)~~(7) No aAdvertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall ~~not~~ depict students, schools or colleges, or school or college settings.

~~(7)~~(1) ~~Advertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall state that patrons must be twenty-one years of age or older to participate.~~

256.06: Advertising to Other Vulnerable Persons

(1) No Sports Wagering Operator shall allow, conduct, or participate in any advertising, marketing, or branding for Sports Wagering that is aimed exclusively or primarily at groups of people that are at moderate or high risk of gambling addiction. A Sports Wagering Operator shall not intentionally use characteristics of at-risk or problem bettors to target potentially at-risk or problem bettors with advertisements.

(2) Advertising, marketing, branding, and other promotional materials published, aired, displayed, disseminated, or distributed by or on behalf of any Sports Wagering Operator shall include a link to and phone number for the Massachusetts Problem Gambling Helpline using language provided by the Department of Public Health.

(3) Such advertising, marketing, branding and other promotional materials shall not use a font, type size, location, lighting, illustration, graphic depiction or color obscuring conditions or limiting factors associated with the advertisement of such Problem Gambling Helping Information.

(4) Information regarding the Problem Gaming Helping and any other required responsible gaming information (“Responsible Gaming Messaging”) must also meet the following requirements:

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(a) For signs, direct mail marketing materials, posters and other print advertisements, the height of the font used to advertise Responsible Gaming Messaging must be the greater of:

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i. The same size as the majority of the text used in the sign, direct mail marketing material, poster or other print advertisement; or

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ii. 2% of the height or width, whichever is greater, of the sign, direct mail marketing material, poster or other print advertisement.

(b) For billboards, the height of the font used for Responsible Gaming Messaging must be at least 5% of the height or width, whichever is greater, of the face of the billboard.

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(c) For digital billboards, Responsible Gaming Messaging must be visible for the entire time the rest of the advertisement is displayed.

(d) For video and television, Responsible Gaming Messaging must be visible for either:

i. The entire time the video or television advertisement is displayed, in which case the height of the font used for Responsible Gaming Messaging must be at least 2% of the height or width, whichever is greater, of the image that will be displayed.

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ii. From the first time Sports Wagering Equipment, a Sports Wagering Facility, a Sports Wagering Area or Sports Wagering is displayed or verbally referenced, and on a dedicated screen shot visible for at least the last three (3) seconds of the video or television advertisement. If the Operator elects to utilize this option, the height of the font used for Responsible Gaming Messaging:

1. During the advertisement must be at least 2% of the height or width, whichever is greater, of the image that will be displayed.

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2. On the dedicated screen shot must be at least 8% of the height or width, whichever is greater, of the image that will be displayed.

(e) For web sites, including social media sites:

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i. Responsible Gaming Messaging must be posted in a conspicuous location on each webpage or profile page and on a gaming related advertisement posted on the webpage or profile page.

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ii. The height of the font used for Responsible Gaming Messaging must be at least the same size as the majority of the text used in the webpage or profile page.

(2)iii. For advertisements posted on the webpage or profile page, the height of the font used for Responsible Gaming Messaging must comply with the height required for signs, direct mail marketing materials, posters and other print advertisements.

256.07: Self-Excluded Persons

- (1) No Sports Wagering Operator shall allow, conduct, or participate in any advertising, marketing, or branding for sports wagering that is aimed at persons who have enrolled in a Self-Exclusion Program pursuant to 205 CMR 233.
- (2) No Sports Wagering Operator shall direct text messages or unsolicited pop-up advertisements on the internet to an individual in the Self-Exclusion Program or shall allow any employee or agent of the Sports Wagering Operator, or affiliated entity or a third party pursuant to contract, to take such actions.
- (3) All direct advertising, marketing, or promotional materials shall include a clear and conspicuous method allowing patrons to unsubscribe from future advertising, marketing, or promotional communications.

256.08: Disruption to Viewers

- (1) No Sports Wagering Operator shall allow, conduct, or participate in any advertising, marketing, or branding for Sports Wagering that obscures the game play area of a sporting event or obstructs a game in progress.
- (2) Advertisements for Sports Wagering may not be placed at a sports event with such intensity and frequency that they represent saturation of that medium or become excessive.

256.09: Endorsements

- (1) An advertisement for Sports Wagering shall not state or imply endorsement by minors ~~(other than professional athletes who may be minors)~~, collegiate athletes, schools or colleges, or school or college athletic associations.
- (2) An individual who participates in Sports Wagering in the Commonwealth under an agreement with a Sports Wagering Operator for advertising, branding or promotional purposes may not be compensated in promotional credits for additional wagers.

256.10: Records

- (1) Each Sports Wagering Operator shall retain a copy of all advertising, marketing, branding and other promotional materials intended to promote any Sports Wagering within the Commonwealth, including a log of when, how, and with whom, those materials have been published, aired, displayed, or disseminated, for six (6) years.

A Sports Wagering Operator shall also grant the Commission access to all social media platforms utilized by the licensee.

- (2) All advertising, marketing, branding, and other promotional materials related to Sports Wagering and the log described in subsection (1) shall be made available to the Commission or its agents upon request.

256.11: Enforcement

- (1) A Sports Wagering Operator shall discontinue or modify as expeditiously as possible the use of a particular advertisement, marketing, or branding material in the Commonwealth or directed to residents in this state upon receipt of written notice that the Commission has determined that the advertisement, marketing, or branding material in question does not conform to the requirements of 205 CMR 256.00 or the discontinuance or modification of which is necessary for the immediate preservation of the public peace, health safety, and welfare of the Commonwealth.

(2) A failure to adhere to the rules of 205 CMR 256.00 may be grounds for disciplinary action under ~~205 CMR 232~~ or any ~~other~~ enforcement method available to the Commission, including emergency enforcement orders to immediately cease and desist such advertising pursuant to 205 CMR 109.

(2)(3) The Commission may, in addition to, or in lieu of, any other discipline, require an Operator that violates this section 205 CR 256 to provide electronic copies of all advertising, marketing and promotional materials developed by or on behalf of the Operator to the Commission at least ten (10) business days prior to publication, distribution or airing to the public.



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 promulgation of **205 CMR 256 SPORTS WAGERING ADVERTISING**.

This regulation was promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and is authorized by G.L. c. 23N, §4. It is intended to carry out the Commission’s mandate to promulgate regulations governing the advertising of sports wagering pursuant to G.L. c. 23N, § 4(c)(ii).

This regulation is unlikely to have an impact on small businesses as it governs the behavior of Sports Wagering Operators who are not small businesses. Under 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:

This regulation is unlikely to have an impact on small businesses.

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

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

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

No standards applicable to small businesses are set forth. Provided standards are 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:

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:



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This amendment is unlikely to have any impact on the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

/s/ Carrie Torrissi
Carrie Torrissi, Deputy General Counsel

Dated: January 18, 2023

DRAFT



Massachusetts Gaming Commission



TO: Chair Cathy Judd-Stein
Commissioner Brad Hill
Commissioner Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Nakisha Skinner

FROM: Mina Makarious, Esq., Anderson & Kreiger
Caitlin Monahan, Deputy General Counsel

CC: Karen Wells, Executive Director

DATE: January 13, 2023

RE: 205 CMR 239: CONTINUING DISCLOSURE AND REPORTING OBLIGATIONS
OF SPORTS WAGERING LICENSEES

Enclosed for the Commission's review is a proposed regulation, 205 CMR 239, governing the required disclosure and reporting obligations of sports wagering licensees. The regulation is intended to capture many of the record keeping and reporting obligations in other portions of 205 CMR 200 *et seq.*

The regulation is structured in the following way:

- 239.01 provides that the Commission will have the general ability to access and inspect the premises of a Category 1 or 2 Sports Wagering Operator. It also requires the Operator to maintain complete and accurate records of all transactions. Finally, it permits the Commission to request the production of records following the same process as in 205 CMR 142.00 and 205 CMR 241 (which is also being presented to the Commission).
- 239.02 sets a basic rule that each Operator must identify its fiscal year for record keeping purposes.
- 239.03 identifies the records to be filed with the Commission. These include, among other things, reports on hiring demographics, any amendments to House Rules and Internal Controls, notices of any declared events of default on debts, and the Operator's annual problem gaming plan. Operators must also provide the Commission with notice of any actual or suspected violation of G.L. c. 23N or 205 CMR or if any person on the voluntary self-exclusion list is found to have engaged in Sports Wagering.
- 239.04 identifies information that must be retained by an Operator and made available to the Commission upon request. This includes a variety of corporate documents and records of corporate transactions Operators should be expected to maintain, securities



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filings, tax returns, a system of financial accounting, and information regarding patron loyalty programs.

- 239.05 requires the submittal of quarterly reports by the Operator to the Commission on certain financial matters.
- 239.06 requires Operators to perform an annual audit of financial records and explains the basic requirements for such an audit.
- 239.07 provides for the Commission's annual audit of the Operator.



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205 CMR 239: CONTINUING DISCLOSURE AND REPORTING OBLIGATIONS OF SPORTS WAGERING LICENSEES

Section

- 239.01 Access to and Maintenance and Production of Operator Records
- 239.02 Fiscal Year
- 239.03 Reports and Information to be Filed with the Commission
- 239.04 Reports and Information to Be Compiled and Maintained by the Operator
- 239.05 Quarterly Reports
- 239.06 Annual Audit and Other Reports
- 239.07 Audit of Operator Operations by Commission

239.01 Access to and Maintenance and Production of Operator Records

- (1) The Commission shall have access to, and may inspect, the premises of a Category 1 Sports Wagering License or Category 2 Sports Wagering License Operator.
- (2) An Operator shall maintain complete, accurate, and legible records of all transactions pertaining to the revenues and costs associated with its Sports Wagering operation, including those required in accordance with 205 CMR. General accounting records shall be maintained on a double entry system of accounting with transactions recorded on the accrual basis. Detailed, supporting, subsidiary records sufficient to meet the requirements of 205 CMR shall also be maintained.
- (3) The Commission may request the production of records of an Operator in accordance with the provisions of 205 CMR 142.00 and 205 CMR 241.

239.02 Fiscal Year

The Operator shall establish a fiscal year for accounting purposes and shall advise the Commission of such.

239.03 Reports and Information to be Filed with the Commission

- (1) The following reports and information shall be filed with the Commission, or its designee, in the manner and time provided:
 - (a) A detailed annual, and at other times as directed by the Commission, statistical report on the number, job titles, benefits, race, gender, veteran status, and salaries of employees hired and retained in employment in the Commonwealth by the Operator;
 - (b) A detailed annual, and at other times as directed by the Commission, statistical report on the total dollar amounts contracted with and actually paid to minority business enterprises, women business enterprises and veteran business enterprises by the Operator. The annual statistical report shall also identify the

amounts so contracted as a percentage of the total dollar amounts contracted with and actually paid to all firms;

- (c) On an annual basis, and at other times as directed by the Commission, a report explicitly stating the Operator's progress on meeting each of the stated goals and stipulations put forth in its application for a Sports Wagering Operator License;
 - (d) Any Reports prescribed by the Commission relative to Occupational Licenses;
 - (e) Quarterly reports in accordance with 205 CMR 239.05;
 - (f) Documents and other materials required to be submitted in accordance with the terms of the Sports Wagering Operator License;
 - (g) An Operator's House Rules, system of internal controls, amendments thereto, and any documents or information required to be submitted in accordance with the approved system of internal controls;
 - (h) Any declared event of default related to any debt obligation maintained by the Operator, affiliate, holding company or intermediary company thereof shall be immediately reported to the Commission, in writing, along with any plans to address or cure such default;
 - (i) A bi-monthly Disbursement Report relative to vendors licensed or registered in accordance with 205 CMR 234, which shall contain the same information as is required in a Disbursement Report filed pursuant to 205 CMR 138.06(2); and
 - (j) An annual problem gaming plan in accordance with M.G.L. c. 23N, § 4(2)(vii).
- (2) Promptly upon discovery, the Operator shall notify the Commission or its designees assigned to the Operator of any violation, or suspected violation, of M.G.L. c. 23N, 205 CMR, or any Sports Wagering related law and file any requested written report. In accordance with M.G.L. c. 23N, § 12(a)(i), "suspected violations" shall include irregularities in volume or changes in odds that could signal suspicious activities.
 - (3) An Operator shall promptly notify the Commission or its designees assigned to the Operator if an individual on the voluntary self-exclusion list established in accordance with 205 CMR 233.00 is found to have engaged in Sports Wagering.
 - (4) Daily, monthly, and annual Adjusted Gross Sports Wagering Receipts and Adjusted Gross Fantasy Sports Receipts remittance and reconciliation reports as required in accordance with 205 CMR 240.00.
 - (5) An underage person report containing the information required in accordance with 205 CMR 250.05.

- (6) A quarterly report, covering all complimentary services offered or engaged in by the Operator during the immediately preceding quarter. The reports shall identify regulated complimentary services or items including, but not limited to, food and beverage, hotel and travel accommodations, and promotional Sports Wagering credits. The reports shall be aggregated by, at a minimum, the costs of the complimentary services or items, and the number of people who received each service or item for the quarter. The report shall also document any services or items valued in excess of \$2,000 that were provided to patrons, including detailed reasons as to why they were provided. Valuation shall be performed in accordance with [M.G.L. c. 23K, § 28\(c\)](#).
- (7) Counter check information maintained by the Operator, which at a minimum shall include the information described in 205 CMR 138.43(2)(1) through (n).

239.04: Reports and Information to Be Compiled and Maintained by the Operator

The following reports and information shall be compiled and maintained by the Operator, or where applicable the Operator's holding company, intermediary company, qualifying subsidiary, or entity qualifier thereof, in the manner provided as follows or as required by the governing body responsible for the oversight of the subject information, and shall be made available and provided upon request by the Commission, or its designee:

- (1) Up to date records regarding the business structure, capital structure, and controlling interest of the Operator, where applicable, and the Operator's holding company, intermediary company, qualifying subsidiary, or entity qualifier thereof including, at a minimum:
 - (a) Certified copies of incorporation and formation documents and any amendments thereto;
 - (b) By-laws, shareholders agreements, governing and/or operating agreements or documents, partnership agreement, intercompany transactions, joint venture agreements, merger and acquisition agreements, and other relevant corporate documents
 - (c) Current listing of officers, directors, members, partners;
 - (d) Minutes of all meetings of shareholders;
 - (e) Detailed records regarding all record and beneficial owners of any class of non-publicly traded securities, including both equity and debt securities, issued by the Operator, its holding company, intermediary company, qualifying subsidiary or entity qualifier thereof, including the names and addresses of record and beneficial owners of such equity or debt securities, date(s) acquired and the number of equity securities held or face amount of debt securities held, as applicable;
 - (f) Detailed records regarding all record and beneficial owners of 5% or more of any class of publicly traded securities, including both equity and debt securities, issued

by the Operator, its holding company, intermediary company, qualifying subsidiary or entity qualifier thereof, including the names and addresses of record and beneficial owners of such equity or debt securities held in street name or other name, date(s) acquired and the number of equity securities held or face amount of debt securities held, as applicable;

- (g) Detailed records regarding distributions to equity holders holding 5% or more of the entity;
 - (h) Detailed records regarding all remuneration paid to officers, directors, partners and members;
 - (i) (for the Operator only) Detailed records regarding all capital contributions;
 - (j) (for the Operator only) Detailed records regarding any equity transfers;
 - (k) Essential details of any debt obligations including loans, covenants, borrowings, installment contracts, guarantees, leases, or any other debt; and
 - (l) Any other records as the Commission deems appropriate.
- (2) Copies of any securities filings submitted to federal, state, or other domestic or foreign securities regulatory authorities, regarding any of the securities, either in existence or proposed, including, but not limited to, United States Securities and Exchange Commission forms S-1,8-K, 10-Q and 10-K, proxy or information statements and all registration statements filed by the Operator, or holding company, intermediary company, qualifying subsidiary and entity qualifier thereof.
 - (3) Copies of any United States Securities and Exchange Commission Schedules 13D or 13G served upon the Operator, or holding company, intermediary company, qualifying subsidiary and entity qualifier thereof.
 - (4) Copies of the federal and state tax returns and any related forms filed by the Operator, and its holding company, intermediary company, qualifying subsidiary or entity qualifier thereof.
 - (5) The system of financial accounting, in accordance with generally accepted accounting principles, to be utilized by the Operator designed to ensure the accurate recording and reporting its assets, liabilities, equity, revenue and expenses. The Operator's system of financial accounting shall provide a level of detail so as to allow it to accurately compute Adjusted Gross Sports Wagering Receipts, and to report the Operator's drop, win, and hold percentage for each form of Sports Wagering activity, the value of complimentary goods or services and promotional credits issued during the accounting period, and any other information necessary to allow the Commission to understand the Operator's results of operations. The Operator shall maintain detailed information and documentation to support all amounts reported to the Commission as being the Operator's assets, liabilities, equity, revenue and expenses.
 - (6) Data derived from the Operator's player card/rewards card/loyalty program, player tracking

software, sports wagering equipment or other similar information systems including:

- (a) The amount of money spent and lost on Sports Wagering (excluding the value of promotional credits wagered, but including any amounts that were subject to discretionary discounting for marketing or other similar purposes) by patrons who have been issued a player card or rewards card or sports wagering account, aggregated by, at a minimum, the patron's age, gender and home zip code provided by the patron and compiled on an annual basis or as otherwise directed by the Commission; and
 - (b) Information, compiled by year, on player characteristics for patrons of the Operator including, but not limited to, gender, age and region of residence, player behavior including, but not limited to, frequency of wagering, amounts wagered and characteristics of sporting events and wager categories wagered on.
- (7) An annual business plan for the Operator, which will include financial projections in format as prescribed by the Commission no later than 30 days prior to the commencement of the fiscal year.
 - (8) A compliance plan and any amendments thereto, for the Operator and its holding company or intermediary company outlining the practices and protocols implemented, or to be implemented, designed to ensure compliance with all applicable federal or state laws.
 - (9) Copies of the minutes of all board of directors or equivalent governing authority meetings and committee meetings, for the Operator or holding company or intermediary company thereof.

239.05: Quarterly Reports

- (1) On a quarterly basis, the Operator shall create and file with the Commission a report that provides a continuing view of the Operator's financial position including key performance measures, and narrative commentary on operating results. The quarterly report shall be attested to by any two of the following: the Chief Executive Officer, Chief Financial Officer, Treasurer, Financial Director, Controller, or their functional equivalent.
- (2) The quarterly report required in accordance with 205 CMR 239.06(1) shall be accompanied by a statement attested to by the Operator's Chief Financial Officer, or their functional equivalent, that the Operator satisfies the following:
 - (a) It has maintained for the previous quarter, and has the ability to maintain for the upcoming quarter, a gaming bankroll or equivalent provisions adequate to pay winning wagers to Sports Wagering patrons when due.
 - (b) It has paid in the previous quarter and has the ability to pay when due all local, state and federal taxes, including the tax on Adjusted Sports Wagering Receipts imposed and any fees imposed under M.G.L. c. 23N or 205 CMR.
 - (c) It has the ability to pay, exchange, refinance or extend debts, including long-term

and short-term principal and interest and capital lease obligations, which will mature or otherwise come due and payable during the license term, or to otherwise manage such debts and any default with respect to such debts.

239.06: Annual Audit and Other Reports

- (1) On an annual basis an Operator shall, at its own expense, cause an audit to be prepared by an independent certified public accountant of its financial statements relevant to the operation of its Massachusetts Sports Wagering Operations. The Operator may satisfy this requirement by submission of the audit of the consolidated financial statement, including applicable notes, of the Operator's holding company or intermediary company provided that such audit is accompanied by a supplemental information, appendix, or other financial information section specific to the Operator which includes an audited financial statement containing, at a minimum, a balance sheet, income statement, and a statement of cash flows for the Operator. In either event, the independent certified public accountant shall attest to the financial condition of the Operator, disclose whether the accounts, records and control procedures examined are maintained by the Operator as required by M.G.L. c. 23N and 205 CMR, and opine as to whether there are material weaknesses in the Operator's system of internal controls.
- (2) In the event that the audit makes recommendations to improve the system of internal controls, or to increase the Operator's level of compliance, the Operator's Chief Financial Officer shall respond, in writing, to the recommendations of the independent certified public accountant and provide the Commission with a copy of its response.
- (3) To ensure the independence of the annual audit, at least every five years an Operator, whose holding company or intermediary company is not publicly traded, shall rotate the lead (or coordinating) audit partner having primary responsibility for the audit, and the audit partner responsible for reviewing the audit. For an Operator, whose holding company or intermediary company is publicly traded, lead (or coordinating) audit partner rotation shall comply with the requirements of federal law, including the requirements of the United States Securities and Exchange Commission and/or the Public Company Accounting Oversight Board.
- (3) In the event the annual audited financial statements differ from financial statements maintained by the Operator throughout the year, the Operator shall provide a summary of these differences as part of the annual audit.
- (4) The annual audit and associated statements required in accordance with 205 CMR 239.07(1) shall be filed with the Commission within three months following the end of the quarter following the end of the Operator's fiscal year.
- (5) In cases where an Operator's parent or holding company is not publicly traded, in the event the Operator's independent certified public accountant shall resign or be

removed as the Operator's principal accountant or auditor, the Operator shall submit a written report to the Commission within 20 days of such resignation or removal, signed by its Chief Financial Officer and Chair of its Audit Committee, outlining the cause or nature of the resignation or removal, stating whether the resignation or removal was related to material differences between the parties as to financial statement presentation issues, disclosures, or the adequacy of the Operator's system of internal accounting control and, if so, a complete and detailed description of the differences for consideration by the Commission. The Operator shall submit as an exhibit to this report a letter from the former independent certified public accountant stating whether they agree with the statements made by the Operator in the report submitted to the Commission.

- (6) In cases where an Operator's parent or holding company is publicly traded, the Operator shall file with the Commission copies of such information and documents as are required to be filed with the United States Securities and Exchange Commission and/or the Public Company Accounting Oversight Board upon the resignation or removal of the publicly traded holding company's independent certified public accountant.
- (7) To the extent possible, any adjustments resulting from the annual audit required in accordance with 205 CMR 239.07 shall be recorded in the accounting records of the year to which the adjustment relates. In the event the adjustments were not reflected in the Operator's quarterly report for the fourth quarter and the Commission concludes the adjustments are significant, a revised quarterly report for the fourth quarter may be required from the Operator. The revised filing shall be due within 30 calendar days after notification to the Operator, unless an extension is granted by the Commission.

239.07: Audit of Operator Operations by Commission

The Commission shall audit on an annual basis, and at other times the Commission, or the Bureau, determines necessary the accounts, programs, activities, and functions of an Operator or any aspect of Sports Wagering Operation and compliance with any provision of the Operator's system of internal controls. To conduct the audit, authorized officers and employees of the Commission shall be given access by the Operator to such accounts at reasonable times and may require the production of books, documents, vouchers and other records relating to any matter within the scope of the audit; provided however, that an Operator's tax returns will not be audited by the Commission. All audits shall be conducted in accordance with generally accepted auditing standards established by the American Institute of Certified Public Accountants and the standards established by the Public Company Accounting Oversight Board. In any audit report of the accounts, funds, programs, activities and functions of an Operator issued by the Commission containing adverse or critical audit results, the Commission may require a response, in writing, to the audit results. Such a response shall be forwarded to the Commission within 15 days of notification by the Commission. Where possible, efforts will be made not to audit areas that were the subject of, and satisfactorily addressed by, the annual audit required in accordance with 205 CMR 239.07.



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 of **205 CMR 239 CONTINUING DISCLOSURE AND REPORTING OBLIGATIONS OF SPORTS WAGERING LICENSEES.**

This regulation is being promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and is primarily governed by G.L. c. 23N, § 4. It sets forth the required disclosure and reporting obligations of sports wagering operators to the Commission.

The proposed 205 CMR 239 applies to potential sports wagering operators and the Commission. Accordingly, this regulation is unlikely to have an impact on small businesses. Under 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:

This regulation is unlikely to have an impact on small businesses.

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

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

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

No standards applicable to small businesses are set forth.

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 is unlikely to have any impact on the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission

By:

/s/ Caitlin W. Monahan
Caitlin W. Monahan, Deputy General Counsel

Dated: January 13, 2023



Massachusetts Gaming Commission



TO: Chair Cathy Judd-Stein
Commissioner Brad Hill
Commissioner Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Nakisha Skinner

FROM: Mina Makarious, Esq., Anderson & Kreiger
Caitlin Monahan, Deputy General Counsel

CC: Karen Wells, Executive Director

DATE: January 13, 2023

RE: 205 CMR 241: Surveillance and Monitoring

Enclosed for the Commission's review is a proposed set of regulations governing the surveillance and monitoring of sports wagering areas and sports wagering facilities. These regulations import a gaming licensee's surveillance obligations with respect to a gaming establishment, and the Commission's authority to conduct administrative monitoring and inspections of gaming establishments, to sports wagering operators.



Massachusetts Gaming Commission

1/12/2023 Draft

205 CMR 241.00: SURVEILLANCE AND MONITORING

Section

241.01: Surveillance of the Sports Wagering Area and Sports Wagering Facility

241.02: Regulatory Monitoring and Inspections

241.01: Surveillance of the Sports Wagering Area and Sports Wagering Facility

A Sports Wagering Operator shall have the same responsibilities relative to the surveillance of the Sports Wagering Area or Sports Wagering Facility as gaming licensees have relative to a gaming establishment pursuant to 205 CMR 141.00.

241.02: Regulatory Monitoring and Inspections

The Commission shall have the same authority relative to the administrative monitoring and inspections of Sports Wagering Areas and Sports Wagering Facilities as it does with respect to gaming establishments pursuant to 205 CMR 142.00.



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 promulgation of **205 CMR 241 SURVEILLANCE AND MONITORING**.

This regulation is being promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and is primarily governed by G.L. c. 23N, § 4. It sets forth the requirement that sports wagering operators monitor physical locations in which sports wagering is offered, and permit administrative monitoring and inspection of the same to the Commission.

The proposed 205 CMR 241 applies to potential sports wagering operators and the Commission. Accordingly, this regulation is unlikely to have an impact on small businesses. Under 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:

This regulation is unlikely to have an impact on small businesses.

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

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

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

No standards applicable to small businesses are set forth.

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 is unlikely to have any impact on the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission

By:

/s/ Caitlin W. Monahan
Caitlin W. Monahan, Deputy General Counsel

Dated: January 13, 2023



Massachusetts Gaming Commission



Legal Division

TO: Cathy Judd-Stein, Chair
Eileen O'Brien, Commissioner
Brad Hill, Commissioner
Nakisha Skinner, Commissioner
Jordan Maynard, Commissioner

FROM: Carrie Torrisi, Deputy General Counsel
Annie Lee, Anderson & Kreiger
David Mackey, Anderson & Kreiger

DATE: January 13, 2023

RE: 205 CMR 255: Play Management

Enclosed for the Commission's review is a proposed set of regulations requiring sports wagering operators to offer play management programs to patrons.

Play management programs must offer the following options:

- Single wager limits;
- Daily, weekly or monthly aggregate wager limits;
- Net loss limits.
- Single deposit limits;
- Account limits; and
- Daily, weekly or monthly aggregate deposit limits.

These limits prevent individuals from sports wagering in excess of their specified limits by requiring operators to reject wagers and deposits that go beyond those limits, and prohibiting patrons from collecting winnings or recovering losses resulting from sports wagering in violation of those limits. To help patrons keep track of their limits, operators must also provide



Massachusetts Gaming Commission

notifications to patrons of approaching limits, unless the patron affirmatively opts out of receiving such notifications.

Patrons are offered multiple opportunities to enroll in play management programs. Like PlayMyWay, patrons are prompted to enroll when they initially access a platform or kiosk, provided monthly reminders to enroll, and even when they decline enrollment, are able to access an enrollment link maintained on the operator's platform or kiosk at all times.

Patrons also retain the ability to modify their limits and unenroll from Play Management. Where patrons modify their limits to be more restrictive, the modification is immediately effective. Where patrons modify their limits to be less restrictive or unenroll from Play Management, the modification and unenrollment is only effective after any applicable time requirements in their limit is met and only after they reaffirm the modification or unenrollment.

205 CMR 255: PLAY MANAGEMENT

Section

- 255.01: Scope and Purpose
- 255.02: Limitations
- 255.03: Enrollment
- 255.04: Notifications of Approaching Limit
- 255.05: Responsibilities of the Sports Wagering Operator
- 255.06: Collection of Debts

255.01: Scope and Purpose

Sports Wagering Operators operating Sports Wagering Platforms and Sports Wagering Kiosks shall maintain play management programs which allow individuals to designate themselves as subject to limitations regarding Sports Wagering. 205 CMR 255.00 shall govern the procedures and protocols relative to these play management programs, which are intended to offer individuals a means to restrict gambling behavior and to increase informed player choice.

255.02: Limitations

(1) Individuals who designate themselves as subject to limitations regarding Sports Wagering shall select one or more of the following specific activities subject to the limitations:

- (a) placing a Wager over a specified dollar amount;
- (b) placing a Wager once an individual has, during a day, week or month, Wagered over a specified cumulative dollar amount;
- (c) placing a Wager once an individual has, during a day, week or month, incurred a net loss over a specified dollar amount;
- (d) depositing an amount into the individual's Sports Wagering Account over a specified dollar amount;
- (e) depositing an amount into the individual's Sports Wagering Account when the individual's Sports Wagering Account exceeds a specified balance; or
- (f) depositing an amount into the individual's Sports Wagering Account once the individual has, during a day, week or month, deposited over a specified cumulative amount into the individual's Sports Wagering Account.

(2) If individuals choose to be subject to limitations regarding Sports Wagering, they must affirmatively designate themselves as such. No default limitations shall be imposed by Sports Wagering Operators.

(3) Individuals who designate themselves as subject to limitations regarding Sports Wagering shall not collect any winnings or recover any losses resulting from Sports Wagering in violation of the limitations.

255.03: Enrollment

- (1) When an individual seeks to enroll onto a Sports Wagering Platform or Sports Wagering Kiosk, a Sports Wagering Operator shall conspicuously display to the individual a message describing the available limitations for Sports Wagering, and offering the individual the opportunity to designate themselves as subject to one more of those limitations. In the event the individual chooses to decline that opportunity, the individual shall be required to affirmatively state that choice to the Sports Wagering Operator.
- (2) On a monthly basis as measured from the time of enrollment onto the Sports Wagering Platform or Sports Wagering Kiosk, if an individual has not designated themselves as subject to limitations regarding Sports Wagering, the Sports Wagering Operator shall conspicuously display a message offering individuals the opportunity to designate themselves as subject to limitations regarding Sports Wagering. In the event the individual chooses to decline that opportunity, the individual shall be required to affirmatively state that choice to the Sports Wagering Operator.
- (3) Sports Wagering Operators shall maintain at all times a link prominently placed on the Sports Wagering Platform or Sports Wagering Kiosk on which individuals may designate themselves as subject to limitations regarding Sports Wagering.
- (4) Limitations shall become immediately effective upon designation.
- (5) Individuals shall be permitted to modify or unenroll from their selected limitations regarding Sports Wagering. If individuals modify the limitations to be more restrictive, the limitations shall become immediately effective. If individuals modify the limitations to be less restrictive or unenroll from the limitations, the new limitation or unenrollment shall not take effect until the next business day after the time period specified pursuant to 205 CMR 255.02(1)(b)-(c) and (f) have expired and the individual reaffirms the modification or unenrollment.

255.04: Notifications of Approaching Limit

- (1) Subject to 205 CMR 255.04(4), individuals who designate themselves as subject to limitations regarding Sports Wagering shall receive a notification of an approaching limit when:
 - (a) The individual has Wagered 75% of the cumulative dollar amount specified pursuant to 205 CMR 255.02(1)(b) during the period of time specified pursuant to 205 CMR 255.02(1)(b);
 - (b) The individual has incurred 75% of the net loss dollar amount specified pursuant to 205 CMR 255.02(1)(c) during the period of time specified pursuant to 205 CMR 255.02(1)(c);
 - (c) The individual's Sports Wagering Account has reached 75% of the balance specified pursuant to 205 CMR 255.02(1)(e); and
 - (d) The individual has deposited 75% of the cumulative dollar amount specified pursuant to 205 CMR 255.02(1)(f) into the individual's Sports Wagering Account during the period of time specified pursuant to 205 CMR 255.02(1)(f).

(2) These notifications of approaching limits shall appear only the first time the percentage level is reached during the period of time specified pursuant to 205 CMR 255.02(1)(b)-(c) and (f) even if the same percentage level is reached on multiple occasions due to the individual's wins and losses.

(3) The Sports Wagering Operator shall not accept additional Wagers or permit additional deposits until the individual has acknowledged the notification of approaching limits.

(4) An individual may, upon designating themselves as subject to one or more limitations, be given the opportunity to decline receiving notification of approaching limits under 205 CMR 255.04(1).

255.05: Responsibilities of the Sports Wagering Operator

A Sports Wagering Operator shall have the same responsibilities relative to the play management program as gaming licensees and Sports Wagering Operators have relative to the administration of the voluntary self-exclusion list pursuant to 205 CMR 133.06(7)(b) and 205 CMR 233.06(4)-(8), respectively, including the obligation to submit a written policy for compliance with 205 CMR 255.00. Individuals who designate themselves to the Sports Wagering Operator as subject to limitations regarding Sports Wagering shall have the same rights as those provided under 205 CMR 133.06(7)(b).

A Sports Wagering Operator shall also have the following responsibilities relative to the administration of the play management program:

(1) A Sports Wagering Operator shall not accept a Sports Wager over the dollar amount specified pursuant to 205 CMR 255.02(1)(a);

(2) A Sports Wagering Operator shall not accept a Sports Wager once an individual has Wagered during the period of time specified pursuant to 205 CMR 255.02(1)(b) the cumulative dollar amount specified pursuant to 205 CMR 255.02(1)(b);

(3) A Sports Operator shall not accept a Sports Wager once an individual has during the period of time specified pursuant to 205 CMR 255.02(1)(c) incurred a net loss over the dollar amount specified pursuant to 205 CMR 255.02(1)(c);

(4) A Sports Wagering Operator shall not accept a deposit over the dollar amount specified pursuant to 205 CMR 255.02(1)(d);

(5) A Sports Wagering Operator shall not accept a deposit when the individual's Sports Wagering Account exceeds the balance specified pursuant to 205 CMR 255.02(1)(e);

(6) A Sports Wagering Operator shall not accept a deposit once the individual has during the period of time specified pursuant to 205 CMR 255.02(1)(f) deposited the cumulative amount specified pursuant to 205 CMR 255.02(1)(f);

(7) A Sports Wagering Operator shall require an individual to acknowledge the following prior to being designated as subject to limitations regarding Sports Wagering:

- (a) That the individual shall not collect any winnings or recover any losses resulting from Sports Wagering in violation of the limitation in accordance with 205 CMR 255.02(3); and
- (b) That once the individual is designated as subject to limitations regarding Sports Wagering, an individual's attempted Sports Wager or deposit into the individual's Sports Wagering Account may be rejected or, if placed, may be voided or cancelled by the Sports Wagering Operator.

(8) A Sports Wagering Operator shall produce monthly reports containing data and other information regarding the play management program, as specified and requested by the Commission; and

(9) A Sports Wagering Operator shall maintain data regarding the play management program for a period of at least 24 months. A Sports Wagering Operator shall make such data available upon request to the Commission.

255.06: Collection of Debts

Nothing in 205 CMR 255.00 shall be construed to prohibit a Sports Wagering Operator from seeking payment of a debt from an individual who is designated to the Sports Wagering Operator as subject to notifications or limitations regarding Sports Wagering, but who violates the terms of the limitation.



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 promulgation of **205 CMR 255 PLAY MANAGEMENT**.

This regulation is being promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and is primarily governed by G.L. c. 23N, § 4. It sets forth the requirement that sports wagering operators offer play management programs to patrons engaging in sports betting on mobile applications and digital platforms in the Commonwealth.

The proposed 205 CMR 255 applies to potential sports wagering operators and the Commission. Accordingly, this regulation is unlikely to have an impact on small businesses. Under 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:

This regulation is unlikely to have an impact on small businesses.

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

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

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

No standards applicable to small businesses are set forth.

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 is unlikely to have any impact on the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

/s/ Carrie Torrissi
Carrie Torrissi, Deputy General Counsel

Dated: January 13, 2023

DRAFT



Massachusetts Gaming Commission



Legal Division

TO: Cathy Judd-Stein, Chair
Eileen O'Brien, Commissioner
Brad Hill, Commissioner
Nakisha Skinner, Commissioner
Jordan Maynard, Commissioner

FROM: Carrie Torrisi, Deputy General Counsel
Annie Lee, Anderson & Kreiger
David Mackey, Anderson & Kreiger

DATE: January 13, 2023

RE: 205 CMR 254: Temporary Prohibitions from Sports Wagering

Enclosed for the Commission's review is a proposed amendment to 205 CMR 254: Temporary Prohibitions from Sports Wagering. This regulation was approved by the Commission on December 15, 2022, is currently in effect by emergency and making its way through the formal promulgation process, and will be returning to the Commission on February 9, 2023, for final vote.

The current version of the regulation requires notification to patrons when their selected temporary prohibition period is set to expire. Given recent conversations with the applicants, we are proposing amending the regulation to make this notification optional.



Massachusetts Gaming Commission

205 CMR 254: TEMPORARY PROHIBITION FROM SPORTS WAGERING

Section

- 254.01: Scope and Purpose
- 254.02: Temporary Prohibition
- 254.03: Duration of Temporary Prohibition and Conclusion of Temporary Prohibition
- 254.04: Responsibilities of the Sports Wagering Operator
- 254.05: Sanctions Against a Sports Wagering Operator
- 254.06: Collection of Debts

254.01: Scope and Purpose

As an alternative to voluntary self-exclusion as described in 205 CMR 233.00, Sports Wagering Operators shall allow individuals to designate themselves as temporarily prohibited from Sports Wagering. 205 CMR 254.00 shall govern the procedures and protocols relative to individuals' designation of themselves as temporarily prohibited from Sports Wagering. Designation is intended to offer individuals one means to help address potential problem gambling behavior, where individuals have not yet determined whether they may benefit from voluntary self-exclusion as described in 205 CMR 233.00.

254.02: Temporary Prohibition

(1) Individuals who designate themselves to a Sports Wagering Operator as temporarily prohibited from Sports Wagering shall be prohibited from accessing the individual's Sports Wagering Account maintained on the Sports Wagering Operator's Sports Wagering Platform for the temporary prohibition period specified in 205 CMR 254.03(1). Provided, however, that employees of a Sports Wagering Operator who designate themselves to the Sports Wagering Operator as temporarily prohibited from Sports Wagering may engage in Sports Wagering solely for the purposes of performing the employees' job functions.

(2) Individuals who designate themselves as temporarily prohibited from Sports Wagering shall not collect any winnings or recover any losses resulting from Sports Wagering in violation of the temporary prohibition.

(3) Upon an individual's initial enrollment onto a Sports Wagering Platform, a Sports Wagering Operator shall conspicuously display a message offering an individual the opportunity to designate themselves as temporarily prohibited from Sports Wagering. A Sports Wagering Operator shall require an individual to acknowledge the following prior to being designated as temporarily prohibited from Sports Wagering:

(a) That the individual will not access the individual's Sports Wagering Account maintained on the Sports Wagering Operator's Sports Wagering Platform in accordance with 205 CMR 254.02(1);

(b) That the individual shall not collect any winnings or recover any losses resulting from Sports Wagering in violation of the temporary prohibition in accordance with 205 CMR 254.02(2);

- (c) That once the individual is designated as temporarily prohibited from Sports Wagering, an individual's attempted Sports Wager may be rejected or, if placed, may be voided or cancelled by the Sports Wagering Operator.
- (4) If an individual elects to designate themselves as temporarily prohibited from Sports Wagering, the temporary prohibition shall become immediately effective.
- (5) Sports Wagering Operators shall maintain at all times a link prominently placed on the Sports Wagering Operator's Sports Wagering Platform on which individuals may designate themselves as temporarily prohibited from Sports Wagering.
- (6) If the Sports Wagering Operator utilizes an internal management system to track individuals temporarily prohibited from Sports Wagering, the Sports Wagering Operator shall update that system at least every 24 hours with the names of individuals designated as temporarily prohibited from Sports Wagering, or individuals who are no longer designated as temporarily prohibited from Sports Wagering. Such system shall notify the Sports Wagering Operator's marketing and communications departments so as to prevent the further marketing and communication of Sports Wagering material to individuals designated as temporarily prohibited from Sports Wagering.

254.03: Duration of Temporary Prohibition and Conclusion of Temporary Prohibition

- (1) An individual shall select a temporary prohibition period of 72 hours, 1 week, 2 weeks, 3 weeks or 4 weeks.
- (2) An individual may elect to renew the temporary prohibition at any time by informing the Sports Wagering Operator of the individual's desire to renew the temporary prohibition period. There shall be no limitations regarding the number of times an individual is permitted to renew the temporary prohibition period.
- (3) ~~An individual shall select whether the individual will receive advance notification of the expiration of the temporary prohibition period prior to its expiration. If an individual elects to receive such notification, the Sports Wagering Operator shall notify the individual when the temporary prohibition will expire 24 hours prior to the expiration of the 72 hour or 1 week temporary prohibition period, or 72 hours prior to the expiration of the 2 week, 3 week or 4 week temporary prohibition period, the Sports Wagering Operator shall notify the individual when the temporary prohibition will expire.~~ The notification shall also provide the individual instructions on how to renew the temporary prohibition, and how to apply to have the individual's name placed on the voluntary self-exclusion list in accordance with 205 CMR 233.02(2).
- (4) Upon conclusion of the temporary prohibition, the Sports Wagering Operator shall notify the individual that the temporary prohibition has concluded. The Sports Wagering Operator shall not accept Wagers from the individual until the individual has acknowledged the notification of the conclusion of the temporary prohibition. The notification shall provide the individual instructions on how to renew the temporary prohibition period, and how to apply to have the individual's name placed on the voluntary self-exclusion list in accordance with 205 CMR 233.02(2).

254.04: Responsibilities of the Sports Wagering Operator

A Sports Wagering Operator shall have the same responsibilities relative to the administration of the temporary prohibition from Sports Wagering program as gaming licensees and Sports Wagering Operators have relative to the administration of the voluntary self-exclusion list pursuant to 205 CMR 133.06(3)-(6) and 7(b) and 205 CMR 233.06(4)-(8), respectively, including the obligation to submit a written policy for compliance with 205 CMR 254.00. Individuals who designate themselves to the Sports Wagering Operator as temporarily prohibited from Sports Wagering shall have the same rights as those provided under 205 CMR 133.06(7)(b). A Sports Wagering Operator shall also not accept any Sports Wager from an individual who designates themselves to the Sports Wagering Operator as temporarily prohibited from placing a Wager on the Sports Wagering Platform.

254.05: Sanctions Against a Sports Wagering Operator

- (1) Grounds for Action. A Sports Wagering Operator license may be conditioned, suspended, or revoked, or a Sports Wagering Operator assessed a civil administrative penalty if it is determined that a Sports Wagering Operator has:
 - (a) knowingly or recklessly failed to carry out the Sports Wagering Operator's responsibilities as set forth in 205 CMR 254.04. Provided, it shall not be deemed a knowing or reckless failure if an individual designated to the Sports Wagering Operator as temporarily prohibited from Sports Wagering shielded the individual's identity or otherwise attempted to avoid identification while present on the Sports Wagering Platform; or
 - (b) failed to abide by any provision of 205 CMR 254.00 or a Sports Wagering Operator's approved written policy for compliance with the temporary prohibition from Sports Wagering program pursuant to 205 CMR 254.00. Provided, a Sports Wagering Operator shall be deemed to have marketed to an individual designated to the Sports Wagering Operator as temporarily prohibited from Sports Wagering only if marketing materials are sent directly to an address, email address, telephone number, or other contact identified by individuals on their designation form.
- (2) Finding and Decision. If the bureau finds that a Sports Wagering Operator has violated a provision of 205 CMR 254.04(1), it may issue a decision or notice in accordance with 205 CMR 133.07(2).
- (3) Civil Administrative Penalties. The Commission may assess a civil administrative penalty on a Sports Wagering Operator in accordance with M.G.L. c. 23N, § 16 for a violation of 205 CMR 254.04(1).
- (4) Review of Decision. A recommendation that a Sports Wagering Operator license be suspended or revoked shall proceed in accordance with the procedures set out in 205 CMR 133.07(4).

254.06: Collection of Debts

Nothing in 205 CMR 254.00 shall be construed to prohibit a Sports Wagering Operator from seeking payment of a debt from an individual who is designated to the Sports Wagering Operator

as temporarily prohibited from Sports Wagering, but who violates the terms of the temporary prohibition.



TO: Chair Cathy Judd-Stein
Commissioner Brad Hill
Commissioner Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Nakisha Skinner

FROM: Mina Makarious, Esq., Anderson & Kreiger
Caitlin Monahan, Deputy General Counsel

CC: Karen Wells, Executive Director

DATE: January 13, 2023

RE: 205 CMR 213: Withdrawal of an Application

Enclosed for the Commission's review is a proposed 205 CMR 213: Withdrawal of an Application. The regulation is based on 205 CMR 111.05, governing the withdrawal of RFA-1 gaming applications. Section 213 requires license applicants, qualifiers, registrants, or others whose applications have been set for a hearing or other proceeding to obtain leave of the Commission to withdraw their applications. It also allows the Commission to put conditions on such withdrawals. Other applicants may withdraw at any time.



Massachusetts Gaming Commission

**MASSACHUSETTS GAMING COMMISSION
PROPOSED REGULATIONS AT 205 CMR 213
WITHDRAWAL OF APPLICATIONS
1/8/2023**

205 CMR 213: WITHDRAWAL OF AN APPLICATION

213.01 Withdrawal of Application

- (1) Except as provided in 205 CMR 213.01(2), a written notice of withdrawal of an application or renewal papers may be filed by an Applicant, Qualifier, Licensee or Registrant at any time prior to final commission action thereon.
- (2) A withdrawal request submitted in accordance with 205 CMR 213.01(2) shall be permitted without the need for Commission approval except under the following conditions, in which cases no withdrawal will be allowed without express Commission approval upon a finding of good cause:
 - (a) If a hearing, or evaluation in accordance with 205 CMR 215.01(2)(c), on an initial application or renewal has been requested by a party or directed by the Bureau or Commission;
 - (b) If the Commission has made a determination to hear the application or renewal matter directly; or
 - (c) If the application or renewal matter has been assigned to any other hearing examiner authorized by law to hear such matter.
- (3) If the Commission agrees to grant withdrawal under any of the circumstances in 205 CMR 213.01(2), the Commission may condition that withdrawal with appropriate terms it deems necessary, including, but not limited to, a period of time within which the applicant may not re-apply.
- (4) The provisions of 205 CMR 111.05(4) governing the surrender of credentials shall govern the surrender of any credential issued under G.L. 23N or the sections of 205 CMR governing sports wagering.



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 of **205 CMR 213 WITHDRAWAL OF AN APPLICATION**.

This regulation is being promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and is primarily governed by G.L. c. 23N, § 4. It sets forth the required disclosure and reporting obligations of sports wagering operators to the Commission.

The proposed 205 CMR 213 applies to potential sports wagering operators and the Commission. Accordingly, this regulation is unlikely to have an impact on small businesses. Under 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:

This regulation is unlikely to have an impact on small businesses.

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

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

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

No standards applicable to small businesses are set forth.

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:

This amendment is unlikely to have any impact on the formation of new businesses in the Commonwealth.



Massachusetts Gaming Commission

Massachusetts Gaming Commission

By:

/s/ Caitlin W. Monahan
Caitlin W. Monahan, Deputy General Counsel

Dated: January 13, 2023



Massachusetts Gaming Commission

Massachusetts Gaming Commission
Briefing for Commissioners
January 18, 2023

Topic: Discussion of a sports wagering catalog for a vote of the Commission

Date/Time: MGC Public Meeting Friday January 20, 2023

Presenters: Sterl Carpenter, Regulatory Compliance Manager
 Bruce Band, Director of Sports Wagering Division

Introduction

On November 11, 2022, BetMGM in conjunction with PENN Entertainment and WynnBET provided the Massachusetts Gaming Commission (MGC) with a proposal regarding an initial event and wager-type catalog and process to be approved by the Commission. This proposal includes the permitted events, wagers and market types, a catalog of (would be) approved events, and explicitly prohibited events and wagers. This also includes a proposed process by which operators could request the MGC approve an event or wager not in the published and approved catalog.

Commissioners must approve a betting catalog, process, and allowable wagers and markets before operators are able to accept wagers. The MGC is fortunate that a number of other jurisdictions have launched sports wagering and approved similar catalogs to the one that is being presented today. MGC staff has reviewed the proposal submitted in November, reviewed the process in jurisdictions across the country, and conferred with consultants from GLI. It is recommended that the Commission approve this initial proposal from the operators with slight modifications, which are detailed below.

Approving this proposal today does not limit the Commission’s ability to revisit wager types, markets, events, governing bodies, or leagues in the future to either remove an item that was previously approved or to include one that was not previously approved.

Attached for your review is the original proposal submitted on November 11 (Attachment 1), a list of definitions and explanations (Attachment 2), the final proposal the Commission is being asked to take a vote on today (Attachment 3).

MGC staff are recommending that Commissioners hold on approving the following events proposed by operators: **chess, cornhole, e-sports, jai-alai, and specific special events including entertainment award shows and competitive eating events** to allow staff to further investigate the governing bodies and/or potential integrity issues. Additionally, it is recommended that the Commission approve a proposal that includes specific prohibitions on the statistical actions of coaches and/or officials, entertainment actions surrounding a sporting event (i.e. halftime performance; length of national anthem), the outcome of an action that could be considered a game of chance (coin flip), wagers on a result that could be reasonable knowable (what type of clothing a coach will wear), and wagers on collegiate sports outside of NCAA Division I.

Excluded from this proposal is allowing operators to accept wagers on the drafts of the MLB, NBA, NHL, NFL, and WNBA, as well as league awards such as Most Valuable Player or the Sixth Man of the Year Award, which are awards voted on and not sporting events in the sense that these results are not determined by a competition held at a set time inside a designated field of play. These events are sporting event adjacent and while other jurisdictions do allow these types of wagers, it should be called to Commissioner's attention and be subject to further discussion whether or not to allow these types of wagers.

Attachments

1. Operator submitted proposal (9 pages)
2. Definitions
3. MGC staff proposed catalog for review, discussion, vote

Attachment 1

November 11, 2022 proposal from operators (please see attachment 3 for proposed MA catalog)

Please note this document was originally on BetMGM letterhead

To:	Massachusetts Gaming Commission
Subject:	Event and Wager-Type Catalog
Date Submitted:	November 11, 2022

BetMGM, in conjunction with PENN Entertainment and WynnBET, provides the following proposal to the Massachusetts Gaming Commission regarding the Massachusetts Gaming Commission approved event and wager-type catalog and processes for Massachusetts sports wagering:

Catalog, Directive & Procedures for Approved Events and Wager-Types

Permitted Events

A Sports Wagering Operator (“Operator”) shall not accept any wager on an event unless the Operator has received written permission from the Massachusetts Gaming Commission (“the Commission”). Operators are considered to have written approval to offer any event that appears on the Approved Event List published by the Commission. Further, the Commission reserves the right to prohibit the acceptance of wagers and may order the cancellation of wagers and require refunds on any event for which wagering would be contrary to the public policies of the Commonwealth of Massachusetts.

To provide the Commission sufficient time to review a submission of a request to approve a new event, Operators shall submit the request to the Commission no less than 72 hours in advance of the day the Operator desires to accept wagers from the public on the new event.

A request to the Commission must include:

1. The name of the governing body in charge of administering the event; and
2. A description of the policies and procedures regarding the event’s integrity

Professional league drafts are approved for the MLB, NBA, NHL, NFL, and WNBA. In-draft (in-play) betting may be offered up to 2 selections prior to the actual occurrence on the draft broadcast(s). For example, “Pick #25 of the draft to be player x” would need to be placed prior to the announcement of pick #23”.

Unless otherwise specified, the following are authorized for approved leagues:

- Exhibition, pre-season, regular season, post-season, and all-star contests;
- Both men’s and women’s events; and
- Qualifying rounds

Once an event has been approved by the Commission, it is available to all Operators under the conditions approved. The Commission shall notify all Operators when an update is made to the Commission’s approved list.

Permitted Wager and Market Types

Unless otherwise specified, for all approved events, Operators may offer any market where the results are decided based on an outcome or outcomes determined because of an event or events sanctioned by a sports governing body approved by the Commission, based on the performance of a single or group of rostered or otherwise registered athletes, and determined on the field of play and can be proven by a box score, aggregation of box scores, or other statistical analysis.

Additionally, the Commission has pre-approved awards for all approved leagues where such awards are based on statistics, or votes, provided that the votes are collected in a manner that maintains the confidentiality of the outcome until the award is announced.

Approved Wager Types include the following:

- Single
- Parlay
- Teasers/Pleasers
- Round Robin
- Cash Out
- Pools
- Exchange Wagers

Approved Market Types include the following:

- Moneyline
- 3-Way
- Spread/Handicap
- Totals
- Player Props
- Game Props
- Team Props
- Futures/Outrights
- In-game/In-play
- Virtual Match Ups
- Next Occurrence
- Win/Place/Each Way
- Yes/No
- Awards

Any other type of wager must be sent to the Commission for approval the first time it is offered and may not be made available for wagering until approved by the Commission.

Once a wager or market type has been approved by the Commission, it is available to all Operators under the conditions approved.

Prohibitions

Prohibited Sports Events:

- High school and youth sports or athletic events.
- A collegiate sport or athletic event involving one or more collegiate teams from the Commonwealth unless they are involved in a collegiate tournament involving four or more collegiate teams.

Prohibited Sports Wagers:

- An outcome dependent on the performance of an individual athlete in any collegiate sport or athletic event, including, but not limited, to in-game or in-play wagers.
- Wagers on injuries, penalties, player discipline or replay review.
- Fantasy contests as defined in section 11M½ of 163 Chapter 12.

Catalog of Approved Events

1. Athletics
 - World Athletics (formerly known as International Association of Athletics Federations (IAAF))
2. Australian Rules Football
 - Australian Football League
3. Badminton
 - Badminton World Federation Grade 1 events (international) and Grade 2 events (World Tour)
4. Baseball/Softball
 - Major League Baseball (MLB)
 - NCAA Baseball and Softball
 - World Baseball Classic (WBC)
 - Minor League Baseball (MiLB) – Triple A
 - Japan Nippon Professional Baseball
 - Chinese Professional Baseball League
 - Korean KBO League
 - Athletes Unlimited Softball
 - Northwoods League
 - Texas Collegiate League
 - Mexican Baseball League (LMB)
 - Baseball Series de Caribe (CBC)
5. Basketball
 - National Basketball Association (NBA)
 - Women’s National Basketball Association (WNBA)
 - NCAA
 - Euro League/Euro Cup
 - International and domestic events sanctioned by FIBA or FIBA member federations
 - The Basketball Tournament (TBT)
 - Big Three
6. Biathlon
 - International Biathlon Union (IBU)
7. Billiards
 - World Pool Billiard Association Sanctioned Events
8. Bowling
 - Professional Bowlers Associations (PBA)
9. Bowls
 - Professional Bowls Association
 - World Bowls
10. Bull Riding/Rodeo
 - Professional Bull Riders (PBR)
 - Professional Rodeo Cowboys Association (PRCA)

11. Boxing

- World Boxing Association (WBA)
- World Boxing Council (WBC)
- World Boxing Organization (WBO)
- International Boxing Federation (IBF)
- British Board of Boxing Control (BBoC)
- Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association
- Bare Knuckle Fighting Championship
- African Boxing Union (WB)
- British & Irish Boxing Authority (BIBA)
- Global Boxing Union (GBU)
- International Boxing Association
- International Boxing Organization (IBO)
- International Boxing Union (IBU)
- Irish Athletic Boxing Association (IABA)
- Women's International Boxing Association (WIBA)
- World Boxing Federation (WBF)
- World Boxing Union (WBU)

12. Chess

- International Chess Federation (FIDE)
- PlayMagnus AS

13. Cornhole

- American Cornhole League (ACL Pro Division)

14. Cricket

- International and domestic events sanctioned by the International Cricket Council (ICC) or ICC member federations

15. Cycling

- Union Cycliste International (UCI) Sanctioned Events

16. Darts

- Professional Darts Corporation (PDC) Sanctioned Events
- British Darts Organization (BDO) Sanctioned Events
- MODUS Events
- World Dart Federation (WDF)

17. Disc

- American Ultimate Disc League

18. eSports

- Call of Duty League
- Counterstrike Global Offensive (CS:GO)
 - Blast Premier League
 - Electronic Sports League Sanctioned Events (ESL)
 - DreamHack Sanctioned Events

- Intel Extreme Masters (IEM)
- League of Legends (LoL)
 - LCK – League of Legends Champions Korea
 - LCS – League of Legends Champions Series
 - LEC – League of Legends European Championship
 - Riot Games Sanctioned Events
 - World Championships
- Dota 2
 - Valve Sanctioned Events
- NBA 2k League
- Overwatch League
- Rainbow 6
 - Ubisoft Sanctioned Events
- Valorant
 - Riot Games Sanctioned Events

19. Floorball

- International and domestic events sanctioned by Floorball Federation (IFF) or IFF or IFF member federations

20. Football

- National Football League (NFL)
- NCAA
- Canadian Football League (CFL)
- College Senior Bowl
- USFL
- XFL
- Indoor Football League (IFL)

21. Futsal

- International and domestic events sanctioned by FIFA or FIFA member federations

22. Golf

- Events sanctioned by the International Federation of PGA Tours or its members
- International Events (i.e. Ryder Cup, Solheim Cup, Presidents Cup)
- The Match Series
- Major Championships

23. Handball

- International and domestic events sanctioned by the International Handball Federation Events (IHF) or IHF member federations
- European Championship League

24. Hockey – Field

- International Hockey Federation (FHI) Sanctioned Events

25. Hockey - Ice

- National Hockey League (NHL)

- International and domestic events sanctioned by the International Ice Hockey Federation (IIHF) or IIHF member federations
 - NCAA
 - American Hockey League (AHL)
26. Jai-Alai
- Magic City Jai Alai
27. Lacrosse
- NCAA
 - Premier Lacrosse League
 - National Lacrosse League
 - World Lacrosse Sanctioned Events (Country v Country)
28. Mixed Martial Arts (MMA)
- Ultimate Fighting Championship (UFC)
 - Road to UFC
 - Dana White's Contender Series
 - Bellator MMA
 - ONE Championship
 - Professional Fighters League (PFL)
 - PFL Challenger Series
 - Cage Warriors
 - Glory
 - Invicta Fighting Championship
 - KSW
 - Legacy Fighting Alliance (LFA)
 - Spectation Sports
 - Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association
29. Olympics (including trials)
- Summer Olympics
 - Winter Olympics
30. Racing
- NASCAR:
 - Xfinity Series
 - Camping World Truck Series
 - NASCAR Cup Series
 - Fédération Internationale de l'Automobile (FIA) Sanctioned Events
 - Fédération Internationale de Motocyclisme (FIM) Sanctioned Events
 - Indy Racing League (Indy Car)
 - Superstar Racing Experience (SRX)
 - National Hot Rod Association (NHRA)
 - United States Auto Club (USAC) Sanctioned Events
31. Netball

- ANZ Premiership
 - Super Netball
32. Pesapallo
- Finnish Superpesis
 - Finnish Ykkospesis
33. Rowing
- University Boat Race
34. Rugby League
- International and domestic events sanctioned by International Rugby League (IRL) or IRL member federations
35. Rugby Union
- International and domestic events sanctioned by World Rugby or World Rugby member federations
 - SANZAAR Sanctioned Events
36. Sailing
- Americas Cup
 - Prada Cup Challenger Selection Series
37. Snooker
- World Snooker Sanctioned Events
 - World Professional Billiards and Snooker Association (WPBSA) Sanctioned Events
 - World Pool-Billiard Association (WPA) Sanctioned Events
 - International World Games Association (IWGA) Sanctioned Events
38. Soccer
- International and domestic events sanctioned by FIFA or FIFA member federations
 - Audi Cup
 - International Champions Cup
 - NCAA
39. Soccer – Beach
- Euro Beach Soccer League
 - Beach Soccer Worldwide Intercontinental Cup
40. Special Events
- Academy Awards (Oscars)
 - Emmy Awards
 - Nathan’s Famous Hot Dog Eating Contest
 - Major League Eating Sanctioned Events
41. Summer Athletics
- Commonwealth Games
 - X-Games
 - World Athletics Championships
 - World Athletics Indoor Tour
 - World Athletics Continental Tour
 - European Athletics Championships

42. Swimming

- Federation Internationale de Natation (FINA) World Championships

43. Table Tennis

- International and domestic events sanctioned by the International Table Tennis Federation (ITTF) or ITTF member federations
- TT Elite Series Poland
- TT Star Pro Series
- Challenger Sao Paolo
- TT Trophy Hungary
- Armenia ITT Cup League
- Challenger Series Betiebs GmbH.

44. Tennis

- ATP Tour Events; including Challenger Tour
- Grand Slam Events
- International Tennis Federation (ITF) Sanctioned Events (including country v. country)
- United States Tennis Association (USTA) Sanctioned Events
- World Team Tennis
- WTA Tour Events

45. Volleyball

- International and domestic events sanctioned by the Federation International de Volleyball (FIVB) or FIVB member federations
- Leagues and Events organized by FIVB member federations
- AVP Pro Beach Volleyball
- NCAA

46. Waterpolo

- FINA World Championships
- FINA World Cup
- FINA World League
- Ligue Européenne de Natation (LEN) European Championships
- LEN Champions League
- Adriatic League
- Italian Serie A1

47. Winter Athletics

- X-Games
- International Skating Union (ISU) World Championships and World Cup
- International Bobsleigh and Skeleton Federation (IBSF) World Championships
- International Luge Federation (FIL) World Championships
- Fédération Internationale de Ski (FIS, International Ski Federation) World Cup
- Four Hills Tournament

This Catalog, Directive and Procedures for Approved Events and Wager Types is subject to revision at any time in the sole discretion of the Commission.

Attachment 2

Definitions

Wagers

- Single: a wager on a single event
- Parlay: a wager on two or more events that are tied together.
- Teasers: a wager in which a bettor is able to adjust the point spread or total for a game. Adjustments that are made raise the likelihood of the bet hitting, but lower the payout.
- Pleasers: similar to a teaser, but opposite – the likelihood of the bet hitting becomes less likely but the payout is greater.
- Round Robin: a type of parlay bet where a series of smaller parlays are created from a larger list of bets.
- Cash Out: allows a sports bettor the ability to settle a bet before the competition ends. The amount the bet is settled for is less than that of what a bettor could have won should they had let the contest play out.
- Pools: a fixed price point form of betting where wagers are placed against other bettors who have entered the same event. Each winner's prize depends on the number of other players in the pool and the number of winners.
- Exchange Wagers: Exchanges operate like the stock market, with customers buying and selling sports outcomes instead of shares of companies. The exchange operator takes a commission for brokering the transaction, typically around 2% of the net profit of the winning side of the wager

Markets

- Moneyline: A moneyline wager is simply a bet type that only includes Odds, as in "Odds to win". Example: a moneyline of +150, is just +150 odds (\$100 to win \$150) for the listed team to win
- 3-Way: Three-way betting odds offer three wagering options that focus on regulation time results only. They differ from two-way odds as a TIE is added as a third betting choice. Three-way lines are offered in most competitions where a draw is a possible outcome
- Spread/Handicap: A wager on a team winning or losing by a certain number of points.
- Totals: the total number of points scored.
- Player Props: a wager on a specific action of a player.
- Game Props: a wager on a specific action happening during a game, i.e., total touchdowns scored
- Team Props: a wager on a specific team, i.e., a football team will have 2.5 or more turnovers
- Futures/Outrights: An outright bet is a futures market that requires you to wager on events that will take place after a specific period of time - the end of the season, the start of the playoffs, etc. It is one of the most common betting markets in sports such as Basketball, Soccer, and Football.
- In-game/In-play: A wager that is made during the course of a game on an action to take place during that game.
- Virtual Match Ups: Placing a wager on the outcome of a simulated event, the outcome of which are generated by a computer algorithm.
- Next Occurrence: a wager on the next goal scored, the next play to be a pass, the next basket will be a 3-pointer
- Win/Place/Each Way: Generally associated with horse racing, a win/place bet – otherwise

known as a win/show or each way bet – allows patrons to cover the possibility of a selection either winning or placing in a certain position.

- Yes/No: This market type refers to wagering on the occurrence or nonoccurrence of a specific proposition that can be determined on the field of play or by statistical analysis. The customer is given a choice to select “yes” or “no.” Some example markets include: (1) Will Team X score a Touchdown in the first quarter - yes or no; and (2) Will the game go to overtime - yes or no.
- Awards: wagers on team or individual awards.

Attachment 3

Initial Proposed Massachusetts Sports Wagering Catalog for Review

Catalog, Directive & Procedures for Approved Events and Wager-Types

Permitted Events

A Sports Wagering Operator (“Operator”) shall not accept any wager on an event unless the Operator has received written permission from the Massachusetts Gaming Commission (“the Commission”). Operators are considered to have written approval to offer any event that appears on the Approved Event List published by the Commission. Further, the Commission reserves the right to prohibit the acceptance of wagers and may order the cancellation of wagers and require refunds on any event for which wagering would be contrary to the public policies of the Commonwealth of Massachusetts.

To provide the Commission sufficient time to review a submission of a request to approve a new event, Operators shall submit the request to the Commission no less than 72 hours in advance of the day the Operator desires to accept wagers from the public on the new event.

A request to the Commission must include:

1. The name of the governing body in charge of administering the event; and
2. A description of the policies and procedures regarding the event’s integrity

Unless otherwise specified, the following are authorized for approved leagues:

- Exhibition, pre-season, regular season, post-season, and all-star contests;
- Both men’s and women’s events; and
- Qualifying rounds

Once an event has been approved by the Commission, it is available to all Operators under the conditions approved. The Commission shall notify all Operators when an update is made to the Commission’s approved list.

Permitted Wager and Market Types

Unless otherwise specified, for all approved events, Operators may offer any market where the results are decided based on an outcome or outcomes determined because of an event or events sanctioned by a sports governing body approved by the Commission, based on the performance of a single or group of rostered or otherwise registered athletes, and determined on the field of play and can be proven by a box score, aggregation of box scores, or other statistical analysis.

Additionally, the Commission has pre-approved awards for all approved leagues where such awards are based solely on statistics.

Approved Wager Types include the following:

- Single
- Parlay
- Teasers/Pleasers
- Round Robin
- Cash Out
- Pools
- Exchange Wagers

Approved Market Types include the following:

- Moneyline
- 3-Way
- Spread/Handicap
- Totals
- Player Props
- Game Props
- Team Props
- Futures/Outrights
- In-game/In-play
- Virtual Match Ups
- Next Occurrence
- Win/Place/Each Way
- Yes/No
- Awards (statistically decided only – non-voting awards)

Any other type of wager must be sent to the Commission for approval the first time it is offered and may not be made available for wagering until approved by the Commission

Once a wager or market type has been approved by the Commission, it is available to all Operators under the conditions approved.

Prohibitions

Prohibited Sports Events:

- High school and youth sports or athletic events.
- A collegiate sport or athletic event involving one or more collegiate teams from the Commonwealth unless they are involved in a collegiate tournament involving four or more collegiate teams.
- A collegiate sports or athletic event outside of NCAA Division I

Prohibited Sports Wagers:

- An outcome dependent on the performance of an individual athlete in any collegiate sport or athletic event, including, but not limited, to in-game or in-play wagers.

- Wagers on injuries, penalties, player discipline or replay review.
- Fantasy contests as defined in section 11M½ of 163 Chapter 12.
- the statistical actions of coaches and/or officials.
- Entertainment actions surrounding a sporting event (i.e. halftime performance; length of national anthem)
- The outcome of an action that could be considered a game of chance (coin flip)
- Wagers on a result that could be reasonable knowable (what type of clothing a coach will wear)

Currently prohibited - for further review and future consideration

- Chess
- Cornhole
- E-sports
- Jai-alai
- Entertainment award shows
- Competitive eating events
- Professional sports drafts
- Awards presented to an individual or team that are decided by a vote

Catalog of Approved Events

1. Athletics
 - World Athletics (formerly known as International Association of Athletics Federations)
2. Australian Rules Football
 - Australian Football League
3. Badminton
 - Badminton World Federation Grade 1 events (international events) and Grade 2 events (World Tour)
4. Baseball/Softball
 - Major League Baseball (MLB)
 - NCAA Baseball and Softball
 - World Baseball Classic (WBC)
 - Minor League Baseball (MiLB) – Triple A
 - Japan Nippon Professional Baseball
 - Chinese Professional Baseball League
 - Korean KBO League
 - Athletes Unlimited Softball
 - Northwoods League
 - Texas Collegiate League
 - Mexican Baseball League (LMB)
 - Baseball Series de Caribe (CBC)
5. Basketball
 - National Basketball Association (NBA)
 - Women’s National Basketball Association (WNBA)

- NCAA
 - Euro League/Euro Cup
 - International and domestic events sanctioned by FIBA or FIBA member federations
 - The Basketball Tournament (TBT)
 - Big Three
6. Biathlon
 - International Biathlon Union (IBU)
 7. Billiards
 - World Pool Billiard Association sanctioned events
 8. Bowling
 - Professional Bowlers Association (PBA)
 9. Bowls
 - Professional Bowls Association
 - World Bowls
 10. Bull Riding/Rodeo
 - Professional Bull Riders (PBR)
 - Professional Rodeo Cowboys Association (PRCA)
 11. Boxing
 - World Boxing Association (WBA)
 - World Boxing Council (WBC)
 - World Boxing Organization (WBO)
 - International Boxing Federation (IBF)
 - British Board of Boxing Control (BBoC)
 - Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association
 - Bare Knuckle Fighting Championship
 - African Boxing Union (WB)
 - British & Irish Boxing Authority (BIBA)
 - Global Boxing Union (GBU)
 - International Boxing Association
 - International Boxing Organization (IBO)
 - International Boxing Union (IBU)
 - Irish Athletic Boxing Association (IABA)
 - Women's International Boxing Association (WIBA)
 - World Boxing Federation (WBF)
 - World Boxing Union (WBU)
 12. Cricket
 - International and domestic events sanctioned by the International Cricket Council (ICC) or ICC member federations
 13. Cycling
 - Union Cycliste International (UCI) sanctioned events
 14. Darts
 - Professional Darts Corporation (PDC) Sanctioned Events
 - British Darts Organization (BDO) Sanctioned Events
 - MODUS Events
 - World Dart Federation (WDF)

15. Disc
 - American Ultimate Disc League
16. Floorball
 - International and domestic events sanctioned by Floorball Federation (IFF) or IFF member federations
17. Football
 - National Football League (NFL)
 - NCAA
 - Canadian Football League (CFL)
 - College Senior Bowl
 - USFL
 - XFL
 - Indoor Football League (IFL)
18. Futsal
 - International and domestic events sanctioned by FIFA or FIFA member federations
19. Golf
 - Events sanctioned by the International Federation of PGA Tours or its members
 - International Events (i.e. Ryder Cup, Solheim Cup, Presidents Cup)
 - The Match Series
 - Major Championships
20. Handball
 - International and domestic events sanctioned by the International Handball Federation Events (IHF)
21. Hockey – Field
 - International Hockey Federation (FHI) sanctioned events
22. Hockey – Ice
 - National Hockey League (NHL)
 - International and domestic events sanctioned by the International Ice Hockey Federation (IIHF) or IIHF member federations
 - NCAA
 - American Hockey League (AHL)
23. Lacrosse
 - NCAA
 - Premier Lacrosse League
 - National Lacrosse League
 - World Lacrosse Sanctioned Events (country v. country)
24. Mixed Martial Arts
 - Ultimate Fighting Championship (UFC)
 - Road to UFC
 - Dana White’s Contender Series
 - Bellator MMA
 - ONE Championship
 - Professional Fighters League (PFL)
 - PFL Challenger Series
 - Cage Warriors
 - Glory

- Invicta Fighting Championship
 - KSW
 - Legacy Fighting Alliance (LFA)
 - Spectation Sports
 - Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association
25. Olympics (including trials)
- Summer Olympics
 - Winter Olympics
26. Racing
- NASCAR:
 - Xfinity Series
 - Camping World Truck Series
 - NASCAR Cup Series
 - Fédération Internationale de l'Automobile (FIA) Sanctioned Events
 - Fédération Internationale de Motocyclisme (FIM) Sanctioned Events
 - Indy Racing League (Indy Car)
 - Superstar Racing Experience (SRX)
 - National Hot Rod Association (NHRA)
 - United States Auto Club (USAC) Sanctioned Events
27. Netball
- ANZ Premiership
 - Super Netball
28. Pesapallo
- Finnish Superpesis
 - Finnish Ykkospesis
29. Rowing
- University Boat Race
30. Rugby League
- International and domestic events sanctioned by International Rugby League (IRL) or IRL member federations
31. Rugby Union
- International and domestic events sanctioned by World Rugby or World Rugby member federations
 - SANZAAR Sanctioned Events
32. Sailing
- Americas Cup
 - Prada Cup Challenger Selection Series
33. Snooker
- World Snooker Sanctioned Events
 - World Professional Billiards and Snooker Association (WPBSA) Sanctioned Events
 - World Pool-Billiard Association (WPA) Sanctioned Events
 - International World Games Association (IWGA) Sanctioned Events
34. Soccer
- International and domestic events sanctioned by FIFA or FIFA member federations
 - Audi Cup

- International Champions Cup
 - NCAA
35. Soccer – Beach
- Euro Beach Soccer League
 - Beach Soccer Worldwide Intercontinental Cup
36. Summer Athletics
- Commonwealth Games
 - X-Games
 - World Athletics Championships
 - World Athletics Indoor Tour
 - World Athletics Continental Tour
 - European Athletics Championships
37. Swimming
- Federation Internationale de Natation (FINA) World Championships
38. Table Tennis
- International and domestic events sanctioned by the International Table Tennis Federation (ITTF) or ITTF member federations
 - TT Elite Series Poland
 - TT Star Pro Series
 - Challenger Sao Paolo
 - TT Trophy Hungary
 - Armenia ITT Cup League
 - Challenger Series Betriebs GmbH
39. Tennis
- ATP Tour Events; including Challenger Tour
 - Grand Slam Events
 - International Tennis Federation (ITF) Sanctioned Events (including country v. country)
 - United States Tennis Association (USTA) Sanctioned Events
 - World Team Tennis
 - WTA Tour Events
40. Volleyball
- International and domestic events sanctioned by the Federation International de Volleyball (FIVB) or FIVB member federations
 - Leagues and Events organized by FIVB member federations
 - AVP Pro Beach Volleyball
 - NCAA
41. Water Polo
- FINA World Championships
 - FINA World Cup
 - FINA World League
 - Ligue Européenne de Natation (LEN) European Championships
 - LEN Champions League
 - Adriatic League
 - Italian Serie A1
42. Winter Athletics
- X-Games

- International Skating Union (ISU) World Championships and World Cup
- International Bobsleigh and Skeleton Federation (IBSF) World Championships
- International Luge Federation (FIL) World Championships
- Fédération Internationale de Ski (FIS, International Ski Federation) World Cup
- Four Hills Tournament

This Catalog, Directive and Procedures for Approved Events and Wager Types is subject to revision at any time in the sole discretion of the Commission.



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

FROM: Sterl Carpenter – Regulatory Compliance Manager

CC: Karen Wells – Executive Director

DATE: January 6, 2023

RE: Events and Wagers requests

Introduction:

The category 1 retail licensees of the Commonwealth have submitted a request for specific wagers and events to be allowed by the commission. The wagers and events will be added to the catalog, subject to commission approval. The requested wagers and their definitions are as follows:

Wagers:

From the Statute

Single-game bets - You place a single bet on a single outcome of an event. If your bet is correct, you win. If your bet is incorrect, you lose.

For example:

Baseball Team B loses the first game but wins games two and three, so you win the bet.

You win your original stake, plus the winnings.

Teaser bets – Teasers and pleasers are versions of parlay or combined wagers that allow the bettor to adjust point spreads in exchange for a lower potential return. In some ways, teasers and pleasers are opposite sides of the same coin. One works in your favor for a reduced payout, while the other goes against your favor for potentially larger payouts and improved odds of winning.

Parlays – A 'Parlay' bet is a bet placed on multiple outcomes to occur. For a Parlay bet to win, all outcomes within the Parlay must be selected correctly. The odds for each pick are multiplied by one another to determine the odds for the Parlay.



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Over-under - A bet on the over means you think both teams will combine to score more goals, points, or runs than the total listed. Conversely, an under bet means you think there will be less than the total listed.

Moneyline - A moneyline wager is simply a bet type that only includes Odds, as in “Odds to win”. Example: a moneyline of +150, is just +150 odds (\$100 to win \$150) for the listed team to win

Pools - are a fixed price point form of betting where wagers are placed against other bettors who have entered the same event. Each winner's prize depends on the number of other players in the pool and the number of winners.

Exchange wagering - Exchanges operate similarly to the stock market, with customers buying and selling sports outcomes instead of shares of companies. The exchange operator takes a commission for brokering the transaction, typically around 2% of the net profit of the winning side of the wager.

In-game wagering - is simply wagering on a **game** while it’s happening. Sportsbook odds for the in-game will usually only change during a timeout or commercial break.

In-play wagering - is betting on a game already in progress. Bettors will find that many of the most popular pregame bets morph into an in-play form once the bell sounds.

Proposition bets – or prop bet is basically a wager on a game not directly tied to the actual outcome of the contest. There are props that have to do with a game as a whole, as well as on the performance of the teams involved. Many of the most popular props revolve around the accomplishments of individual players.

Straight bets - is as simple as it sounds, a single wager on an event.

Requested by Licensees

Point spreads - the value of the point spread is added to the team's total as part of the wager. Bettors who choose the underdog win their wager when that team either wins the event outright OR loses by an amount less than the point spread.

Pleasers – See teasers definition above.

Round Robin - A round robin in sports betting is really just a series of smaller parlays created from a larger list of bets.

A round robin gets its name from a round robin tournament, in which every team plays every other team in its group. The idea is the same. Instead of playing each other, the teams form parlays together.



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When you select multiple games to bet, your sportsbook will give you the option to create a series of smaller parlays made up of your selected games.

Cash out - A Cash Out, otherwise known as a Buy Out, is a feature that allows sports bettors the ability to settle a bet — and accept a payout less than the full potential win — before the competition ends. The upside, if you take the offer, is locking up some profit that is yours to keep regardless of how the score/event ultimately plays out.

Because Cash Outs tend to be most commonly offered while an event is running and before it ends, Cash Outs can be viewed as a live in-game betting feature. But Cash Outs may be offered mid-season on long-term futures bets as well, such as a wager on the NFL Rookie of the Year, or NBA Champion, for example.

3-way - Simply put, three-way betting odds offer three wagering options that focus on regulation time results only. They differ from two-way odds as a TIE is added as a third betting choice. Three-way lines are offered in most competitions where a draw is a possible outcome.

Spread/handicap - markets are when it is possible to bet on whether the chosen outcome will win by more than a specific number of points, or lose by less than a specific number of points. The bet will be declared void if the outcome is tied once the spread has been applied.

Totals - An over/under in sports betting is a wager on the total number of points in a game. It's also called “the total.” A bettor can wager on whether or not the combined points/goals/runs scored by both teams will go over or under a predetermined amount. You're not trying to guess the exact amount.

Player-game-team props - wagers on a particular player performing certain value in a category – game Team A and Team B will pass for over 500 yards in the game – team Team A will pass for over 225 yards

Futures/outrights - An outright bet is a futures market that requires you to wager on events that will take place after a specific period of time - the end of the season, the start of the playoffs, etc. It is one of the most common betting markets in sports such as Basketball, Soccer, and Football.

Virtual Match Ups - The outcomes from each match or event are generated by a computer algorithm that picks the winner in a non-bias way.

*** This is not recommended at this time due to it being more of an iGaming product rather than a sports wager.**

Next Occurrence – the next goal scored, the next play will be a pass, the next shot will be a 3-pointer

Yes/no – This market type refers to wagering on the occurrence or nonoccurrence of a specific proposition that can be determined on the field of play or by statistical analysis. The customer is



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given a choice to select “yes” or “no.” Some example markets include: (1) Will Team X score a Touchdown in the first quarter - yes or no; and (2) Will the game go to overtime - yes or no.

Win/Place/Each Way - Generally associated with horse racing, a win/place bet – otherwise known as a win/show or each way bet – allows patrons to cover the possibility of a selection either winning or placing in a certain position. You can think of a win/place bet as two separate bets: to win and to show. In the US, most horse racing betting sites allow customers to place combination straight bets. However, you may only be offered Win/Place, which isn’t a pure win/place wager as the Place bet only covers positions 1 and 2. EachWay-When you bet a golfer (and even some other sports) at a number of United States sportsbooks, you may see a little box next to their name.

“Each Way” or “E/W”, followed by a fraction and some numbers.

This is a popular betting concept in Europe but hasn’t quite become mainstream in the U.S. yet. It’s used most often in golf, but it also applies to other sports with big fields, like motor sports or horse racing.

Awards – wagers on teams or individuals winning accolades from performance or **voting**.

Events requested by the licensees:

The licensees have requested the following 47 events be added to the catalog. We highlight several events for review that the commission should turn their attention to when reviewing.

1. Athletics

- World Athletics (formerly known as International Association of Athletics Federations (IAAF))

2. Australian Rules Football

- Australian Football League

3. Badminton

- Badminton World Federation Grade 1 events (international) and Grade 2 events (World Tour)

4. Baseball/Softball

- Major League Baseball (MLB)
- NCAA Baseball and Softball
- World Baseball Classic (WBC)
- Minor League Baseball (MiLB) – Triple A
- Japan Nippon Professional Baseball
- Chinese Professional Baseball League
- Korean KBO League
- Athletes Unlimited Softball
- Northwoods League



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- Texas Collegiate League
- Mexican Baseball League (LMB)
- Baseball Series de Caribe (CBC)

5. Basketball

- National Basketball Association (NBA)
- Women's National Basketball Association (WNBA)
- NCAA
- Euro League/Euro Cup
- International and domestic events sanctioned by FIBA or FIBA member federations
- The Basketball Tournament (TBT)
- Big Three

6. Biathlon

- International Biathlon Union (IBU)

7. Billiards

- World Pool Billiard Association Sanctioned Events

8. Bowling

- Professional Bowlers Associations (PBA)

9. Bowls

- Professional Bowls Association
- World Bowls

10. Bull Riding/Rodeo

- Professional Bull Riders (PBR)
- Professional Rodeo Cowboys Association (PRCA)

11. Boxing

- World Boxing Association (WBA)
- World Boxing Council (WBC)
- World Boxing Organization (WBO)
- International Boxing Federation (IBF)
- British Board of Boxing Control (BBoc)
- Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association
- Bare Knuckle Fighting Championship
- African Boxing Union (WB)
- British & Irish Boxing Authority (BIBA)
- Global Boxing Union (GBU)
- International Boxing Association



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- International Boxing Organization (IBO)
- International Boxing Union (IBU)
- Irish Athletic Boxing Association (IABA)
- Women’s International Boxing Association (WIBA)
- World Boxing Federation (WBF)
- World Boxing Union (WBU)

12. Chess

- International Chess Federation (FIDE)
- PlayMagnus AS

13. Cornhole (question on their oversight)

- American Cornhole League (ACL Pro Division)

14. Cricket

- International and domestic events sanctioned by the International Cricket Council (ICC) or ICC member federations

15. Cycling

- Union Cycliste International (UCI) Sanctioned Events

16. Darts

- Professional Darts Corporation (PDC) Sanctioned Events
- British Darts Organization (BDO) Sanctioned Events
- MODUS Events
- World Dart Federation (WDF)

17. Disc

- American Ultimate Disc League

18. eSports

- Call of Duty League
- Counterstrike Global Offensive (CS:GO)
 - o Blast Premier League
 - o Electronic Sports League Sanctioned Events (ESL)
 - o DreamHack Sanctioned Events
 - o Intel Extreme Masters (IEM)
- League of Legends (LoL)
 - o LCK – League of Legends Champions Korea
 - o LCS – League of Legends Champions Series
 - o LEC – League of Legends European Championship
 - o Riot Games Sanctioned Events
 - o World Championships



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- Dota 2
- o Valve Sanctioned Events
- NBA 2k League
- Overwatch League
- Rainbow 6
- o Ubisoft Sanctioned Events
- Valorant
- o Riot Games Sanctioned Events

19. Floorball

- International and domestic events sanctioned by Floorball Federation (IFF) or IFF or IFF member federations

20. Football

- National Football League (NFL)
- NCAA
- Canadian Football League (CFL)
- College Senior Bowl
- USFL
- XFL
- Indoor Football League (IFL)

21. Futsal

- International and domestic events sanctioned by FIFA or FIFA member federations

22. Golf

- Events sanctioned by the International Federation of PGA Tours or its members
- International Events (i.e. Ryder Cup, Solheim Cup, Presidents Cup)
- The Match Series
- Major Championships

23. Handball

- International and domestic events sanctioned by the International Handball Federation Events (IHF) or IHF member federations
- European Championship League

24. Hockey – Field

- International Hockey Federation (FHI) Sanctioned Event

25. Hockey - Ice

- National Hockey League (NHL)
- International and domestic events sanctioned by the International Ice Hockey Federation (IIHF) or IIHF member federations



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- NCAA
- American Hockey League (AHL)

26. Jai-Alai

- Magic City Jai Alai

27. Lacrosse

- NCAA
- Premier Lacrosse League
- National Lacrosse League
- World Lacrosse Sanctioned Events (Country v Country)

28. Mixed Martial Arts (MMA)

- Ultimate Fighting Championship (UFC)
- Road to UFC
- Dana White's Contender Series
- Bellator MMA
- ONE Championship
- Professional Fighters League (PFL)
- PFL Challenger Series
- Cage Warriors
- Glory
- Invicta Fighting Championship
- KSW
- Legacy Fighting Alliance (LFA)
- Spectation Sports
- Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association

29. Olympics (including trials)

- Summer Olympics
- Winter Olympics

30. Racing

- NASCAR:
 - o Xfinity Series
 - o Camping World Truck Series
 - o NASCAR Cup Series
- Fédération Internationale de l'Automobile (FIA) Sanctioned Events
- Fédération Internationale de Motocyclisme (FIM) Sanctioned Events
- Indy Racing League (Indy Car)
- Superstar Racing Experience (SRX)
- National Hot Rod Association (NHRA)



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- United States Auto Club (USAC) Sanctioned Events

31. Netball

- ANZ Premiership
- Super Netball

32. Pesapallo

- Finnish Superpesis
- Finnish Ykkospesis

33. Rowing

- University Boat Race

34. Rugby League

- International and domestic events sanctioned by International Rugby League (IRL) or IRL member federations

35. Rugby Union

- International and domestic events sanctioned by World Rugby or World Rugby member federations
- SANZAAR Sanctioned Events

36. Sailing

- Americas Cup
- Prada Cup Challenger Selection Series

37. Snooker

- World Snooker Sanctioned Events
- World Professional Billiards and Snooker Association (WPBSA) Sanctioned Events
- World Pool-Billiard Association (WPA) Sanctioned Events
- International World Games Association (IWGA) Sanctioned Events

38. Soccer

- International and domestic events sanctioned by FIFA or FIFA member federations
- Audi Cup
- International Champions Cup
- NCAA

39. Soccer – Beach

- Euro Beach Soccer League
- Beach Soccer Worldwide Intercontinental Cup

40. **Special Events**



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- Academy Awards (Oscars)
- Emmy Awards
- Nathan's Famous Hot Dog Eating Contest
- Major League Eating Sanctioned Events

41. Summer Athletics

- Commonwealth Games
- X-Games
- World Athletics Championships
- World Athletics Indoor Tour
- World Athletics Continental Tour
- European Athletics Championships

42. Swimming

- Federation Internationale de Natation (FINA) World Championships

43. Table Tennis

- International and domestic events sanctioned by the International Table Tennis Federation (ITTF) or ITTF member federations
- TT Elite Series Poland
- TT Star Pro Series
- Challenger Sao Paolo
- TT Trophy Hungary
- Armenia ITT Cup League
- Challenger Series Betiebs GmbH.

44. Tennis

- ATP Tour Events; including Challenger Tour
- Grand Slam Events
- International Tennis Federation (ITF) Sanctioned Events (including country v. country)
- United States Tennis Association (USTA) Sanctioned Events
- World Team Tennis
- WTA Tour Events

45. Volleyball

- International and domestic events sanctioned by the Federation International de Volleyball (FIVB) or FIVB member federations
- Leagues and Events organized by FIVB member federations
- AVP Pro Beach Volleyball
- NCAA

46. Waterpolo

- FINA World Championships



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- FINA World Cup
- FINA World League
- Ligue Européenne de Natation (LEN) European Championships
- LEN Champions League
- Adriatic League
- Italian Serie A1

47. Winter Athletics

- X-Games
- International Skating Union (ISU) World Championships and World Cup
- International Bobsleigh and Skeleton Federation (IBSF) World Championships
- International Luge Federation (FIL) World Championships
- Fédération Internationale de Ski (FIS, International Ski Federation) World Cup
- Four Hills Tournament

* The highlighted events have been brought to the commissions' attention due to questions on either the betting, league oversight, integrity question, or whether it can be considered a sporting event.



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1. This outline divides the event and wagering catalog approval into two separate but related decisions:
 - i. Approved wager types i.e., the kind of wagers that are approved as defined in M.G.L. c. 23N, § 3 for sports wagering:
 1. Single-game bets.
 2. Teaser bets.
 3. Parlays.
 4. Over-under.
 5. Moneyline.
 6. Pools.
 7. Exchange wagering.
 8. In-game wagering or in-play bets (*Next Occurrence*).
 9. Proposition bets.
 10. Straight bets.
 11. Point spreads,
 12. Pleasers
 13. Round robin
 14. Cash out
 15. 3-way
 16. Spread/handcap
 17. Totals
 18. Player-game-team props
 19. Futures/outrights
 20. Yes/no
 21. Win/Place/Each Way

2. Wager Types

2. Approved Wager Types
 - i. Any wager that meets the criteria detailed in this section and is not superseded elsewhere herein is approved.
 - ii. Criteria, event is:
 1. It is decided based on an outcome or outcomes determined because of an event or events sanctioned by a governing body or equivalent approved by MGC.
 2. It is based on statistical results which can be verified by a data source, a box score, aggregation of box scores or data sources, or other statistical analysis.
 3. It is based on the performance of a single or group of rostered or otherwise registered athletes.



- 4. It is based on the result of an outcome on the field of play (including the virtual field of play for eSports).
- iii. Approved wagers can be combined by the operator into parlay wagers.
- 3. Disapproved Wager Types
 - i. Any wager that meets the criteria detailed in this section is disapproved.
 - ii. In case of conflict between these disapproved wager types and the approved wager types detailed above, the disapproved shall supercede.
 - iii. Disapproval Criteria:
 - 1. The statistical actions of coaches, officials, or referees. For example, number of timeouts called, number of yellow cards issued, etc.
 - 2. Inherently objectionable outcomes. For example, will any player suffer an injury, how much time will an injured or resting player miss, will any player be ejected from a game, or similar.
 - 3. Any actions by persons participating in entertainment surrounding the sporting event, but not the sporting event itself. For example, halftime performances, cheerleading activity, band performances, etc.
 - 4. Any outcome determined solely by a coin flip, roulette, poker, blackjack, a card game, a dice game, or any other game or contest typically offered in a casino other than sports wagering.
 - 5. Clothing, equipment characteristics (sports drinks, etc.), or any other item in which the outcome is determined prior to the performance of the athletes in the event.
- 4. Wagers Requiring Specific Approval
 - i. Any wager involving any of the following criteria is NOT generally approved and requires specific MGC approval to be offered:
 - 1. Awards which are voted on by league referees, officials, or athletes, or members of the news media, fans, etc. or that are not exclusively based on statistical results.
 - 2. Combines, or other player evaluation or selection events.
- 5. Wager Type Approval
 - i. Operators must receive MGC approval prior to offering the new event or wager type.
 - ii. Approvals are granted at the discretion of MGC.

Vote:

iii. Guideline tab

- 1. Exhibition, pre-season, regular season, all-star games, all-star contest, and post-season



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- 2. Guideline on wagers for sports drafts
- 3. Awards Section 8
- 4. Awards Section 9
- 5. Pool wagers



Vote:

3. Event Types

i. Approved events.

- 1. Events are further subdivided into:
 - i. Approved governing bodies i.e. NFL, NBA, MLB.
 - ii. If necessary, approved events within that governing bodies jurisdiction i.e. pre-season, regular season and playoff games.
- 2. Types of Wagers Permitted
 - i. Unless otherwise restricted, for all approved leagues, operators may request to offer any approved wager or proposition bet where the results are determined on the field of play and can be verified by a box score, other data source or statistical analysis.
- 3. Prohibited Events (Commonwealth specific prohibited events detailed here)
 - i. Any non-tournament collegiate sport or athletic event that takes place within the jurisdiction or a sport or athletic event in which any college team from the jurisdiction participates regardless of where the event takes place.
 - ii. Events which are pre-recorded or in which the outcome has been otherwise previously determined and publicly known.
 - iii. Events for primary or secondary school students, whether conducted or sponsored by a primary or secondary school or by another person, or the individual performance statistics of athletes or participants in such an event.
 - iv. Events in which more than 50% of the participating athletes are under age 18.
- 1. Current Approved Governing Bodies/Events unless otherwise stipulated, all events sanctioned by the regulatory body are approved. For example, the NFL is approved for all preseason, regular season and post season games (above).
- 2. The following are approved regulatory bodies/events.
 - v. Australian Rules Football
 - 1. Australian Football League
 - vi. Badminton
 - 1. Badminton World Federation
 - a. Grade 1 Events (International)
 - b. Grade 2 Events (World Cup)
 - vii. Baseball
 - 1. Major League Baseball (MLB)
 - a. MLB



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- b. Triple A
 - 2. NCAA
 - 3. World Baseball Softball Confederation
 - a. World Baseball Classic
 - 4. Nippon Professional Baseball Organization
 - 5. Chinese Professional Baseball League
 - 6. Korean Baseball Organization (KBO)
 - 7. Northwoods League
 - 8. Texas Collegiate League
 - 9. Liga Mexicana De Beisbol
 - 10. Confederacion de Beisbol Profesional del Caribe
- viii. Basketball
 - 1. National Basketball Association (NBA)
 - 2. Women’s National Basketball Association (WNBA)
 - 3. NCAA
 - 4. Euroleague Basketball
 - a. Euro League
 - b. Euro Cup
 - 5. FIBA
 - a. International and domestic events sanctioned by FIBA or FIBA member federations.
 - 6. TBT Enterprises
 - a. The Basketball Tournament (TBT)
 - 7. Big3
- ix. Biathlon
 - 1. International Biathlon Union (IBU)
- x. Bowling
 - 1. Professional Bowlers Association National Tour
- xi. Bowls (Lawn)
 - 1. Professional Bowls Association
 - 2. World Bowls
- xii. Boxing
 - 1. Women's International Boxing Association (WIBA)
 - 2. World Boxing Federation (WBF)
 - 3. World Boxing Union (WBU)
 - 4. Bare Knuckle Fighting Championship
- xiii. Chess
 - 1. International Chess Federation (FIDE)
- xiv. Cornhole
 - 1. American Cornhole League



Massachusetts Gaming Commission

- a. ACL Pro Division
- xv. Cricket
 - 1. International Cricket Council (ICC)
 - a. International and domestic events sanctioned by the International Cricket Council (ICC) or ICC member federations
- xvi. Cycling
 - 1. Union Cycliste Internationale (UCI)
 - a. Union Cycliste International (UCI) Sanctioned Events
- xvii. Darts
 - 1. British Darts Organisation (BDO)
 - 2. MODUS
 - 3. Professional Darts Corporation (PDC)
 - 4. World Dart Federation (WDF)
- xviii. Disc
 - 1. American Ultimate Disc League
- xix. Esports
 - 1. Call of Duty League
 - a. Call of Duty League
 - 2. Counterstrike Global Offensive (CS:GO)
 - a. Blast Premier League (CS:GO)
 - 3. League of Legends (LoL)
 - a. Electronic Sports League Sanctioned Events (ESL) (CS:GO)
 - 4. Dota 2
 - a. DreamHack Sanctioned Events (CS:GO)
 - 5. NBA 2k League
 - a. Intel Extreme Masters (IEM) (CS:GO)
 - 6. Overwatch League LCK
 - a. League of Legends Champions Korea
 - 7. Rainbow 6 LCS
 - a. League of Legends Champions Series
 - 8. Valorant
 - a. LEC – League of Legends European Championship
 - b. Riot Games Sanctioned Events (LoL) (Valorant)
 - c. World Championships (LoL)
 - d. Valve Sanctioned Events (DOTA 2)
 - e. NBA 2K League
 - f. Overwatch League
 - g. Ubisoft Sanctioned Events (Rainbow 6)
- xx. Floorball



Massachusetts Gaming Commission

- 1. International Floorball Federation (IFF)
- xxi. Football-American
 - 1. Canadian Football League (CFL)
 - 2. National Football League (NFL)
 - 3. USFL
 - 4. Indoor Football League (IFL)
 - 5. NCAA
 - 6. College Senior Bowl
 - 7. XFL
- xxii. Futsal
 - 1. Fédération Internationale de Football Association (FIFA)
- xxiii. Golf
 - 1. International Federation of PGA Tours or its Members
 - a. International Events
 - b. Events sanctioned by the International Federation of PGA Tours or its members
 - 2. Augusta National Golf Club
 - a. Masters Tournament
 - 3. PGA of America
 - a. PGA Championship
 - 4. The R&A
 - a. The Open Championship
 - 5. United States Golf Association
 - a. US Open
 - 6. The Match Series
- xxiv. Handball
 - 1. International Handball Federation (IHF)
 - 2. European Handball Federation (EHF)
 - a. European Champions League
- xxv. Field Hockey
 - 1. International Hockey Federation (FIH)
- xxvi. Ice Hockey
 - 1. American Hockey League (AHL)
 - 2. National Hockey League (NHL)
 - 3. International Ice Hockey Federation (IIHF)
 - 4. NCAA
- xxvii. Lacrosse
 - 1. National Lacrosse League (NLL)
 - 2. Premiere Lacrosse League (PLL)
 - 3. World Lacrosse



Massachusetts Gaming Commission

- 4. NCAA
- xxviii. Mixed Martial Arts
 - 1. Ultimate Fighting Championship (UFC)
 - a. Road to UFC
 - b. Dana White's Contender Series
 - 2. Bellator MMA
 - 3. ONE Championship
 - 4. Professional Fighters League (PFL)
 - a. Professional Fighters League (PFL)
 - b. PFL Challenger Series
 - 5. Association of Boxing Commissions and Combative Sports (ABCCS) members or other US State Associations
 - 6. Cage Warriors
 - 7. Invicta Fighting Championship
 - 8. KSW
 - 9. Legacy Fighting Alliance (LFA)
 - 10. Spectation Sports
- xxix. Motorsport
 - 1. FIA Sanctioned Events
 - 2. FIM Sanctioned Events
 - 3. IndyCar
 - 4. Xfinity Series
 - 5. Camping World Truck Series
 - 6. NASCAR Cup Series
 - 7. USAC Sanctioned Events
 - 8. NHRA Sanctioned Events
- xxx. Netball
 - 1. Netball New Zealand
 - a. ANZ Premiership
 - 2. Netball Australia
 - a. Super Netball
- xxxi. Olympics
 - 1. Summer Olympic Games
 - 2. Winter Olympic Games
- xxxii. Pesapallo
 - 1. Finnish Pesäpallo Association
 - a. Finnish Superpesis
- xxxiii. Pool
 - 1. World Pool Billiard Association (WPA)
- xxxiv. Rodeo



- 1. Professional Bull Riders (PBR)
- 2. Professional Rodeo Cowboys Association (PRCA)
- xxxv. Rowing
 - 1. Fédération Internationale des Sociétés d'Avion (FISA)
 - a. University Boat Race
- xxxvi. Rugby
 - 1. International Rugby League (IRL)
 - 2. World Rugby
 - 3. SANZAAR
- xxxvii. Sailing
 - 1. World Sailing
 - a. Americas Cup
 - b. Prada Cup Challenger Series
- xxxviii. Snooker
 - 1. International World Games Association (IWGA)
 - 2. World Pool-Billiard Association (WPA)
 - 3. World Professional Billiards and Snooker Association (WPBSA)
 - 4. World Snooker
- xxxix. Soccer
 - 1. International Federation of Association Football (FIFA)
 - 2. International Champions Cup
 - 3. NCAA
- xl. Soccer Beach
 - 1. Beach Soccer Worldwide (BSWW)
 - a. Beach Soccer World Cup
 - b. Beach Soccer Worldwide Intercontinental Cup
 - c. Euro Beach Soccer League
- xli. Special Events
 - 1. Academy of Motion Pictures Arts & Sciences
 - a. Academy Awards (Oscars)
 - 2. Academy of Television Arts & Sciences
 - a. Emmy Awards
 - 3. Major League Eating (MLE)
 - a. Nathan's Famous Hot Dog Eating Contest
 - b. Major League Eating Sanctioned Events
- xlii. Softball
 - 1. NCAA Division I Women's Softball
 - 2. Athletes Unlimited Softball
- xliii. Summer Athletics
 - 1. The Commonwealth Games Federation



Massachusetts Gaming Commission

- a. Commonwealth Games
 - 2. World Athletics (WA)
 - a. WA World Championships
 - b. WA Tour Events (Indoor/Outdoor)
 - c. WA Continental Tour Events
 - 3. European Athletics Association (EAA)
 - a. EAA Championships
 - 4. X-Games
- xliv. Swimming
 - 1. Fédération internationale de natation (FINA)
 - a. World Championships
- xlv. Table Tennis
 - 1. International Table Tennis Federation (ITTF) events
 - 2. TT Elite Series Poland
 - 3. TT Star Pro Series
 - 4. TT Trophy Hungary Tennis
- xlvi. Tennis
 - 1. Association of Tennis Professionals (ATP)
 - 2. International Tennis Federation (ITF)
 - 3. Women's Tennis Association (WTA)
 - 4. United States Tennis Association (USTA)
 - 5. World Team Tennis
 - 6. NCAA
- xlvii. Volleyball
 - 1. International Volleyball Federation (FIVB)
 - 2. Fédération Internationale de Volleyball (FIVB)
 - 3. NCAA
- xlviii. Beach Volleyball
 - 1. Association of Volleyball Professionals (AVP)
 - 2. Fédération Internationale de Volleyball (FIVB)
 - 3. Fédération Internationale de Volleyball (FIVB)
 - 4. NCAA
- xlix. Waterpolo
 - 1. Fédération internationale de natation (FINA)
 - a. FINA World Championships
 - b. FINA World Cup
 - c. FINA World League
 - 2. Ligue Européenne de Natation (LEN)
 - a. European Championships
 - b. LEN Champions League



Massachusetts Gaming Commission

- c. Adriatic League
 - 3. Italian Swimming Federation (FIN)
 - a. Italian Serie A1
- 1. Winter Athletics
 - 1. Fédération Internationale de Ski (FIS, International Ski Federation)
 - a. World Cup
 - b. Four Hills Tournament
 - 2. International Bobsleigh and Skeleton Federation (IBSF)
 - a. World Championship
 - 3. International Luge Federation (FIL)
 - a. World Championship
 - 4. International Skating Union (ISU)
 - a. World Cup
 - b. World Championship
 - 5. X-Games

Vote:



Massachusetts Gaming Commission

PPC

20 Kiosks on the Gaming Floor

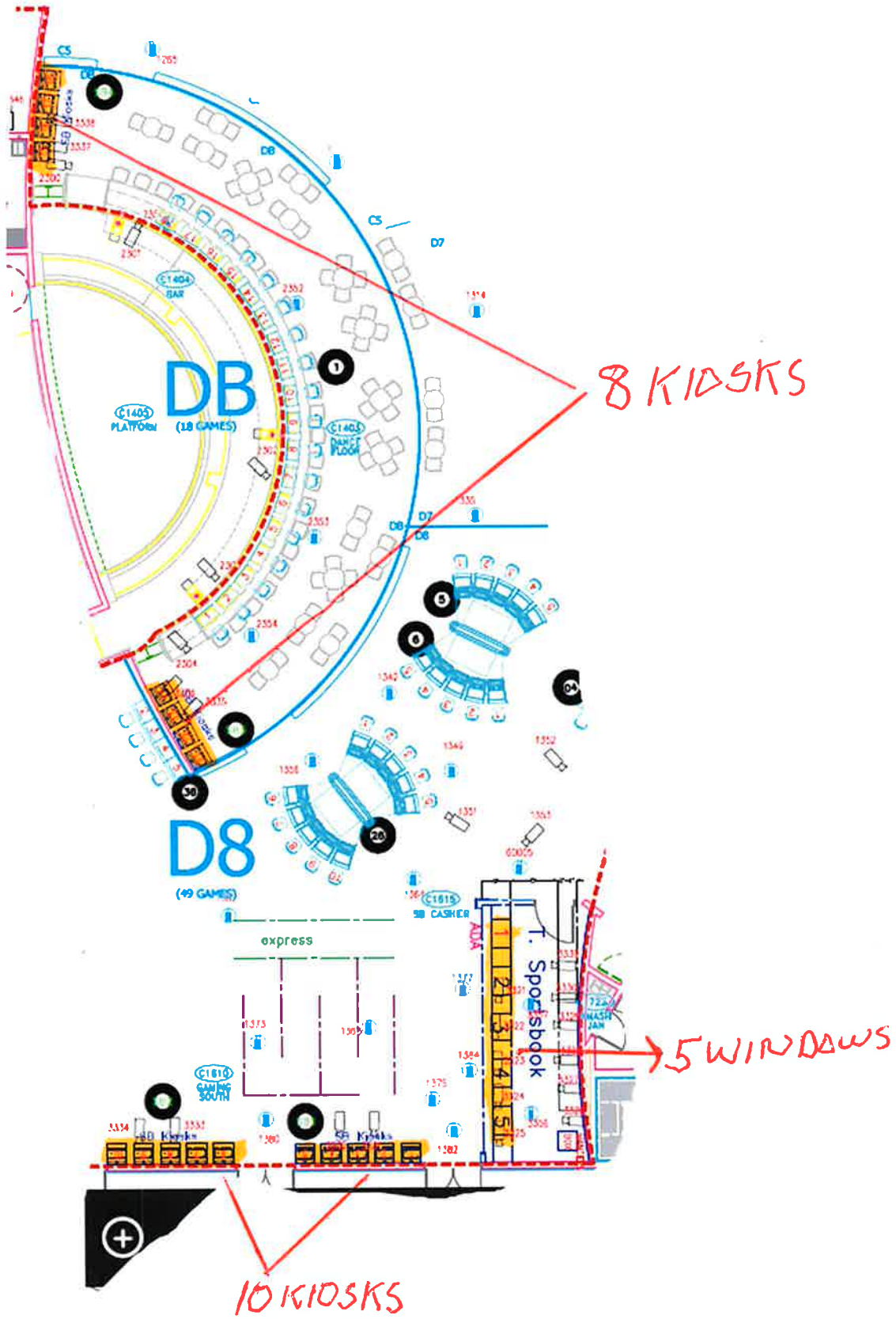
5 Windows

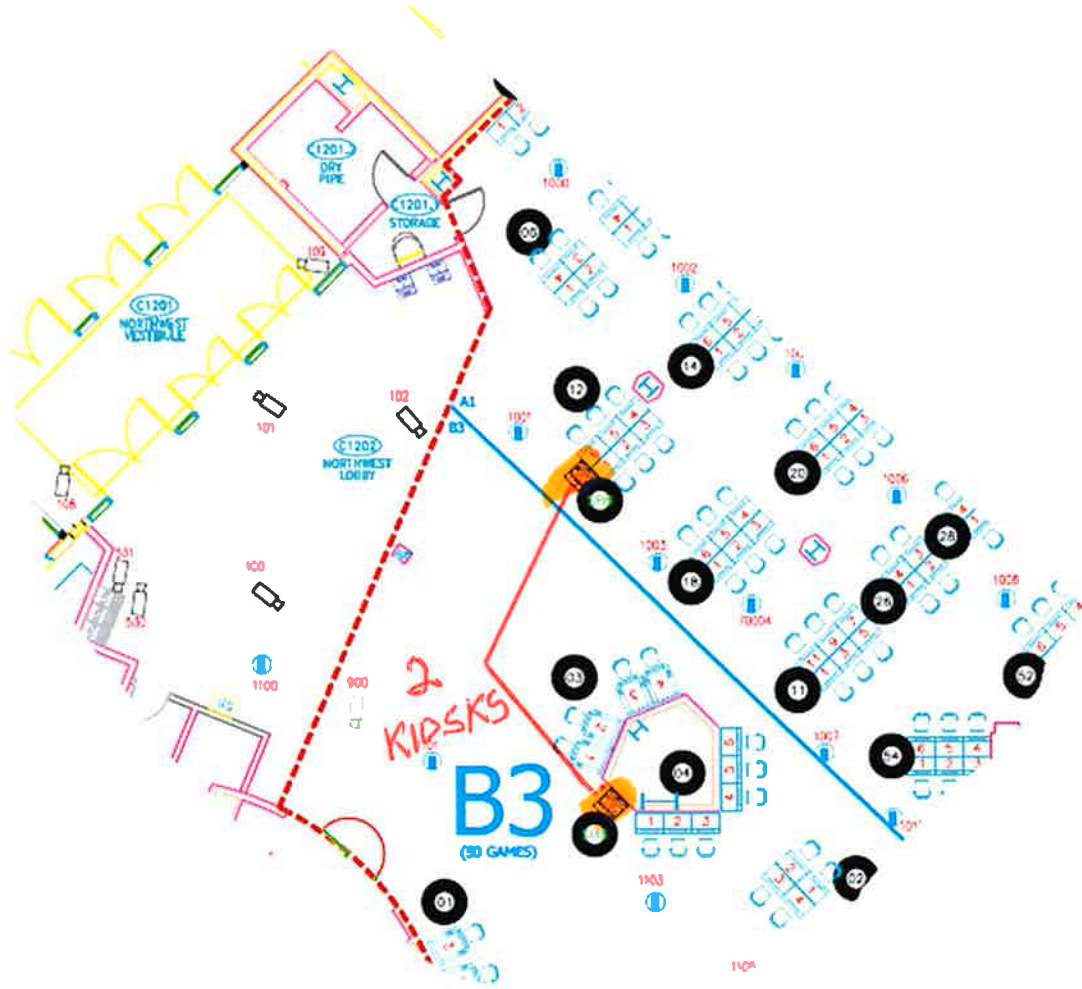
Temporary Betting Counter/Area:

- The area containing the temporary betting counter and wagering kiosks (excluding the 2 kiosks near Valet) is approximately 800 square feet.
- There are 20 SW Kiosks within our current approved Gaming Floor space (2 located near Valet, 4 on each side of the Revolution Lounge/bar, 10 against the wall to left of the temp betting counter).
- There are 5 Ticket Writer Windows in total, one of which is ADA accessible at the temp betting counter
- There is 1 designated location for a SW Managers Bank within the Temp Counter cage/space (under surveillance behind the ticket writer line)
- Our current Gaming Floor space square footage is 44,245 sq ft
- Current CAD of temp counter and gaming floor with ticket windows/kiosks/surveillance is attached for your reference.

Proposed Permanent Sports Wagering Area:

- The Flutie's location is not included in PPC's approved gaming square footage for our facility. PPC intends to obtain the MGC's approval in accordance with established regulations to include/add the square footage of Flutie's to our gaming space. Should the Commission grant an extension of the gaming area, the permanent wagering counter and kiosk space **within the area currently occupied by Flutie's** would be approximately 6,200 square feet.
- We expect to have 20 kiosks within this location and (4 -5) ticket writer stations, including one ADA along with food & beverage. All subject to change and subject to the approval of the MgC.
- Design Plans are expected to be finalized mid-February, PPC will provide a CAD with required information as soon as details are available.





MGM

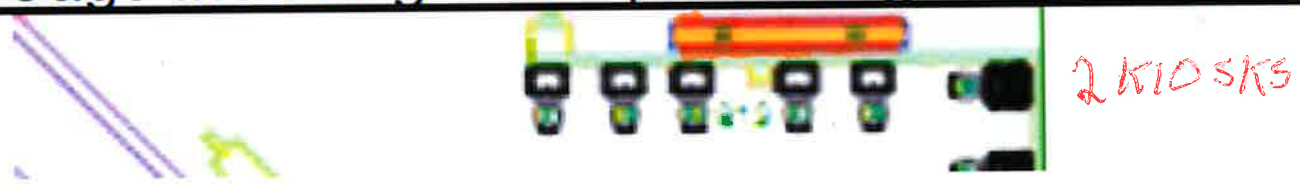
MGM Springfield		Sports	Kiosk	
Location/number		Serial Number		
SBADA	On wall near promo desk	7840046		
SB1	Right of Island Bar	143267038		
SB2	Right of Island Bar	143267033		
SB3	Right of Island Bar	143267007		
SB4	Right of Island Bar	143267037		
SB5	Front of Chip Bank	143267008		
SB6	Front of Chip Bank	143267023		
SB7	High Limit Slots	143267020		
SB8	Bunker One	143267015		
SB9	Bunker One	143267025		
SB10	On wall near promo desk	143267068		
SB11	On wall near promo desk	143267108		
SB12	On wall near promo desk	143267104		
SB13	Front of Chip Bank	143267120		
SB14	Bunker One	143267002		
SB 15	Bunker One	143267012		
SB 16	Bunker One	143267003		
SB 17	Bunker One	143267039		
18 Kiosk total	7 windows total			

Dear Commissioners:

Please acknowledge this letter, as a supplemental request by Blue Tarp reDevelopment, LLC dba MGM Springfield ("MGMS") to classify and incorporate the pre-approved "Gaming Area," approx. 88,000 sq ft of our Gaming Establishment, as also Sports Wagering area, under the new Mass General Laws 23N and 205 CMR 247.07 Acceptance of Sports Wagers, as well as recently updated 205 CMR 138.07 Floor Plans.

This request still falls within the areas posed above and in our previous correspondence, but would add two more in-person terminals for sports wagering, that we would place and operate from our High Limit Cage. This area being previously constructed to meet the criteria of an imprest Cage, meets all the similar requirements of a Sports Wagering Counter, while offering the operational benefit of additional Sports Wagering locations during peak periods. We understand and share MGC's forethought to preventing potential crowding, or even public safety concerns and see this as one more measure to control same.

High Limit Cage Including Two Sports Wagering Terminals



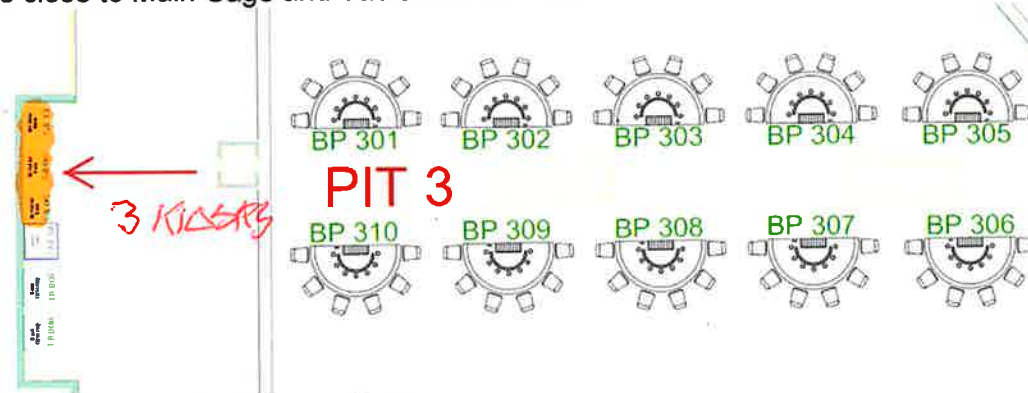


MGM SPRINGFIELD
ONE MGM WAY
SPRINGFIELD, MA 01103

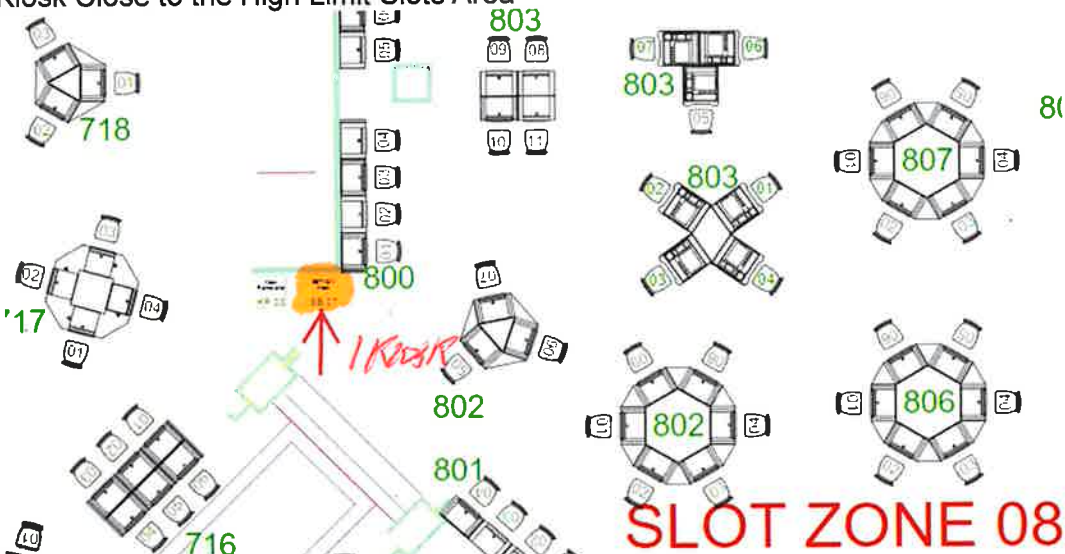
413.273.5000
MGMSPRINGFIELD.COM

Sports Wagering Kiosks in Other Gaming Area Positions

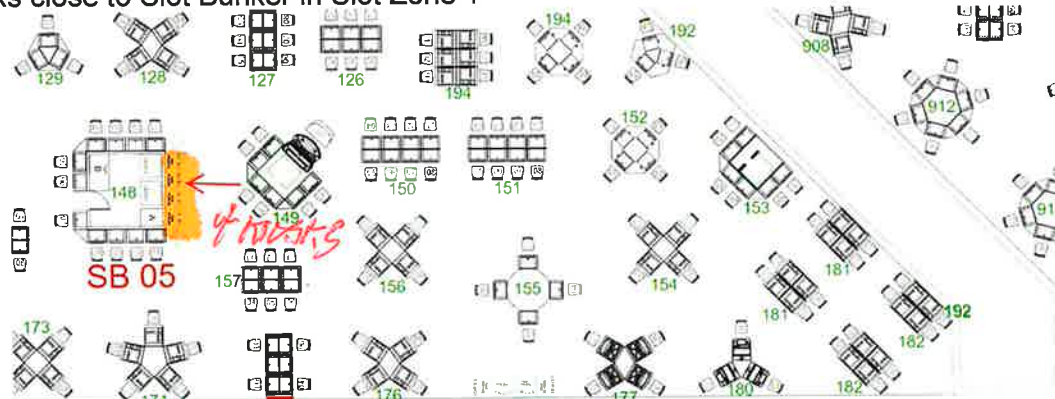
Kiosks close to Main Cage and Table Games Pit 3



One Kiosk Close to the High Limit Slots Area

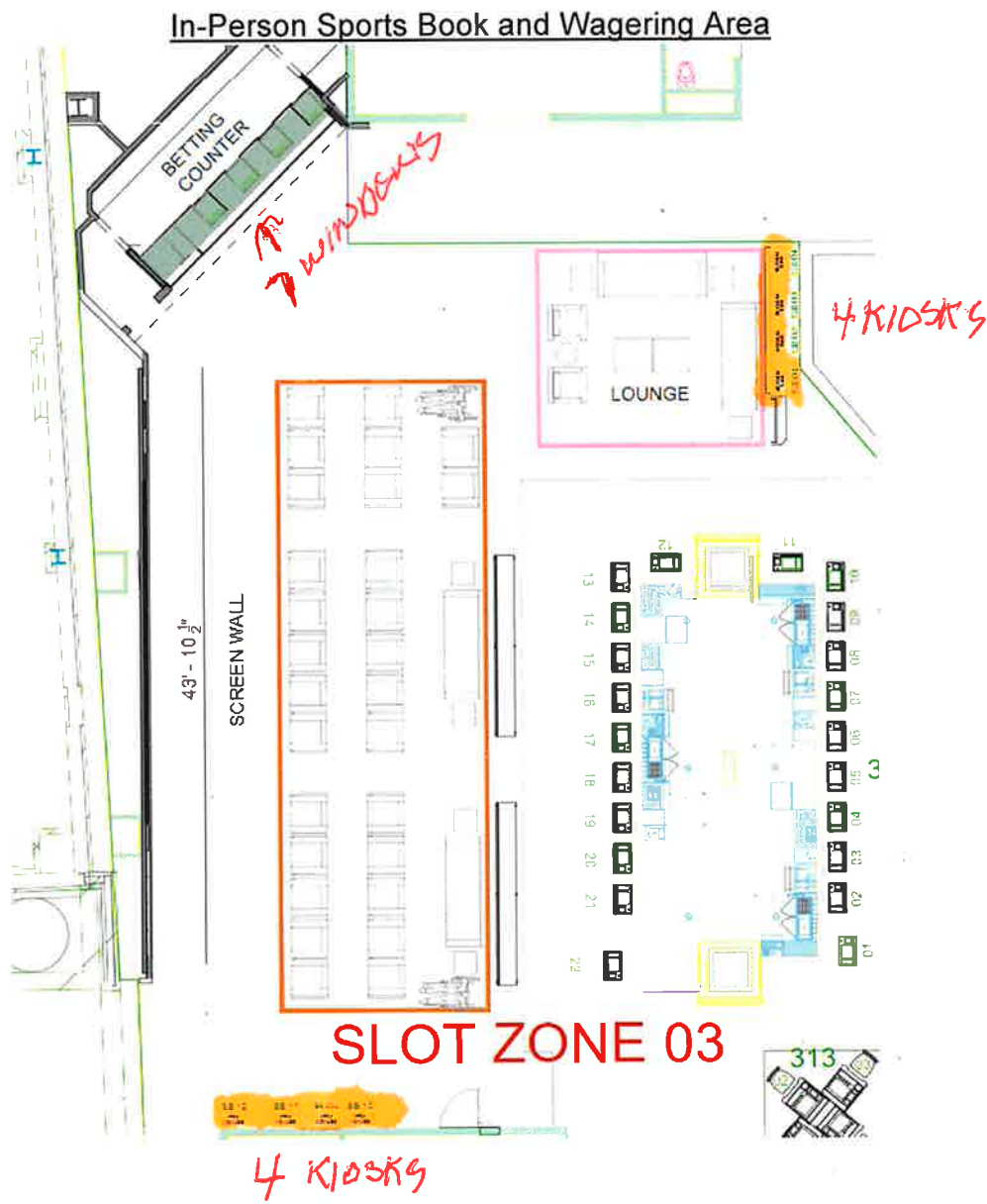


Kiosks close to Slot Bunker in Slot Zone 1





MGM SPRINGFIELD
ONE MGM WAY
SPRINGFIELD, MA 01103
413.273.5000
MGMSPRINGFIELD.COM



Encore

Attached please find the following:

1. A depiction of the proposed new Sports Wagering Areas as follows:
 - a. 111 square feet located adjacent to On Deck.
 - b. 832 square feet located on Parking Level B-1.
2. The addition of the new Sports Wagering Areas (as described above) will result in the addition of 943 square feet of Sports Wagering Area.

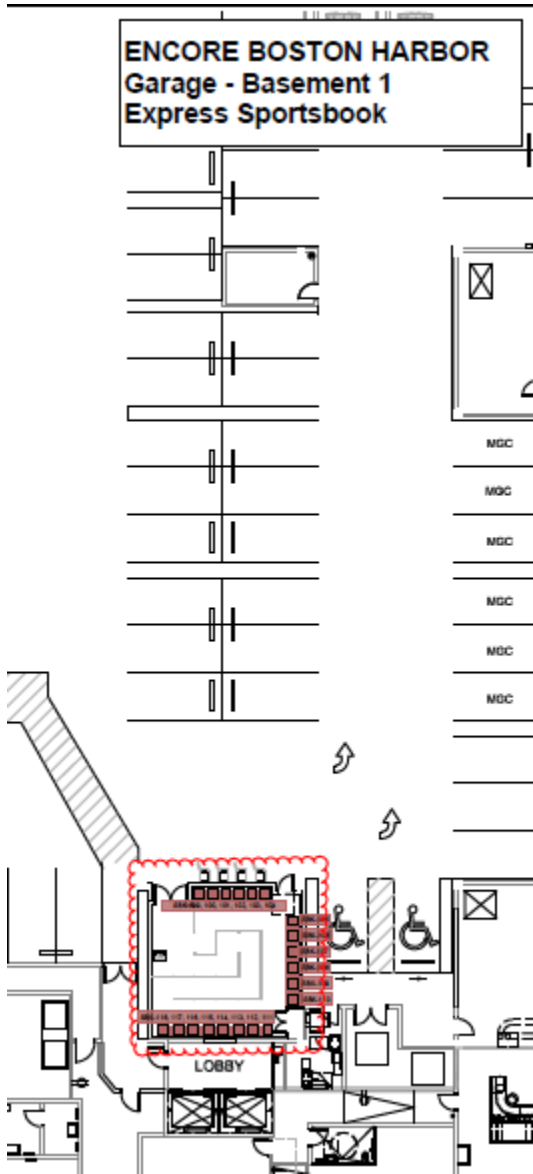
The reconfiguration of the elevator lobby area will result in a reduction of gaming area of 162 square feet.

As a result of these additions/subtractions, the total Gaming Area will increase from 211,190 square feet to 211,971 square feet.

Please see Attachment 1, 2, and 3 for a depiction and Attachments 4, 5, and 6 for changes to the Gaming Area perimeter.

3. New CCTV camera coverage has been updated for approval by the Investigations and Enforcement Bureau.
4. As set forth on the attached plans, the total number of Sports Wagering kiosks is 118.
5. 10 Betting windows in the Sports Book

Please let me know if there is anything else that you need at this time.



SECOND LEVEL



