



REVISED NOTICE OF MEETING AND AGENDA

Pursuant to the Massachusetts Open Meeting Law (G.L. c. 30A, §§ 18-25), and St. 2025, c. 2, notice is hereby given of a public meeting of the **Massachusetts Gaming Commission**. The meeting will take place:

Thursday | November 6, 2025 | 10:00 a.m.

VIA REMOTE ACCESS: 1-646-741-5292

MEETING ID/ PARTICIPANT CODE: 111 576 0713

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 - #571

1. Call to Order – Jordan Maynard, Chair

2. Meeting Minutes

- | | |
|---------------------|-------------|
| a. November 2, 2023 | VOTE |
| b. February 1, 2024 | VOTE |
| c. August 29, 2024 | VOTE |
| d. October 9, 2025 | VOTE |
| e. October 16, 2025 | VOTE |



Massachusetts Gaming Commission

3. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. Presentation of report, “AI and Player Risk Identification and Response Research Report” – Kasra Ghaharian, Ph.D., Director of Research, International Gaming Institute, University of Nevada Las Vegas
 - b. AI Workgroup Update
 - i. Executive Session **VOTE**
 The Commission anticipates that it will meet in executive session in accordance with G.L. c. 30A, § 21(a)(7) and G.L. c. 23N, § 6(i) to discuss trade secrets, competitively sensitive or proprietary information related to use of technology applications in connection with the requirements of 205 CMR 257.02(4) as provided by operator licensees to the Commission, the disclosure of which would place the operators at a competitive disadvantage or would be detrimental if made public.
4. Community Affairs Division – Joe Delaney, Division Chief of Community Affairs
 - a. Plainridge Park Casino Quarterly Report
 - b. Request to Re-allocate unexpended 2018 CMF Grant Funds – Attleboro **VOTE**
 - c. Request to Re-allocate unexpended 2022 CMF Grant Funds – Longmeadow **VOTE**
 - d. Request to Re-allocate unexpended 2023 CMF Grant Funds – Wilbraham **VOTE**
 - e. FY2027 Community Mitigation Fund Guidelines **VOTE**
5. Legal – Justin Stempeck, Interim General Counsel
 - a. Review of DraftKings’ corrective action plan as required by the Commission’s July 7, 2025 Non-Compliance Decision
 - b. 205 CMR 146.13: Blackjack Table; Card Reader Device; Physical Characteristics; Inspections - Discussion and Review of Regulation Amendments and Amended Small Business Impact Statement for final adoption by Commission - Judith Young, Associate General Counsel **VOTE**
 - c. (b) 205 CMR 238.48: Expiration of Sports Wagering Tickets and Vouchers; Payment to the Sports Wagering Control Fund – Discussion and Review of Regulation Amendments and Amended Small Business Impact Statement for final adoption by Commission - Autumn Birarelli, Staff Attorney **VOTE**



Massachusetts Gaming Commission

6. Investigations and Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
- a. Briefing on noncompliance matter related to Temporary Category 3 Sports Wagering Licensee Bally’s Interactive LLC, d/b/a Bally’s and discussion regarding next steps. Alleged noncompliance relates to Bally’s offering prohibited wagers in violation of G.L. c. 23N, § 3, 205 CMR 247.01(2)(a)(2) and the Massachusetts Sports Wagering Catalog – Nathaniel Kennedy, Enforcement Counsel
 - b. Discussion regarding RSM waiver request in connection with Statement of Work
- VOTE**

7. Sports Wagering Division – Carrie Torrisi, Division Chief of Sports Wagering
- a. Plainridge Park Casino House Rules Update
- VOTE**

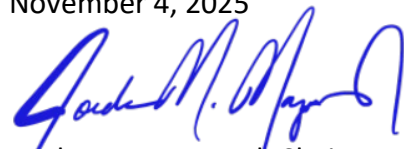
8. Finance – Derek Lennon, Chief Financial and Accounting Officer
- a. MGC Diversity Update – John Scully, Finance and Budget Office Manager
 - b. FY202~~7~~⁶ Cost of Living Adjustment (COLA)
- VOTE**

9. Commissioner Updates

10. 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: November 4, 2025 | 10:00 a.m. EST | **REVISED 11/5 @ 10:30 a.m.**

November 4, 2025



Jordan M. Maynard, Chair

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



Massachusetts Gaming Commission

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Massachusetts Gaming Commission

Meeting Minutes



Date/Time: November 2, 2023, 10:00 a.m.

Place: MassMutual Center – Meeting Rooms 1 & 2
1277 Main Street
Springfield, MA 01103

And VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 613 9654

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

Commissioners Present:

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

1. [Call to Order](#) (0:14)

Chair Cathy Judd-Stein called to order the 485th Public Meeting of the Massachusetts Gaming Commission ("Commission"). All five Commissioners were present for the meeting.

2. [Minute Minutes](#) (0:35)

Commissioner Maynard moved that the Commission approve the minutes from the February 23, 2023 and the February 27, 2023 public meetings as included in the Commissioners' Packet, subject to any necessary corrections for typographical errors or non-material matters. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

*Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Maynard: Aye.
Chair Judd-Stein: Aye.
The motion passed unanimously, 5-0.*

3. [Administrative Update](#) (1:52)

Interim Executive Director and General Counsel Todd Grossman greeted the Commission and introduced Director of Racing and Chief Veterinarian Dr. Alex Lightbown to provide an update on the Massachusetts Sire Stakes race.

a. [Massachusetts Sire Stakes Update](#) (2:21)

Dr. Lightbown summarized the successful Sire Stakes season at Plainridge Park Racecourse. She emphasized the wide variety of owners, trainers, and drivers who benefited from the program.

4. [Legislative Update](#) (4:42)

Commissioner Hill stated that he did not have a Legislative Update at this time.

Transcriber's Note: Agenda Item 5 was struck from the revised agenda.

6. [Sports Wagering](#) (4:51)

a. [Fanatics: Update to House Rules](#) (5:12)

Casino Regulatory Manager and Interim Sports Wagering Operations Manager Andrew Steffen introduced the House Rules Update from Fanatics. The updates included minor changes to general betting rules and basketball rules as well as slight clarifications to their tennis rules. *A memorandum and the House Rules Update from Fanatics can be found on pages 21-29 of the Commissioners' Packet.* Manager Steffen stated that after a full review of these changes, the Sports Wagering Division had no reservations about approving these changes.

Commissioner Hill moved that the Commission approve the updates to Fanatics House Rules as included in the Commissioners' Packet and discussed here today. Commissioner Skinner seconded the motion.

*Roll call vote:
Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Maynard: Aye.
Chair Judd-Stein: Aye.
The motion passed unanimously, 5-0.*

Before moving on to the next Agenda Item, Chair Judd-Stein recognized MGM Springfield's (MGM) representative on the Gaming Policy Advisory Committee (GPAC) Paul Picknelly to give some remarks.

Mr. Picknelly stated that MGM was investing in construction in Springfield and sponsoring and hosting community events in the area. He explained that he was proud of MGM's investments and achievements.

7. Finance (18:11)

a. FY24 Budget Update (18:54)

Chief Financial and Accounting Officer Derek Lennon presented the Q1 FY24 Budget Update. He summarized the update and decision-making process and explained requested changes in the quarterly budget to the Gaming Control Fund, Racing Oversight Trust Fund, and Sports Wagering Control Fund. *A memorandum on the Q1 FY24 Budget Update can be found on pages 30-38 of the Commissioners' Packet.*

Commissioner Hill asked if the proposed changes would cover a two-year window before the Commission would have to make cuts or changes to the process. Chief Lennon stated that the proposal before the Commission could cover a multi-year period.

Commissioner O'Brien stated that she and Commissioner Skinner had discussed potential options including legislative intervention. She suggested further research on possible legislative solutions.

Chair Judd-Stein emphasized the impact of Covid on declining revenues and increasing costs. Commissioner O'Brien added that she had observed that the racecourse costs were necessary. Commissioner Maynard agreed that Dr. Lightbown and her team were doing the best they could with the resources they had. Commissioner Skinner thanked the Finance Division for the work they've done to address the issue.

Commissioner O'Brien stated that considerations should include third-party vendor costs and ongoing tracking of advertising in addition to personnel.

Commissioner Skinner moved that the Commission revise the FY24 Budget as included in the Commissioners' Packet and discussed here today. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

8. Racing (46:42)

a. Discussion of Race Horse Development Fund Benefits for Drivers and Jockeys in accordance with G.L. c. 23K, § 60(c)(iii) (48:00)

Dr. Lightbown summarized the public comments received in connection with Race Horse Development Fund benefits and the amount that should be paid to drivers and jockeys. She noted that the Commission had received sufficient information to determine an appropriate allocation for the Thoroughbred Sportsman's Organization, the Thoroughbred Jockeys' Organization, and the Standardbred Horsemen's Organization, which she reviewed. She acknowledged that the demand for funding was greater than the funds available. *A memorandum and other materials regarding the Racehorse Development Fund Benefits for Drivers and Jockeys can be found in the Commissioners' Packet on pages 39-77.*

Interim Executive Director and General Counsel Grossman stated that the Commission's discussion should center on the 4% of funds in the Race Horse Development Fund that are set aside for welfare and health benefits. He explained how thoroughbred jockeys and standardbred drivers received these funds. He noted the Commission could determine whether to provide any additional funds, beyond the already allocated 4%, on the standardbred side. He stated that the Jockeys' Guild has been recognized by the Commission and administered these funds in the past on the thoroughbred side. Counselor Grossman added that the Commission was responsible for determining the need for these funds.

Commissioner Hill moved that under G.L. c. 23K, § 60(c)(iii), zero dollars shall be paid to the Harness Horseman's Association of New England for the reasons discussed here today. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

Commissioner Skinner moved that the Jockeys' Guild be recognized as a thoroughbred jockey organization referred to in G.L. c. 23K, § 60(c)(iii). Commissioner Maynard seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

Dr. Lightbown recommended that \$1,000 be paid to eligible members of the Jockeys' Guild and that the Commission make a retroactive payment in the same amount for the previous year. Commissioner Skinner stated that she was comfortable with the recommendation as the Commission awarded the same amount in 2021.

Commissioner O'Brien moved that under G.L. c. 23K, § 60(c)(iii), the following amounts shall be awarded through the Jockeys' Guild to jockeys who are eligible under the requirements of the guild: \$1,000 per qualifying jockey for 2022 and the same \$1,000 per qualifying jockey for 2023. Commissioner Maynard seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

Transcriber's Note: The Commission took a break at [1:06:59](#) and returned at [1:25:23](#).

9. [Research and Responsible Gaming](#) (1:25:59)

a. [FY23 Research Agenda Summary](#) (1:27:50)

Director of Research and Responsible Gaming Mark Vander Linden and Research Manager Dr. Bonnie Andrews presented recommendations from the FY23 Research Agenda. Topics included the following: the FY23 Research Agenda, background on the Expanded Gaming Act and past research agendas, approach, community engaged research, recommendations, and social and economic impact.

Chair Judd-Stein stated that she appreciated the research and asked who the research agenda should be sent to next. She suggested that the research team compile a list of recipients, including the Massachusetts Municipal Association, in addition to the Legislature and Appointing Authorities.

Commissioner O'Brien suggested that the research be sent to the various Commission subcommittees to get further input on how to implement the recommendations and to help create a list of agencies that should be involved. Chair Judd-Stein added that key stakeholders should be involved in the next steps to push out the Research Agenda.

Commissioner Hill asked Commissioner O'Brien if the Public Safety Subcommittee collaborates with the Massachusetts Police Chiefs. Commissioner O'Brien responded that they have a participating member on the subcommittee as well as a representative from the District Attorney's Association which helps to get information out the necessary individuals.

Chair Maynard stated that he saw many recommendations in the presentation that would fall into the Public Safety Subcommittee's work. He emphasized the importance of collaborating with local municipalities and building awareness about new resources.

10. [Community Affairs Division](#) (1:56:54)

a. [MGM Springfield Q2 & Q3 Quarterly Report](#) (3:21:44)

Transcriber's Note: This agenda item was discussed after agenda item number 13(a).

Chair Judd-Stein recognized Vice President and Legal Counsel Augustine Kim and President of MGM Springfield Chris Kelly who gave some prepared remarks before the Commission. VP Kim introduced the rest of the MGM team: Vice President of Finance Arlen Carballo, Director of Compliance Daniel Miller and Director of Community Affairs and Public Relations Beth Ward who all presented the Q2 and Q3 2023 Quarterly Report. Topics included the following: updates on gaming and sports wagering revenue and taxes, the lottery and diversity and local spend for Q2 and Q3 2023, compliance for Q2 and Q3 2023, 2023 Employment Numbers, Q2 & Q3 2023 Employee Hiring Initiatives, Community Outreach and Special Events in Q2 & Q3 2023, and Upcoming Entertainment. *The quarterly report presentation and quarterly reports can be found in the Commissioners' Packet on pages 104-153*

Commissioner Hill asked how to bring people into the brick-and-mortar establishments as opposed to engaging in sports wagering online. Director Miller responded by stating that he viewed sports wagering as an opportunity to bring patrons into establishments to watch games. He added that he was unable to directly answer the question but was confident that there were efforts to increase revenue at brick-and-mortar establishments and would get back to the Commission with more information.

b. [Continued Discussion of Modifications to Community Mitigation Fund](#) (1:57:07)

Chief of Community Affairs Joe Delaney summarized comments received from the public hearing on the draft Community Mitigation Fund guidelines and the FY25 Municipal Block Grant Formula. *A memorandum summarizing the public comments received and copies of written comments can be found in the Commissioners' Packet on pages 154-156*

Commissioner Hill asked how the Division of Community Affairs decided on the number in the block grants for administrative expenses. Chief Delaney responded that the percentage allocated to administrative expenses was based on an evaluation of other block grants. He added that an increase in funds for administrative expenses would reduce funds for other projects.

Commissioner Maynard asked about Medford Mayor Breanna Lungo-Koehn's recommendation that the \$50,000 cap on administrative expenses be lifted. Chief Delaney responded that the Mayor had recommended that there be no cap but the 7.5% of the total grant amount would remain. He added that the Commission had a waiver process should a community request more than \$50,000 for such expenses.

Commissioner Hill asked if any changes made in the meeting on this topic would have to go back out for public comment. Chief Delaney stated that this matter would not be materially impacted by public comment.

Commissioner Hill stated that he was not inclined to raise the \$50,000 cap. Commissioner Maynard agreed that the Mayor Lungo-Koehn has the opportunity to explain why her community would need additional funds for personnel and other administrative matters. He stated that he would not like to change it in order to move the program forward. Commissioner Skinner added that the waiver process would be impactful for many communities.

c. Report on Community Mitigation Fund Awards to Region B and the City of Springfield (2:05:35)

Chief Delaney presented the request from the City of Springfield to revisit the grant distribution formula so that Springfield would receive a larger share of the available funds. He stated should the Commission decide to make changes to the distribution formula, that it should go through the public comment process.

Commissioner Hill stated that the Springfield could come back to the Commission after the initial year using the block grant formula and stated that he would not like to see the formula changed at this time.

Commissioner Skinner stated that the Commission will refine the guidelines over the following years. She stated that she was sympathetic to the arguments made on behalf of the communities and believed that the waiver process would be helpful in the future. She asked for clarification on the waiver process. Chief Delaney responded that the funding for FY25 was captured completely in what was allocated through the formula, and the waiver process would be used for any excess funds requested.

Commissioner Maynard stated that the Commission had a history of taking on challenging decisions and allocating funding for projects that would significantly benefit communities surrounding the casinos.

Chair Judd-Stein re-emphasized that the formula was a one-year test and that she did not want to disrupt the timetable of the Community Mitigation Fund program.

Chief Delaney presented the City of Revere's request for an additional \$200,000 and that the Commission consider the traffic on Route One as part of the casino impacts on Revere. Regarding consideration of Route One traffic, Chief Delaney stated that in the final guidelines, the Commission chose not to include traffic that goes on a limited access highway such as Route One. He further explained, regarding the request for an additional \$200,000, that designated surrounding communities receive this additional amount, but Revere had not petitioned to qualify as a designated surrounding community.

Commissioner O'Brien asked if the proposed expansion of Encore Boston Harbor and impacts resulting from that expansion would give Revere an opportunity to petition for this change.

Commissioner Skinner that Revere would need to bring new information related to the impacts to reopen the question and create a new designated surrounding community. Chair Judd-Stein stated that there was an option for Revere to approach the Legislature with this issue, and she asked the Legal Division to address it.

Commissioner Skinner stated that she did not think that the current request should be granted. Commissioner Maynard stated that he was worried about setting a precedent for other communities, although he was empathetic. Commissioner Hill agreed.

Chief Delaney summarized the opinion of the Commission, which was to move forward with the current proposal for Revere and see if there was a reasonable solution through the Legal Division.

Chief Delaney next presented a request from the City of Chelsea to allow other entities to apply for workforce grants. He stated that the Commission only offered one workforce grant per region but that multiple entities could be considered if they were part of a regional consortium.

Commissioner Skinner asked what other kinds of entities Chelsea was referring to. Chief Delaney responded that in the past, joint workforce grants have been executed.

Chief Delaney presented the City of Northampton's request for more leeway to decide how money should be spent. Chief Delaney noted that there was a lot of leeway in how the money can be spent as long as there is a casino-related impact.

Lastly, Chief Delaney presented the City of Cambridge's request for traffic-related monies. He noted that no studies indicated that there were any material impacts from casinos on the streets in Cambridge.

Chair Judd-Stein stated that the Commission recommends the status quo with regard to the Community Mitigation Fund guidelines.

Chief Delaney summarized some successful projects funded through the Community Mitigation Fund, particularly in the Springfield area.

11. [Executive Director Screening Committee](#) (2:34:18)

a. [Update on Process](#) (2:34:39)

Commissioner O'Brien reported that the Executive Director Screening Committee met to begin the resume review process. She wanted more information about the status of the executive search firm recruiting. She stated that the posting would remain open until the end of November.

12. [IEB Director Screening Committee](#) (2:36:33)

a. [IEB Director Job Description Review](#) (2:36:48)

Commissioner Skinner stated that the purpose of the discussion was to refine the job description for the IEB Director. She asked the Commissioners for feedback and edits.

Commissioner O'Brien asked that the statutory reference to the title in G.L. c. 23K be included in the description. Commissioner Skinner stated that the description would be sent to the subcommittee before it was posted internally for 30 days and externally for 45 days.

Commissioner O'Brien moved that the Commission approve the job description for the Director of the Investigations and Enforcement Bureau as included in the Commissioners' Packet and discussed here today. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

13. [Commissioner Updates](#) (2:42:57)

a. [Independent Monitor Report Schedule Update](#) (2:42:59)

Chair Judd-Stein summarized the purpose of the independent monitor on Wynn MA, LLC. Commissioner O'Brien stated that the five-year monitorship was almost over and that the Commission would receive a report at that time.

Transcriber's Note: The Commission took a break at [2:45:36](#) and returned at [3:21:26](#).

14. [Other Business](#) (4:11:53)

Upon inquiry from Chair Judd-Stein, no other business was noted.

Commissioner O'Brien moved to adjourn. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0. The meeting was adjourned

List of Documents and Other Items Used

1. [Amended Notice of Meeting and Agenda](#), dated November 1, 2023.

2. [Commissioners' Packet from the November 2, 2023 meeting](#) (posted on massgaming.com).



Massachusetts Gaming Commission Meeting Minutes

Date/Time: February 1, 2024, 10:00 a.m.
Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 112 501 1403

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

Commissioners Present:

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

1. [Call to Order](#) (00:04)

Chair Judd-Stein called to order the 498th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

2. [Meeting Minutes](#) (01:03)

a. [March 23, 2023](#) (01:27)

Commissioner Maynard moved that the Commission approve the minutes from the March 23, 2023 public meeting included in the Commissioners' Packet, subject to any necessary corrections for typographical errors or any other non-material matters. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

Commissioner Hill: *Aye.*

Commissioner Skinner: Aye.
Commissioner Maynard: Aye.
Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

b. [April 13, 2023](#) (01:59)

Commissioner Maynard moved that the Commission approve the minutes from the April 13, 2023 public meeting included in the Commissioners' Packet, subject to any necessary corrections for typographical errors or any other non-material matters. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Maynard: Aye.
Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

c. [April 25, 2023](#) (02:41)

Commissioner Maynard moved that the Commission approve the minutes from the April 25, 2023 public meeting included in the Commissioners' Packet, subject to any necessary corrections for typographical errors or other non-material matters. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Maynard: Aye.
Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

d. [May 4, 2023](#) (03:23)

Commissioner Maynard moved that the Commission approve the minutes from the May 4, 2023 public meeting included in the Commissioners' Packet, subject to any necessary corrections for typographical errors or other non-material matters. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

Chair Judd-Stein noted that she voted to the extent to which she was present at the May 4, 2023 public meeting.

3. [Administrative Update](#) (05:01)

a. [IEB Gaming Division's End of Year Report: DOR Intercepts and Recovery of other Financial Gaming Obligations, and Charity Contributions](#) (05:50)

Investigation and Enforcement Bureau ("IEB") Gaming Agent Division Chief Burke Cain presented IEB's Gaming Division End of the Year Report on the Financial Gaming Obligations in 2023 and as compared to 2022. *The presentation information was found on pages 65-66 of the Commissioners' Packet.*

Commissioner Skinner asked where the expired vouchers, lost and found, unclaimed jackpots, and underage forfeiture funds ended up. Chief Cain stated that they went to the Commission's Gaming Revenue Fund at the expiration of 365 days.

Commissioner Hill noted his shock regarding the amount of money collected and the number of people not following the regulations.

b. [Human Resources Division's Update: Onboarding Policies and Practices](#) (13:10)

Chief People and Diversity Officer David Muldrew briefly described the Commission's onboarding project, which attempted to create a more robust onboarding program designed by each department.

4. [Legislative Update](#) (16:47)

a. [Governor's Budget Proposal Impacts](#) (17:01)

Commissioner Hill introduced discussion of the Governor's House 2 Budget Recommendations for Fiscal Year 2025, noting that there was a specific provision which affected the Commission.

Chief Financial and Accounting Officer Derek Lennon reviewed the Governor's House 2 Budget Recommendation for Fiscal Year 2025, *a memorandum on which was found on pages 67-71 of the Commissioners' Packet.* He specifically discussed the proposed redistribution of Category 1 licensee gaming taxes in Section 88 of the Governor's recommendations.

Commissioner O'Brien asked what proportion of monies in the Public Health Trust Fund went to the GameSense program versus research. Chief Lennon stated that it was close to a 50-50 split.

Chief Lennon noted that removing funding for the Race Horse Development Fund would lead to a significant reduction in the purses. Chair Judd-Stein asked how the proposed budget would impact the possibility of creating another racetrack for thoroughbred racing. Chief Lennon stated that the proposed budget would have limited impact on thoroughbred racing because the balance in the Race Horse Development Fund was primarily designated for purses.

Commissioner Hill stated that the Executive Office of Administration and Finance was looking for recommendations from the Commission and was open to having a conversation about the budget. He asked how the Commission wanted to communicate with the leaders of the House and the Senate about the proposed budget changes.

Commissioner O'Brien proposed providing the recitation described by Chief Lennon, which would contrast the budget numbers with those from Fiscal Year 2023, to the Executive Office of Administration and Finance. Commissioner Hill noted that the Legislature had not yet seen the letter that was recently sent by the Commission. Commissioner Skinner agreed with Commissioner O'Brien and asked what the timing of the process would be. Commissioner Hill noted that the information needed to be distributed sooner than later. Chair Judd-Stein asked if the Commission should gather the information, draft a letter with the Executive Director's signature, and forward those assembled documents to the appropriate parties. Commissioner Hill stated that the Commission followed the same process in the prior year.

Chair Judd-Stein acknowledged that iLottery was in the proposed budget and asked if the Commission had a research project dealing with iLottery impacts. Director of Research and Responsible Gaming Mark Vander Linden stated that while there were studies on lottery impacts, none dealt with iLottery impacts.

5. [Legal](#) (45:02)

- a. [205 CMR 257: Sports Wagering Data Privacy– Discussion and Review of the Amended Regulation and Small Business Impact Statement for authorization to begin the promulgation process.](#) (5:12:30)

Transcriber's note: The discussion of this Agenda Item was tabled to a different meeting.

- b. [Waiver from 205 CMR 221.01\(1\): Sports Wagering License Fees](#) (45:30)

Deputy General Counsel Carrie Torrisi presented the proposed waiver from the requirements of 205 CMR 221.01(1), *a memorandum on which is found on pages 86-89 of the Commissioners' Packet.*

Commissioner Hill moved that in accordance with 205 CMR 202.03(2), the Commission issue a waiver to all licensed Sports Wagering Operators from the requirements outlined in 205 CMR 221.01(1) until such time as the amended 205 CMR 221 on which the Commission voted to begin the promulgation process on January 18, 2024 goes into effect as granting the waiver meets the requirements specified in 205 CMR 102.03(4) and is consistent with the purposes of G.L. c. 23N. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

6. [Sports Wagering Division](#) (49:06)

a. [Review of Customer Service Offerings Among Sports Wagering Operators](#) (50:00)

Sports Wagering Business Manager Crystal Beauchemin provided an overview of the customer service offerings among Sports Wagering Operators. *See pages 90-93 of the Commissioners' Packet.*

Chair Judd-Stein reminded everyone that this review originated from WSI US, LLC d/b/a WynnBet ("WynnBet") and the recognition that it offered less customer service options than initially anticipated. She asked for an explanation of the high-level findings in the review. Ms. Beauchemin stated that the key takeaway from the review was that there were only two Operators offering phone customer service. She added that LiveChat was the most utilized customer service option and was one of the most consistent offerings among the Operators. She further stated that the Operators did not promise customer service offerings in their applications but still offered them.

Commissioner Hill stated that after seeing the data on the times of the incoming phone calls, he was comfortable with the information provided. Commissioner O'Brien asked if any consumer complaints reached the Commission directly. Ms. Beauchemin stated that there were only 62 complaints received related to customer service generally, with some complaints addressing the lengthy response times. Commissioner O'Brien stated her concern that customers receive some action by the Operator when they experience an issue with their account. Ms. Beauchemin said that the Operators triaged the calls that came in outside of available customer service hours, and there was a 24/7 customer service aspect offered in Massachusetts.

Commissioner Skinner agreed with Commissioner O'Brien on the need to monitor customer complaints. Chair Judd-Stein noted that discussions around Sports Wagering Operator applications were available online if there was a need to reference them. Commissioner Maynard encouraged the patrons to let the Commission know about any issues they were experiencing.

b. Fanatics Betting & Gaming (Fanatics) Request for New Markets

i. [X Team's Next Head Coach](#) (1:45:00)

Transcriber's note: Discussion of Agenda Item 6(b)(i) occurred after the discussion of the Agenda Item 6(b)(ii).

Sports Wagering Operations Manager Andrew Steffen introduced a request from Fanatics to add an additional market for X Team's Next Head Coach to the Event Catalog to allow wagers on who will be a specified team's next head coach. *A memorandum regarding this agenda item was found on pages 96-97 of the Commissioners' Packet while the petition was found on pages 1-4 of the Additional Meeting Materials II.*

Chair Judd-Stein expressed the same issues raised in the discussion of Agenda Item 6(b)(ii). Mr. Steffen stated that the Sports Wagering Division did not make any recommendations to the Commission on this petition. Chair Judd-Stein stated that the Commission was prioritizing integrity and was not ready to take a vote at the time. Commissioner Hill asked Fanatics Senior Regulatory Counsel Michael Levine to return in front of the Commission with safeguards developed around the requests.

ii. [Player X Next Team](#) (1:23:13)

Transcriber's note: Discussion of Agenda Item 6(b)(ii) occurred before the discussion of the Agenda Item 6(b)(i).

Mr. Steffen introduced a request from Fanatics to add an additional wager category for Player X Next Team to the Event Catalog to wager on which team a specified player will play for in the next season. *The petition was found on pages 1-4 of the Additional Meeting Materials I and the memorandum was found on pages 94-95 of the Commissioners' Packet.*

Commissioner Maynard asked the Commission's Legal Division if the request would fall under the definition of Sports Wagering in G.L. c. 23N. Interim Executive Director and General Counsel Todd Grossman stated that it would since the definition of Sports Wagering was broad. Commissioner Maynard asked what the safeguards were around who had the information about player movements. Senior Regulatory Counsel Levine stated that if the wager category was approved, the rules would be in the Fanatics' House Rules, and Fanatics was going to monitor suspicious wagers from an integrity perspective. Commissioner Maynard asked if Fanatics was planning on capping the wager amounts. Mr. Levine was not able to answer the question.

Chair Judd-Stein asked how the new wager category was going to impact the negotiations of contracts and how integrity was going to be preserved. Mr. Levine stated that he would return to the Commission with additional information on guardrails. Commissioner Hill asked how integrity could be preserved when sports players were able to convince others to move teams. Mr. Levine stated that if such public rumors existed, then the line would not be offered, but the bet still would. Commissioner Hill stated that he was apprehensive about the request and asked if other jurisdictions proposed the same concerns. Mr. Levine stated that he did not receive the rationale behind the approvals from the other jurisdictions. Commissioner O'Brien also stated her concerns about maintaining integrity and stated the need for more information.

Commissioner Maynard asked if any jurisdictions denied the petition. Mr. Levine stated that there were jurisdictions which denied the petition since the request did not align with their definitions of Sports Wagering. Interim Executive Director and General Counsel Grossman

reviewed the Commission's definition of Sports Wagering from G.L. c. 23N, § 3. Commissioner Hill provided his sentiment that this petition was in need of more detail and was not ready for review before the full Commission. The other Commissioners expressed their agreement with Commissioner Hill's sentiment.

c. [Fanatics Betting & Gaming \(FBG\) Request to Add Professional Women's Hockey League \(PWL\) to Event Catalog \(1:10:34\)](#)

Transcriber's note: Discussion of Agenda Item 6(c) occurred before the discussion of the Agenda Item 6(b).

Ms. Beauchemin presented the request from FBG Enterprises Opco, LLC d/b/a Fanatics Betting & Gaming ("Fanatics") to add the Professional Women's Hockey League ("PWL") to the Commission's Event Catalog. *The petition and the memorandum presented were found on pages 98-104 of the Commissioners' Packet.* She noted that there was an update to the memorandum: the league was approved in the catalogs for the following states – Connecticut, Arizona, Colorado, and Kansas.

Commissioner O'Brien asked why the petitioner did not contact a governing body or the players' association. Senior Regulatory Counsel Michael Levine stated that since the initial request, Fanatics has reached out to the governing body and was in receipt of the rules of the league. Commissioner O'Brien asked if the governing body indicated support or was agnostic on the request. Mr. Levine stated that the governing body was agnostic, but the other Operators were also looking forward to offering the PWL. Ms. Beauchemin noted that there was a players' association, but it was not contacted. Commissioner O'Brien stated that she did not have any hesitation about making a motion but asked Fanatics and the other petitioners to reach out to the players' association. Ms. Beauchemin assured the Commissioners that going forward, petitioners would be told to reach out to the players' associations.

Commissioner Maynard moved that the Commission amend the Official Catalog of Events and Wagers to include the Professional Women's Hockey League as included in the Commissioners' Packet and discussed here today.

Commissioner O'Brien offered an amendment that the petitioner provide documentation or communication to the Commission's Sports Wagering Division that they have reached out to the players' association as a condition of adding it to the catalog. Commissioner Maynard accepted the amendment. Commissioner O'Brien seconded the motion as amended.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

d. [General Market Request/Clarification Regarding Super Bowl Prop Wagers](#) (1:48:50)

Mr. Steffen introduced a discussion on the introduction of a new Wager Category, to allow wagering on pre-game Super Bowl proposition wagers, *a memorandum on which was found on pages 105-106 of the Commissioners' Packet.*

Commissioner O'Brien stated her apprehensiveness around approving these new markets due to the human element of control and the definition of Sports Wagering. Commissioner Hill stated his support for the new proposed markets, excluding the Gatorade Color and National Anthem Length markets. The Commissioners discussed a prior meeting which involved a conversation about regulating coin tosses. Commissioner Skinner raised her concern with the lack of a petition for approval of these markets from the Sports Wagering Operators. Mr. Steffen stated that the Operators were planning on offering the markets if they were approved, but the Operators chose not to submit a petition for approval. Commissioner Maynard stated the reasons for his apprehensiveness on approving the Gatorade Color and National Anthem Length markets.

Director of Sports Wagering Bruce Band stated the Sports Wagering Division would be likely to recommend approval of the Coin Toss markets but would not recommend approval of the Gatorade Color and National Anthem Length markets. Commissioner O'Brien requested that an Operator make a formal request for approval of these markets. After a brief conversation, Chair Judd-Stein stated that the Commissioners had a consensus on not approving the Gatorade Color and National Anthem Length markets.

Chair Judd-Stein said that while the Sports Wagering Division attempted to provide efficiency in recognizing these markets, the request needed further information provided by an Operator. Commissioner Hill stated that during a prior Commission meeting discussion, he was uncomfortable with the vote which decided that only an Operator could ask for changes to the Event Catalog. He further stated his disagreement with the rest of the Commissioners and his rationale behind making a motion to approve the new markets despite a lack of a formal request from an Operator. Interim Executive Director and General Counsel Grossman stated that Commissioner Hill was legally allowed under the regulations to bring forth the motion. Mr. Steffen clarified that this was not going to be a new addition to the Event Catalog, rather a clarification or an amendment. Commissioner Skinner asked if the wagers were allowed generally, why there was a need for clarification on whether the wagers were allowed for the Super Bowl. Mr. Steffen clarified that the Operators did not want to offer the wagers and create a noncompliance issue.

Commissioner Maynard noted that 205 CMR 247.03(4)(a), which was discussed in a past Commission meeting, was related to the Commission's approval of Coin Toss Wagering categories. Chair Judd-Stein stated that the New Market Request was not ready for a vote due to the regulation referenced by Commissioner Maynard and needed more information.

Transcriber's note: The Commission went on a break at [2:33:47](#) and returned at [3:04:16](#).

Chair Judd-Stein announced the return of the Commission. Roll call attendance was conducted, and all five Commissioners were present for the meeting.

Interim Executive Director and General Counsel Grossman clarified the regulation language in 205 CMR 247.03. Chair Judd-Stein stated that the Commission will revisit the issue.

7. [Legal and Sports Wagering Division](#) (3:12:20)

Deputy General Counsel Torrisi introduced the requests for cessation and the requests for waivers from the 90-day notice requirement for Betr Holdings, Inc. d/b/a Betr (“Betr”) and WSI US, LLC d/b/a WynnBet (“WynnBet”). She noted a typo in the memorandum correcting the accurate date of cessation for the WynnBet operation to February 23, 2024. *The memorandum, cessation plans, and waiver requests were found on pages 107-133 of the Commissioners’ Packet.*

Commissioner Skinner asked for clarification on the timeline of the reports on the cessation of operations. Deputy General Counsel Torrisi stated that realistically the reports were required 10 days after the plans were approved.

- a. [Betr Notice of Intent to Cease Operations pursuant to 205 CMR 258, including Request for Approval of Cessation Plan and Request for Waiver from 205 CMR 258.01\(1\)](#) (3:23:21)

Director Band provided an overview of Betr’s cessation plan. Commissioner Skinner asked for clarification on the fact that Betr was going to provide a 48-hour notice to its customers. She further asked why Betr chose the specific cessation date of February 16. Head of Gaming Alex Ursa stated that there was possibility of bonus abuse, and it was best practice from an anti-fraud perspective. Commissioner Skinner raised her concern with the practicality of offering bonuses while trying to wrap up operations. Mr. Ursa stated that Betr was willing to stop their bonus offerings. After a brief discussion, Mr. Ursa stated that Betr would inform all Massachusetts customers about the change on February 6, 2024 and would stop offering bonuses by the same date.

Chief Lennon raised a concern about noncompliance with the unclaimed winnings regulations since the customers were going to be given only 30 days to withdraw their winnings. The Commission and Mr. Ursa agreed to adopt language from WynnBet’s cessation plan to address the concern.

Chief Information Officer Katrina Jagroop-Gomes suggested updating the language addressing the change to Betr’s Helpdesk to accommodate the prior change to the cessation date. Mr. Ursa and the Commission agreed with the suggestion.

Commissioner Skinner asked if the occupational licensees were notified about the cessation of operation plan. Deputy General Counsel Torrisi stated that the Commission was going to look more into the issue once the cessation determination was finalized.

Commissioner Skinner and Mr. Ursa discussed the logistics of preventing Massachusetts customers from downloading the app. Chair Judd-Stein announced that the Commission was going to return promptly after considering how the meeting was going to be conducted further.

Transcriber's note: The Commission went on break at [4:11:35](#) and returned [4:27:42](#).

Chair Judd-Stein announced the return of the Commission. Roll call attendance was conducted, and all five Commissioners were present for the meeting.

Chair Judd-Stein stated that the Commission's team was going to meet with Betr's and WynnBet's teams to further resolve the outstanding issues in the cessation plans and would return to the Commission at a later date.

8. [IEB](#) (4:34:47)

Interim Chief Enforcement Counsel and Assistant Director Kathleen Kramer introduced the new process for review of noncompliance matters and the three noncompliance matters before the Commission for today's meeting. *The memorandum on the noncompliance issues was found on page 134 of the Commissioners' Packet.*

- a. [Briefing of noncompliance matter related to Category 3 Sports Wagering Licensee Fanatics and discussion regarding next steps. Alleged noncompliance relates to wager on an unauthorized event in violation of G. L. c. 23N, section 3 and 205 CMR 247.01\(2\)\(a\)\(2\)](#) (5:00:20)

Transcriber's note: Agenda Item 8(a) was discussed after Agenda Item 8(b).

Enforcement Counsel Zachary Mercer briefly introduced a noncompliance issue related to Fanatics. He stated that this alleged incident violated G.L. c. 23N, § 3 and 205 CMR 247.01(2)(a)(2) and involved Fanatics offering a single wager on an unauthorized event featuring a Massachusetts college team.

Commissioner O'Brien stated her opinion to move the matter to an adjudicatory hearing since a similar matter with Fanatics was moved to an adjudicatory hearing in the past. Mr. Mercer stated that there was significant overlap with the prior Fanatics event. He also noted that there was a similar resolution with a noncompliance issue related to MGM Springfield.

Commissioner Hill stated that his opinion that the Commission needed to do the same as with the noncompliance matter related to MGM Springfield. Chair Judd-Stein noted that since the first Fanatics noncompliance issue was taken to an adjudicatory hearing, the second should be treated the same way. Commissioner Hill agreed and suggested joining the matters, with agreement from Commissioner Maynard and Commissioner Skinner.

Chair Judd-Stein asked if the decision to have the Commission handle the issue by an adjudicatory hearing was more burdensome on the Operator. General Counsel Grossman stated that an adjudicatory proceeding was always more burdensome for everyone.

Commissioner Hill stated that he preferred to send both of the matters to IEB for review rather than hold an adjudicatory hearing. Commissioner Skinner agreed with Commissioner Hill with the same conditions as outlined in the discussion of noncompliance related to MGM Springfield. Commissioner Maynard agreed.

- b. [Briefing on noncompliance matter related to Category 1 Sports Wagering Licensee MGM Springfield and discussion regarding next steps. Alleged noncompliance relates to wager on an unauthorized event in violation of G. L. c. 23N, section 3 and 205 CMR 247.01\(2\)\(a\)\(2\) \(4:36:35\)](#)

Transcriber's note: Agenda Item 8(b) was discussed before Agenda Item 8(a).

Enforcement Counsel Diandra Franks briefly introduced a noncompliance issue related to Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGM Springfield"). She stated that this alleged sports wagering noncompliance incident involved a single wager under \$10 on a regular season Northeastern University Men's Basketball game in violation of G.L. c. 23N, § 3 and 205 CMR 247.01(2)(a)(2). She said that this wager involved an eight-leg parlay with two legs that already lost, which made it an overall losing wager. Interim Assistant Director Kramer explained the three options the Commission was able to take regarding the issue.

Commissioner O'Brien stated her opinion that while the issue involved a statutory violation, the monetary amount was de minimis, which did not warrant an adjudicatory hearing. Commissioner Skinner agreed that since the wager amount was small, she wanted the matter to proceed with the IEB under 205 CMR 232. Commissioner Hill also stated his agreement, with the condition that the Commissioners were able to return to the review of certain issues after the investigation by the IEB. Commissioner Skinner asked for confirmation that the issue was going to be returned to the Commissioners after review by the IEB. Interim Assistant Director Kramer stated that if the IEB decided that the noncompliance matter warranted a civil administrative penalty or the IEB recommended a license suspension or revocation, then the issue would return to the Commissioners for ratification.

Commissioner Skinner asked if there was an opportunity for the issue to be sent to IEB and to be returned to the Commission regardless of the recommendation. General Counsel Grossman stated that the only instance when the Commissioners would not see the matter was if the IEB were to find no statutory violation. Commissioner Skinner clarified that she wanted to know the rationale behind IEB's decision-making and for that rationale to be consistent with the Commission's other decisions. She further asked that the matter was sent to the IEB and that the IEB report back to the Commission on their decision.

Interim IEB Director Caitlin Monahan agreed with Commissioner Skinner's proposal and stated that the IEB would return to the Commission to explain their decision-making process. Commissioner Maynard stated his concern with a possible situation where the Commissioners were not able to make a change to the IEB's recommendation. Interim Assistant Director Kramer responded by stating that if the IEB recommended a civil administrative penalty, the Commission still would have final approval. Commissioner O'Brien stated that this decision was

not going to prevent the Commission from moving forward in a different way. Interim Director Monahan stated that a vote was not needed on the issue.

- c. [Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee BetMGM and discussion regarding next steps. Alleged noncompliance relates to wagers on unauthorized events in violation of G. L. c. 23N, section 3 and 205 CMR 247.01\(2\)\(a\)\(2\)](#) (5:09:24)

Interim Assistant Director Kramer briefly introduced a noncompliance issue related to BetMGM. She stated that this incident involved violations of G.L. c. 23N, § 3 and 205 CMR 247.01(2)(a)(2) and involved college football player parlay props with an outcome dependent on an individual athlete. She said that the alleged incident involved over 15,000 wagers with total stakes over \$200,000.

Commissioner O'Brien stated that this issue warranted an adjudicatory hearing due to the breadth of the issue, statutory violation, number of bets placed, the monetary amount involved and the fact that the Sports Wagering Division caught the violation. The Commissioners agreed with Commissioner O'Brien's suggestion.

9. [Research and Responsible Gaming](#) (5:14:01)

- a. Risk Identification and Response Technology Solutions

The Commission reached a consensus to discuss this agenda item at a later meeting due to time constraints.

- b. [PlayMyWay: A Brief Review and Evaluation of Uptake and Effectiveness](#) (5:14:30)

Director Vander Linden briefly introduced the Responsible Gaming program PlayMyWay. Professor Michael Wohl of the Department of Psychology at Carleton University and Director Vander Linden presented on the program with topics including the following: risk perception, program goals, enrollment, and measures. *The presentation was found on pages 160-184 of the Commissioners' Packet.*

- c. GameSense Quarterly Report

The Commission reached a consensus to discuss this agenda item at a later meeting due to time constraints.

10. Legal and Responsible Gaming

- a. Responsible Gaming Considerations for Digital Payments in Casino Gaming

The Commission reached a consensus to discuss this agenda item at a later meeting due to time constraints.

11. Discussion and Possible Adoption of Revised MGC Mission Statement

The Commission reached a consensus to discuss this agenda item at a later meeting due to time constraints.

12. [AGO Report and Update: Regulation of Daily Fantasy Sports and Illegal Sports Wagering Market](#) (5:55:20)

a. [Executive Session](#) (5:56:20)

Chair Judd-Stein stated that the Commission anticipated that it would meet in executive session in accordance with G.L. c. 30A, § 21(a)(3) to discuss with the Attorney General's Office strategy with respect to enforcement or litigation concerning the illegal sports wagering market. She stated that the public session of the Commission meeting would not reconvene at the conclusion of the executive session.

Commissioner Hill moved that the Commission enter executive session for the reasons just stated on record by the Chair. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

13. [Personnel Matter](#) (5:58:26)

a. [Executive Session](#) (5:58:50)

Chair Judd-Stein stated that the Commission anticipated that it would meet in executive session in accordance with G.L. c. 30A, § 21(a)(2) to conduct a strategy session in preparation for negotiations with Mark Vander Linden, a non-union employee of the Commission. She stated that the public session of the Commission meeting would not reconvene at the conclusion of the executive session.

Commissioner Hill moved that the Commission enter executive session for the reasons just stated on record by the Chair. Commissioner Maynard seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

14. [Commissioners Update](#) (5:59:37)

Commissioner Maynard updated the Commission on the group, consisting of Commissioner Maynard, Commissioner Hill and Director Vander Linden, which began meeting with the interested stakeholders to address underage sports wagering.

15. [Other Business](#) (6:00:31)

No other business was raised by the Commissioners prior to entering the executive session.

Transcriber's note: The Commission entered executive session and did not reconvene the public meeting.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated January 30, 2024
2. [Commissioners' Packet](#) from the February 1, 2024 public meeting (posted on massgaming.com)
3. [Additional Meeting Materials I](#) from the February 1, 2024 public meeting (posted on massgaming.com)
4. [Additional Meeting Materials II](#) from the February 1, 2024 public meeting (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: August 29, 2024, 10:00 a.m.
Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 012 0315

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

Commissioners Present:

Interim Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner

1. [Call to Order](#) (00:02)

Interim Chair Jordan Maynard called to order the 529th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted. All four Commissioners were present for the meeting. Prior to the start of the meeting's agenda, the Interim Chair, Commissioners, and Commission Staff members extended their gratitude to the outgoing Chief of the Sports Wagering Division Bruce Band.

2. [Meeting Minutes](#) (10:51)

- a. December 19, 2022
- b. September 19, 2023
- c. September 21, 2023
- d. November 7, 2023

The four sets of meeting minutes were included in the Commissioners' Packet on pages 4 through 71.

Commissioner Skinner moved that the Commission approve the executive session minutes from the December 19, 2022, September 19, 2023, September 21, 2023, and November 7, 2023

meetings that are included in the Commissioners' Packet and discussed here today, subject to any necessary edits for typographical errors or any other non-material matters.

Chair Maynard offered a friendly amendment to indicate that Commissioner Skinner's motion included the language "executive session" but noted that the minutes were from public meetings. Commissioner Skinner accepted Chair Maynard's amendment. Commissioner O'Brien then seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

Motion passed unanimously, 4-0.

3. [Legislative Update](#) (12:30)

Commissioner Hill thanked the Interim Chair for the introduction and stated that there was no Legislative Update to provide at today's meeting.

4. [Discussion of Conclusion of Independent Monitor Condition for Wynn MA LLC](#) (12:43)

Interim Chair Maynard recognized General Counsel Todd Grossman to provide an overview on agenda item four. General Counsel Grossman explained that the Independent Monitor condition was initially attached to Wynn MA, LLC's ("Wynn") license via a written decision dated April 30, 2019, following an extensive adjudicatory hearing. He acknowledged the significant work done by the Commission and the Independent Monitor team over the years to monitor the company's status. General Counsel Grossman stated that the central question before the Commission now was whether Wynn had satisfied these conditions. Representatives from Wynn and Encore Boston Harbor ("Encore"), including Vice President and General Counsel of Encore Jacqui Krum, Executive Vice President and General Counsel of Wynn Resorts Ellen Whittemore, and Executive Vice President of People & Culture Susie McDaniel were present to provide any additional information requested by Commissioners.

General Counsel Grossman then reviewed the conditions imposed by the Commission in 2019 and their status. He noted that two substantial fines imposed in the 2019 decision were paid. The condition requiring the separation of the Chair of the Board of Directors and CEO positions had been met and was included in the corporate guidelines. Matthew Maddox was required to undergo professional coaching, which he completed, along with other staff members. Reports of attendance at meetings by members of the Board of Directors and subcommittees are contained in the minutes of those meetings which are in the possession of the Investigations and Enforcement Bureau ("IEB"). General Counsel Grossman added that the Independent Monitor conducted a comprehensive review of the company, detailed in a report dated May 31, 2024.

General Counsel Grossman read conclusions from the Independent Monitor's report, stating that the company has appropriate and sustainable processes in place to identify HR-related risks. Wynn successfully transitioned from a founder-led organization to one where employees are encouraged to take ownership and are empowered to speak up. He noted that Wynn had satisfied the Independent Monitor's recommendations by solidifying the authority and independence of its Human Resources Compliance Program. General Counsel Grossman concluded that the company appeared to have satisfied all of the conditions set out in the Commission's 2019 Decision. He then welcomed remarks and comments from Commissioners.

Commissioner O'Brien stated that she had asked for this topic to be on the agenda to "officially close the loop," noting the five-year mark of the imposition of the Independent Monitor would be September 5th. She confirmed her satisfaction that Wynn/Encore had met the conditions, including those that self-effectuated like the fines and coaching requirements. She inquired about the timeline for the condition separating the CEO and Chair roles. General Counsel Grossman confirmed that this condition was for the full 15-year term of the Category 1 license held by Wynn. Commissioner O'Brien expressed satisfaction that they could move forward without an adjudicatory hearing regarding issues raised in the last Independent Monitor report as the other conditions were met.

Commissioners Hill and Skinner agreed with Commissioner O'Brien's suggestion that an adjudicatory hearing would not be warranted. Interim Chair Maynard added his agreement and thanked representatives from Wynn and Encore, stating that they had been extremely helpful and that he appreciated their partnership and willingness to work with the Commission and the Independent Monitor.

Ms. Krum thanked the Commission, noting it was an entire company effort. Ms. Whittemore spoke on behalf of Wynn, expressing pleasure with the efforts made to change the workplace culture and become an "employer of choice". She appreciated the Independent Monitor's help in identifying areas for improvement and mentioned that the company also identified and implemented enhancements on their own. She thanked the Commission for their confidence and trust from five years prior.

Interim Chair Maynard asked if there was anything formal required by the Commission. General Counsel Grossman confirmed that the matter was concluded, and no further action would be taken by the Independent Monitor. Interim Chair Maynard thanked General Counsel Grossman and remarked that the Commission was lucky to have Encore as a partner in the Commonwealth.

5. [Research and Responsible Gaming Division](#) (26:04)

a. Responsible Gaming Education Month

Director of the Division of Research and Responsible Gaming Division Mark Vander Linden provided a brief discussion on Responsible Gaming Education Month (RGEM), which takes place every September. He stated that the initiative was now in its 26th year and originated with the American Gaming Association (AGA). RGEM aims to promote responsible gaming nationwide by involving gaming industry, advocate groups, regulators, and other stakeholders to enhance transparency and gambling literacy.

Key programs highlighted by Director Vander Linden during RGEM included the GameSense program that engaged approximately 80,000 individuals in the last fiscal year. He added that evaluations demonstrated that participants felt more informed about their gambling behavior and more attuned to responsible gaming after interacting with GameSense advisors. Director Vander Linden also highlighted the Play My Way program that was launched in 2015 to help players make decisions about gambling and understand their playing behavior in real time.

Director Vander Linden concluded by stating that the Commission's Responsible Gaming Framework was supported by an annual research agenda, with data from evaluations of programs like GameSense and Play My Way being used to inform and improve future initiatives. He stated that RGEM would be a "jam-packed month" of activities involving the GameSense team, casinos, sports wagering operators, and the Massachusetts Council on Gaming and Health, with a new emphasis on partnering with sports wagering operators to promote safer gambling.

b. [Presentation of “Gambling and Problem Gambling in Massachusetts: Results of Three Online Panel Surveys”](#) (32:44)

Director Vander Linden then presented the results of three online panel surveys of adults in Massachusetts. He noted that the results included findings from the results of three online panels which explored gambling and problem gambling behavior in Massachusetts. Director Vander Linden thanked the UMASS SEIGMA research team for their work on the project, including Dr. Rachel Volberg who was present to give a presentation on the studies before the Commission. Dr. Volberg mentioned that her presentation would start by looking carefully at the methodology used for these online panel surveys, noting that it was a different approach from past general population surveys. Her presentation focused on the findings regarding attitudes, gambling behavior, and gambling problems and harms. *An executive summary of the study, final report, research snapshot and the presentation used by Dr. Volberg were included on pages 72 through 132 of the Commissioners' Packet.*

Three online panel surveys were carried out in Massachusetts as part of the SEIGMA study. The Baseline Online Panel Survey (BOPS) was fielded in 2013 and 2014; the Follow-up Online Panel Survey (FOPS) was fielded in March 2022; and the 2023 Online Panel Survey (OPS23) was fielded one year later in March 2023. Dr Volberg stated that the goal of the online surveys was not to generate estimates of behaviors in the population but instead to track changes in behavior over time among regular (monthly or more frequent) gamblers. SEIGMA's report

assessed changes among monthly gamblers in the online panels in Massachusetts in gambling attitudes, gambling participation and problem gambling prevalence from 2014 to 2023.

Commissioner Hill expressed his surprise regarding the observed increase in horse racing bets which the survey yielded, given the general decline of the industry nationally. He stated his intention to investigate this trend further by consulting with Director of the Racing Division Dr. Lightbown and other experts. Dr. Volberg clarified that the online survey did not distinguish between people betting on simulcast and with Advanced Deposit Wagering online versus those going to off-track-betting parlors or racetracks for live racing. She advised Commissioner Hill to be aware of this caveat as he further investigated the trend.

Commissioner Hill also noted a significant increase in sports parlays and observed a minor increase in illegal betting despite the legalization of sports wagering. He questioned the reasons behind the increase in illegal betting, wondering if factors such as taxation or the ease of access to bookies contributed to this trend. He suggested that the Commission would need to watch and examine this closely moving forward.

Commissioner O'Brien requested a "deeper dive" into the statistics differentiating the legal versus illegal markets, pointing out what appeared to be contradictions in the data. She was curious if the general destigmatization of online gambling might inadvertently be leading to a spillover into the illegal market. She emphasized the ongoing need to educate consumers about the differences between legal and illegal gambling options, especially in the online space, where it might be more complicated for consumers to distinguish than in traditional in-person illegal betting. She also acknowledged that the early stages of sports wagering legalization might explain some trends and that continued monitoring through future surveys (like those planned for 2024 and 2025) would be crucial.

Dr. Volberg agreed with Commissioner O'Brien's assessment and noted the value and impact of the research presented to the Commission. She stated that it was "always nice to get people's attention with research" and expressed pleasure in presenting the details of the research and findings to the Commission. She also affirmed the SEIGMA team's pride in contributing to the Commission's role in putting policy into effect based on this research, emphasizing that it was "Research in Action."

Interim Chair Maynard thanked Director Vander Linden and Dr. Volberg and noted that the Division has some of the best research initiatives in the country.

6. [Sports Wagering Division](#) (1:13:16)

a. Update to House Rules

Director of the Sports Wagering Division Bruce Band introduced Sports Wagering Operations Manager Andrew Steffen to review three sports wagering operators' requests to update their

House Rules. Manager Steffen thanked Director Band for his years of service and his work at the Commission.

i. [BetMGM](#) (1:14:15)

Starting first with BetMGM, Manager Steffen highlighted that BetMGM was seeking approval of language changes in its house rules. *A memorandum regarding the changes and proposed edits to BetMGM's House Rules were included in the Commissioners' Packet on pages 133 through 151.* Manager Steffen stated that the Sports Wagering Division was recommending approval of the requested changes. He noted that BetMGM Trading Compliance Analyst Zach Krause was present to answer any questions from Commissioners.

Commissioner Hill moved that the Commission approve the updates to BetMGM's House Rules as included in the Commissioners' Packet and discussed here today. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously 4-0.

ii. [MGM Springfield](#) (1:19:53)

Manager Steffen presented the changes to MGM Springfield's House Rules for its retail sports book within the gaming establishment. *A memorandum regarding the changes requested by MGM Springfield was included in the Commissioners' Packet on pages 152 through 170.* Manager Steffen explained that many of the revisions requested were identical to those proposed by BetMGM, save for a few outliers. A notable difference from BetMGM's updates was the exclusion of the minimum length of play rule for football games. He stated that this was because MGM Springfield's kiosks were not technically capable of handling the change, specifically, the retail trading tool could not settle one side of a wager and cancel the other (e.g., settling the "over" bet and canceling the "under" bet if a game was suspended before 55 minutes of play). Manager Steffen concluded by stating that the Sports Wagering Division was recommending approval for these changes.

Commissioner O'Brien inquired why the House Rules were not "identical" to BetMGM's, highlighting the discrepancy between certain updates. Mr. Krause explained that the retail trading tool at MGM Springfield lacked the functionality to settle one side of a wager while canceling the other in scenarios like a suspended NFL game. He confirmed there was currently no way around this limitation for the retail kiosk. Commissioner O'Brien asked if there was a

way to fix this issue after the fact to which Mr. Krause responded that while they were working on a potential solution, it was not ready for the current submission.

Commissioner Skinner moved that the Commission approve the updates to MGM Springfield's House Rules as included in the Commissioners' Packet and discussed here today. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously 4-0.

iii. [FanDuel](#) (1:23:44)

Manager Steffen then presented the requested changes to FanDuel's House Rules for its online platform, including revisions within Baseball, Basketball, MMA, Hockey and Soccer markets. *A memorandum regarding the changes and proposed changes to FanDuel's House Rules were included in the Commissioners' Packet on pages 171 through 179.*

Commissioner Hill moved that the Commission approve the updates to FanDuel's House Rules as included in the Commissioners' Packet and discussed here today. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously 4-0.

7. [Racing Division](#) (1:27:38)

- a. Standardbred Owners of Massachusetts ("SOM") Recognition Request as Breeders' Representative Group

Director of the Racing Division Dr. Alexandra Lightbown introduced SOM's Secretary and Treasurer Nancy Longobardi to discuss a request that SOM be recognized as the representative group for Standard Horse breeding in the Commonwealth. *A memorandum regarding the request from the Standardbred Owners of Massachusetts was included in the Commissioners' Packet on pages 180 and 181.*

Ms. Longobardi highlighted the historical significance and success of the Massachusetts Standardbred industry and noted that the program's goal was to promote agriculture and open space while improving the breed and providing economic benefits to the industry. She added that annual purses awarded in the Harness Horse Racing industry have grown substantially, reaching \$3 million last year as compared to \$600,000 in 2015. Ms. Longobardi expressed appreciation for the support provided by the Commission and staff regarding the challenges faced by the organization this year.

Commissioner Hill moved that the Commission approve the request of the Standardbred Owners of Massachusetts, Inc. to be recognized as the group of representative Standardbred breeders to administer the Massachusetts Standardbred breeding program and the Sire Stakes races for 2024 as included in the Commissioners' Packet and discussed here today. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously 4-0.

b. [Review of Racing License Application for Annual Renewal](#) (1:39:08)

The review of the Racing License Application for Annual Renewal was presented by Dr. Lightbown, Deputy General Counsel Justin Stempeck, and Chief of the Licensing Division Karalyn O'Brien. *A memorandum and the draft license application was included in the Commissioners' Packet on pages 182 through 202.* Dr. Lightbown noted that the primary change to the application was the addition of a section requiring suitability disclosures. This new question, designated as Question #30, encapsulated the suitability requirements for qualifiers designated by the Licensing Division. She noted that this review applied to both new racing applicants and renewal applicants.

Deputy General Counsel Stempeck added that the issue was timely. He noted that the renewal application needed to be approved promptly because Plainridge Park Casino (PPC) is required to file their annual renewal application by October 1st.

Interim Chair Maynard asked for confirmation that the Licensee, Plainridge Racing and Gaming, had been contacted and was aware of the change, given that it was a significant addition. Dr. Lightbown confirmed that Racing Manager Steve O'Toole had proactively raised the matter, and internal staff meetings determined the best way to proceed.

Chief O'Brien confirmed that the Licensing Division had already been in contact with the Licensee, Penn Entertainment, as well as Gaming and Leisure Properties, Inc. (GLPI), regarding

the scoping survey for suitability, and the process was already underway. She noted that this effort was partly aimed at consolidating applications as PPC's Category 2 gaming license is also up for renewal in 2025.

Commissioner Skinner sought confirmation that any new applicant would also be subject to the suitability requirements in the application. Deputy General Counsel Stempeck confirmed that the suitability requirements, pursuant to 205 CMR 15.00, will cover both new applicants and existing racing licensees renewing their applications.

Commissioner Skinner moved that the Commission approve the updated licensing application as included in the Commissioners' Packet and discussed here today. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously 4-0.

Transcriber's Note: The Commission took a short recess before the start of the next agenda item. The meeting was [reconvened](#) at 12:00 P.M. A roll call was conducted, and all four Commissioners were present.

8. [Legal Division](#) (1:57:40)

- a. Discussion of Amendments to Ohio Administrative Code Rule 3775-16-03: Sports Gaming Accounts requiring the use of Multi-factor Authentication and Discussion of Possible Amendments to 205 CMR to Mandate the use of Multi-factor Authentication by Massachusetts Sports Wagering Operators

Deputy General Counsel Carrie Torrisi, joined by Sports Wagering Business Manager Crystal Beauchemin and Gaming Technical Compliance Manager Christian Taveras on behalf of the IT department, discussed the proposed amendment to the Ohio Administrative Code Rule 3775-16-03 concerning mandatory Multi-Factor Authentication (MFA) for sports wagering accounts. She stated that today's objective was to gain guidance from the Commission on whether to amend 205 CMR to mandate MFA for Massachusetts sports wagering operators. *A memorandum regarding MFA, Ohio's Regulatory Code, and comments from sports wagering operators were included in the Commissioner's Packet on pages 203 through 239.*

Commissioner O'Brien stated her preference for requiring MFA and initially leaned toward the Ohio model, which required MFA at every login, but noted that she was open to discussion on this aspect. She highlighted that MFA could be beneficial from a Responsible Gaming (RG)

perspective as well due to the "conscious effort" one must take to log in, which may help mitigate underage betting concerns as well.

Commissioner Hill questioned the impetus for mandating MFA since it was currently available as an option. He stated that while he found MFA personally inconvenient, he recognized that it could prevent underage individuals from accessing accounts. Interim Chair Maynard agreed that a mandate would naturally help address the issue of underage betting. He stated that he preferred the New Jersey and Pennsylvania models that required MFA use when patrons used a new device or every two weeks.

Commissioner Skinner sought clarification on the data that would be protected through use of MFA like bank account information. She sought assurance that technological changes would not require constant regulation amendments. She ultimately agreed it was worthwhile to require some added measure of protection. Deputy General Counsel Torrisi clarified that MFA was already required in Massachusetts for password resets and failed login situations, but requiring it for every login would be an expansion.

Commissioners agreed that further information would be helpful before voting on the requirement to use MFA. They agreed that gaining input from the Division of Research and Responsible Gaming, opinions from Massachusetts operators, and feedback from data protection groups as well as the Attorney General's Office would be essential to review before moving forward on this issue.

9. [Investigations and Enforcement Bureau](#) (2:19:45)

a. Executive Session - Security at the Casino Facilities

Director of Investigations and Enforcement Bureau (IEB) Caitlin Monahan requested that the Commission convene an executive session to discuss safety and security at the three Casino properties.

The Interim Chair then read the following statement into the record: "The Commission anticipates that it will meet in executive session in accordance with G.L. c. 30A, § 21(a)(4), c. 30A, § 21(a)(7), and G.L. c. 4, § 7(26)(f) to discuss the use and deployment of security personnel or devices, or strategies with respect thereto at Encore Boston Harbor, MGM Springfield and Plainridge Park Casino, specifically with regard to firearms and parking garage security; to discuss investigatory materials related to MGM parking garage security, necessarily compiled out of the public view by the IEB the disclosure of which materials would probably so prejudice the possibility of effective law enforcement that such disclosure would not be in the public interest; and to discuss responses to the Commission's internal control related directives submitted by Encore Boston Harbor, MGM Springfield, and Plainridge Park Casino related to the same subject matter outlined herein."

Interim Chair Maynard noted that the Commission would not return to the public session after the executive session.

Commissioner O'Brien moved to enter the executive session for the reasons stated on the record by the Interim Chair. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously 4-0. The Commissioners entered the executive session.

10. [Commissioner Updates](#) (2:19:06)

Prior to the start of Agenda Item 9, Interim Chair Maynard asked if there were any Commissioner updates. No updates were stated.

11. [Other Business](#) (2:19:35)

Prior to the start of Agenda Item 9, Interim Chair Maynard asked if there was any new business. No new business was noted.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated August 27, 2024
2. [Commissioners' Packet from the August 29, 2024 Meeting](#) (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: October 9, 2025, 10:00 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 854 5655

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

Commissioners Present:

Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

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

Chair Maynard called to order the 567th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

2. [Meeting Minutes](#) (00:34)

The minutes from the May 9, 2024, May 23, 2024, September 9, 2025, and September 11, 2025 public meetings were included in the Commissioners' Packet on pages 5 through 41.

Commissioner Brodeur moved that the Commission approve the minutes from the following public meetings, as included in the Commissioners' Packet, subject to necessary corrections for typographical errors or other non-material matters: May 9, 2024 and May 23, 2024. Commissioner Hill seconded the motion.

Commissioner Skinner noted that she was not present at the public meeting on May 9, 2024. Commissioner O'Brien moved to amend the motion to only cover the May 9, 2024 public meeting. Commissioner Skinner seconded the amendment and Commissioner Brodeur accepted the amendment.

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Abstain.
Commissioner Brodeur: Abstain.
Chair Maynard: Aye.
The motion passed, 3-0 with two abstentions.

Commissioner Brodeur moved that the Commission approve the minutes from the following public hearing, as included in the Commissioners' Packet subject to necessary corrections for typographical errors or other non-material matters: May 23, 2024.

Commissioner O'Brien noted for clarity of the record that the minutes were for a public meeting, not a public hearing. Commissioner O'Brien then seconded the motion.

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Abstain.
Chair Maynard: Aye.
The motion passed, 4-0 with one abstention.

Commissioner Brodeur moved that the Commission approve the minutes from the following public meetings, as included in the Commissioners' Packet subject to necessary corrections for typographical errors or other non-material matters: September 9, 2025 and September 11, 2025. Commissioner O'Brien seconded the motion.

Commissioner Skinner noted that she was included in a roll call vote for the September 9, 2025 meeting and clarified that she was not present for that meeting.

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Abstain.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.
The motion passed, 4-0 with one abstention.

3. [Presentation on Sports Wagering VIP Programs](#) (04:59)

Division Chief of Sports Wagering Carrie Torrisi provided an opening statement regarding VIP programs and regulatory guardrails. Chief Torrisi and Director of Research and Responsible Gaming Mark Vander Linden presented on Sports Wagering Operator VIP Programs with topics

including the following: loyalty programs, VIP programs, tier status and gambling harms, pressure to maintain or increase tier status, summary of Massachusetts operator VIP programs, and a possible regulatory framework. *The Sports Wagering VIP Program presentation was included in the Commissioners' packet on pages 41 through 62.*

Commissioner Hill asked what other jurisdictions regulated VIP programs. Director Vander Linden stated that the United Kingdom had policies that regulated VIP programs but that he was not familiar with any U.S. state that regulated VIP programs. Chief Torrisi stated that she was unaware of any other U.S. state that had a framework addressing VIP programs.

Commissioner Brodeur stated that there was a cause for concern regarding this topic but that he expected more data would be needed before the Commission made a decision. He stated there is a legitimate function where operators use VIP programming to defend market share. He expressed an interest in what is communicated to the customers when a VIP program is offered or incentives are increased. He stated that he would want more information regarding whether requests for responsible gaming services could affect customers' VIP status.

Commissioner Brodeur asked if operators were required to maintain interactions and call logs whenever hosts communicate with VIPs and stated that the interactions should be maintained. Chief Torrisi stated that because the Commission did not yet have a regulatory framework, it was an operator-specific question. She stated that if the Commission established guardrails, it would make sense for the Commission to require that operators maintain interactions and call logs.

Commissioner Brodeur asked if there had been any private litigation regarding VIP programming. Director Vander Linden stated that there had been litigation, including a number of high-profile cases where customers filed suits against sports wagering companies. He stated that those lawsuits would be a good place to look should the Commission choose to develop a framework and regulations regarding VIP programs.

Commissioner O'Brien stated that she would like a more public discussion of the U.K. model. She expressed an interest in knowing more about federal and state privacy protection challenges and other potential statutory hurdles. She stated that she wanted more information regarding the range of gifts and events offered to VIPs. She stated that she wanted more information regarding the amount of responsible gaming training VIP hosts received.

Commissioner O'Brien noted that the Commission previously prohibited third-party marketers from being incentivized by click-retention and expressed concern about whether VIP hosts had similar incentivization. Commissioner Skinner stated that her fellow Commissioners addressed all her comments and requests.

Chair Maynard stated that VIP programs should be for those who can afford to be VIPs and should not be predatory. He stated that the VIP program discussion went hand-in-hand with the conversation regarding operators limiting players. He noted that every Commissioner expressed an interest in ensuring customers are not being preyed upon. He stated that he supported getting the additional data and requests asked for by the other Commissioners. He stated that he looked forward to future conversations on this topic.

4. Investigations and Enforcement Bureau (32:59)

- a. Briefing on noncompliance matter related to Temporary Category 3 Sports Wagering Licensee BetMGM, LLC and discussion regarding next steps. Alleged noncompliance relates to wagers offered by BetMGM on unauthorized events in violation of 205 CMR 247.01(1), 205 CMR 247.01(2)(i) and the Massachusetts Sports Wagering Catalog

Enforcement Counsel Nathaniel Kennedy stated that the Investigations and Enforcement Bureau (“IEB”) was seeking Commission guidance regarding two similar violations. He explained that BetMGM had offered wagers on two boxing matches governed by the UAE Boxing Commission, a league which was not approved for wagering in Massachusetts. He stated that 79 wagers were placed between June 22, 2025 and August 15, 2025 for a total wager amount of \$1659.56.

Commissioner O’Brien asked if this was the first time operators offered wagers on UAE Boxing Commission events. Counsel Kennedy stated this was the first time UAE Boxing Commission events were offered, but there had been similar incidents when wagers were offered on non-sanctioned events.

Commissioner O’Brien asked why two operators both started offering wagers on sporting events from the same unsanctioned body in the same timeframe. Counsel Kennedy explained that there were different root causes. He stated that BetMGM’s offerings were due to a trader error, whereas DraftKings’ offerings were due to an event sponsor giving them the impression that the events were governed by the British Boxing Commission. Commissioner O’Brien stated that she would want follow-up information regarding the individual that misrepresented who the event sponsor was to DraftKings, information as to whether DraftKings continued to work with that individual, and if other events needed to be reviewed.

Commissioner Brodeur stated that the matter could be referred back to the IEB for a recommendation and asked if that process also involved making the customer whole. Director of the IEB Caitlin Monahan stated that the operator allows winning wagers to stand and refunds lost wagers. She stated that the operators generally have already done that by the time the Commission reviews the matter, so the Commission does not usually have to order the operators to do so. She stated that the Commission could order operators to refund wagers if necessary. She noted that civil administrative penalties were decided on a case-by-case basis. Commissioner Brodeur thanked Director Monahan for the clarification.

Chair Maynard stated that there was not a tradeoff between profit and the penalty amount. He stated that operators should refund the profit and pay a penalty on top of that amount. The Commission reached a consensus to refer this matter back to the IEB for a recommendation.

- b. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee Crown MA Gaming, LLC d/b/a DraftKings and discussion regarding next steps. Alleged noncompliance relates to wagers offered by DraftKings on unauthorized events in

violation of 205 CMR 247.01(1), 205 CMR 247.01(2)(i) and the Massachusetts Sports Wagering Catalog (41:03)

Counsel Kennedy explained that DraftKings offered wagering on three UAE Boxing Commission events. He stated that 406 wagers were placed between August 8, 2025 and August 15, 2025 for a total of \$22,681.72 wagered. The Commission reached a consensus to refer this matter back to the IEB for a recommendation. Commissioner O'Brien reiterated that she wanted to know more details about the individual or entity that made representations to DraftKings about the governing bodies for these events.

c. Overview of Durable Suitability Investigation process for Sports Wagering Vendors (43:03)

I. Executive Session

Director Monahan stated that this topic required the discussion of investigatory materials and requested that the discussion be held in executive session.

Director Monahan stated that the Commission anticipated that it would convene in an executive session in accordance with G.L. c. 30A, §21(a)(7) and G.L. c. 4, §7(26)(f) to discuss investigatory materials related to the Durable Suitability investigation process for sports wagering vendors necessarily compiled out of the public view by the Investigations and Enforcement Bureau ("IEB") the disclosure of which materials would probably so prejudice the possibility of effective law enforcement that such disclosure would not be in the public interest. Chair Maynard asked if the Commission wanted to move into executive session.

Commissioner Brodeur moved to enter executive session on the matter and for the reasons just articulated by Director Monahan. Commissioner Skinner seconded the motion.

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

Transcriber's Note: The Commission entered executive session at 10:53 A.M., and the public meeting session reconvened at 11:26 A.M.

d. Discussion regarding the term of sports wagering vendor licenses pursuant to 205 CMR 234, including potential amendments to said regulation. (1:17:28)

Director Monahan stated that sports wagering vendor licenses were currently issued for a period of three years. She stated that this timeline mirrored the gaming vendor licenses which are issued for three years by statute. She stated the Commission had the flexibility to change the length of time that sports wagering vendor licenses are issued for. She explained the differences in length

of licensure for vendors in other jurisdictions, noting that Michigan, Pennsylvania, and Louisiana each issued five-year licenses to vendors. She noted that approved vendor licenses did not expire in New Jersey, but vendors had to resubmit materials every five years. She stated that there was little risk in changing the sports wagering vendor license term from three years to five years as the vendors had an ongoing duty to report to the IEB.

Commissioner Brodeur stated that the Commission would maintain its jurisdiction and investigatory oversight over licensees regardless of the timespan between initial licensure and the renewal. The Commission reached a consensus to change the sports wagering vendor license term to five years. Director Monahan stated that she would work with the Legal Division to draft changes to the regulations.

5. Legal (1:23:23)

- a. 205 CMR 247.07: Acceptance of Sports Wager – Discussion and Review of Regulation Amendments and Small Business Impact Statement for authorization to begin the promulgation process by Commission

Interim General Counsel Justin Stempeck presented proposed amendments to 205 CMR 247.07. *The proposed draft of 205 CMR 247.07 and Small Business Impact Statement were included in the Commissioners' Packet on pages 64 through 69.*

Interim General Counsel Stempeck stated that he was proposing that identical language regarding digital, crypto, and virtual currencies be struck from 205 CMR 247.07 and 205 CMR 248.10. He stated that the language was put in place by Gaming Laboratories International (“GLI”) as a starting point without a robust discussion of the pros and cons of permitting use of such currencies. He stated that the Gaming Enforcement Unit (“GEU”) recommended the language be removed.

First Lieutenant of the GEU David Collett explained that cryptocurrencies were decentralized, unregulated, and a new market. He stated that cryptocurrency was pseudo-anonymous and practically untraceable. Director Monahan stated that without knowing the origins of the funds, there was a risk of anti-money laundering (“AML”) and Bank Secrecy Act (“BSA”) violations. She stated that cryptocurrencies could be used to launder money through sports wagering platforms and prohibiting the use of cryptocurrencies would cut off that avenue for that illegal activity.

Chair Maynard noted that Commissioner Skinner had some technical difficulties exiting the executive session and asked Commissioner Skinner if she had any comments regarding the previous topic of sports wagering vendor licenses. Commissioner Skinner stated she had nothing to add. Chair Maynard stated that the other four Commissioners had reached a consensus to move the time length for vendor licenses to five years instead of three years.

Commissioner Skinner stated that cryptocurrency was a popular discussion topic at a conference she had recently attended. She stated that federal legislation had recently passed regarding cryptocurrency. Director Monahan stated that cryptocurrencies were currently unregulated,

pending legislation in Congress. She stated that there were too many risks associated with cryptocurrencies to permit them at this time. Commissioner Skinner agreed and expressed an interest in further discussion of cryptocurrency once legislation moved forward.

Commissioner Brodeur expressed an interest in hearing from stakeholders in the crypto industry regarding these regulation changes. He stated that it was currently the right move to prohibit funding accounts through cryptocurrency, but he would like to see input from the industry.

Chair Maynard stated that cryptocurrency could be converted to cash and be used for sports wagering. He stated that there were schematic issues in the regulation of the cryptocurrency market. Commissioner Hill noted that the U.S. House and Senate passed the GENIUS Act which affected cryptocurrencies. He stated that this might have been the topic discussed at the conference attended by Commissioner Skinner.

Commissioner Hill moved that the Commission approve the Small Business Impact Statement and the draft of 205 CMR 247.07 included in the Commissioners' Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. 205 CMR 248.10: Account Deposits: Discussion and Review of Regulation Amendments and Small Business Impact Statement for authorization to begin the promulgation process by Commission (1:35:38)

Interim General Counsel Stempeck presented proposed amendments to 205 CMR 248.10. *The proposed draft of 205 CMR 248.10 and Small Business Impact Statement were included in the Commissioners' Packet on pages 70 through 75.*

Commissioner O'Brien moved that the Commission approve the Small Business Impact Statement and the draft of 205 CMR 248.10 included in the Commissioners' Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.
Chair Maynard: Aye.
The motion passed unanimously, 5-0.

c. 205 CMR 141.06: Notice to the Commission of Changes – Discussion and Review of Regulation Amendments and Small Business Impact Statement for authorization to begin the promulgation process by Commission (1:37:08)

Associate General Counsel Melanie Foxx presented proposed amendments to 205 CMR 141.06. *The proposed amendments to 205 CMR 141.06 and Small Business Impact Statement were included in the Commissioners' Packet on pages 76 through 79.*

Commissioner Hill moved that the Commission approve the Small Business Impact Statement and the draft of 205 CMR 141.06 included in the Commissioners' Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner O'Brien seconded the motion.

Roll call vote:
Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.
The motion passed unanimously, 5-0.

d. 205 CMR 152.03: Criteria for Exclusion – Discussion and Review of Regulation Amendments and Small Business Impact Statement for authorization to begin the promulgation process by Commission (1:40:01)

Associate General Counsel Foxx presented proposed amendments to 205 CMR 152.03. *The proposed amendments to 205 CMR 152.03 and Small Business Impact Statement were included in the Commissioners' Packet on pages 80 through 84.*

Commissioner Brodeur stated that this amendment showed the value of a regulated marketplace which had tools in place to protect those at risk of gambling harm. Chair Maynard agreed.

Commissioner Hill moved that the Commission approve the Small Business Impact Statement and the draft of 205 CMR 152.03 included in the Commissioners' Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner Brodeur seconded the motion.

Roll call vote:
Commissioner O'Brien: Aye.
Commissioner Hill: Aye.

Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.
The motion passed unanimously, 5-0.

e. Litigation Strategy (1:43:24)

Interim General Counsel Stempeck stated that the Legal Division had two topics for executive session and recommended reading the required language for both topics so that they could be addressed in a single executive session.

Chair Maynard stated that the Commission anticipated that it would convene in an Executive Session pursuant to G.L. c. 30A, § 21(a)(3) in conjunction with its review of litigation strategy with respect to Robinhood Derivatives, LLC v. Campbell et al, as discussion at an open meeting may have a detrimental effect on the litigation position of the Commission.

Commissioner O'Brien moved that the Commission enter into executive session on the matter and for the reasons just stated by the Chair. Commissioner Brodeur seconded the motion.

Roll call vote:
Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.
The motion passed unanimously, 5-0.

f. Executive Session Minutes (1:44:44)

Chair Maynard stated that the Commission anticipates that it would meet in executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the intended purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(7) and G.L. c. 4, § 7(26)(n): January 18, 2024 at 11:23 A.M.; G.L. c. 30A, § 21(a)(7) and G.L. c. 4, § 7(26)(f): January 18, 2024 at 12:23 P.M.; and G.L. c. 30A, § 21(a)(6): January 18, 2024 at 4:06 P.M.

Commissioner Hill moved that the Commission enter into executive session on the matter and for the reasons just stated by the Chair. Commissioner O'Brien seconded the motion.

Roll call vote:
Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.
The motion passed unanimously, 5-0.

Transcriber's Note: The Commission entered executive session at 11:54 A.M. and returned to the public meeting session at 12:09 P.M.

6. Community Affairs (2:01:05)

a. FY2027 Community Mitigation Fund Guidelines

Chief of the Community Affairs Division Joe Delaney presented the proposed FY2027 Community Mitigation Fund Guidelines for the Commission's review. He explained that the Community Affairs Division was not seeking a vote on the guidelines at this time. He stated that the guidelines would be posted for public comment and that he would return to the Commission in November for a final vote. *The proposed FY2027 Community Mitigation Fund Guidelines were included in the Commissioners' Packet on pages 87 through 165.*

Chief Delaney stated that there were not a lot of changes regarding project eligibility and that the primary changes were to the grant amounts. He stated that the Community Affairs Division used the guideline amounts from the previous year and pro-rated them as only \$5 million is available for FY27. He noted that a \$300,000 cap was placed on workforce development grants, a \$75,000 cap was placed on public safety grants for District Attorneys' Offices, and a \$75,000 cap was placed on regional planning grants. He stated that depending on what applications were received, there may not be funding for regional planning grants. He stated that the Community Affairs Division would have conversations with the Attorney General's Office to discuss funding.

Chief Delaney stated that the Commission had previously expressed an interest in being able to fund the most impactful projects. He stated that the Commission always had the ability to prioritize funding, but the language in the guidelines was clarified in a couple places. He stated that the Commission could move funds to wherever it saw fit. He stated that there was previously an item regarding suggested grant spending in order to ensure that there were grants in different categories. He stated that the language was removed due to the significant reduction in funds.

Chief Delaney explained that the language regarding the use of a financial waiver was modified due to the reduced amount of funds. He stated that the Community Affairs Division did not expect that there would be any funds available for waivers. He stated that the communities were informed not to rely on financial waivers.

Commissioner Hill stated that he had no issue moving forward with the proposed guidelines. He expressed that he wished the Commission had more funds but that this was the hand the Commission was dealt. He stated that the Commission would do what it could with the funds available. The Commission reached a consensus to put the FY2027 guidelines out for public comment. Chair Maynard stated that the Commission was attempting to be as equitable as possible with what resources were available.

Chief Delaney stated that he would put the guidelines out as soon as possible for two weeks of public comment. He stated that he would return to the Commission at the first meeting in November for final approval.

b. Reappointment Recommendations for Local Community Mitigation Advisory Committee and Subcommittee Members (2:10:52)

Chief Delaney explained that the Commission appoints members to the Local Community Mitigation Advisory Committees (“LCMAC”) every year. He stated that each individual recommended by the Community Affairs Division has been on the LCMACs for some time and that he recommended that each of those individuals be reappointed. He noted that the Commission must also appoint a Commissioner to be on the Subcommittee on Community Mitigation. *The reappointment recommendations for the LCMAC members were included in the Commissioners’ Packet on pages 166 through 170.*

Commissioner Hill stated that he would be happy to be reappointed to the Subcommittee on Community Mitigation but offered to allow another person to take part in this position. The Commission reached a consensus to reappoint Commissioner Hill to the Subcommittee on Community Mitigation.

Commissioner Brodeur asked how people were made aware of the opportunity to serve on one of the LCMACs. Chief Delaney stated that Senior Program Manager Mary Thurlow worked to reach out to members of the communities. He stated that the LCMACs had been stable for a number of years, and when one member leaves, there is typically someone in mind as a replacement. He stated that the Community Affairs Division kept its ear to the ground and was usually able to find someone to step up. He noted that the Subcommittee on Community Mitigation had some gubernatorial appointed positions that remain empty. Chair Maynard stated that the Governor’s Office had to prioritize appointments as there are 4,500 appointments and 800 boards.

Commissioner O’Brien moved that the Commission reappoint Vincent Panzini and David Bancroft to the Region A Local Community Mitigation Advisory Committee and reappoint Joan Kagan Levine, Ellen Patashnick, Richard K. Sullivan, Jr., and Robin Wozniak to the Region B Local Community Mitigation Advisory Committee, all for a term of one year; and further, that Commissioner Brad Hill be designated as the Commission’s representative on the Subcommittee on Community Mitigation. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

c. Town of East Longmeadow Request to Repurpose Community Mitigation Fund Reserve Grant (2:17:56)

Chief Delaney explained that the Town of East Longmeadow had \$13,800 left from a reserve grant and that they wanted to repurpose those funds for another project. *The Town of East Longmeadow's Request to Repurpose Community Mitigation Fund Reserve Grant was included in the Commissioners' Packet on page 170.*

Commissioner Hill moved that the Commission approve the Town of East Longmeadow's request to reallocate the funding remaining in its Reserve Grant in the amount of \$13,801.67 towards funding for development of a visual assessment and analysis of parcels in the Center Town District in connection with its FY 2025 Community Mitigation Fund grant, which included funds for development of a parcel inventory and site readiness assessment, as included in the Commissioners' Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

7. [Finance](#) (2:20:11)

a. Fiscal Year 2025 Budget Closeout Report

Chief Financial and Accounting Officer ("CFAO") Derek Lennon presented the Fiscal Year 2025 Budget Closeout Report with topics including the following: the Racing Oversight and Development Fund, the Sports Wagering Control Fund budget, gaming regulatory costs, final spending, final revenue, and surplus funds. *The budget closeout report was included in the Commissioners' Packet on pages 171 through 185.*

b. [Fiscal Year 2026 Q1 Report](#) (2:26:35)

Budget and Procurement Manager John Scully presented the FY2026 First Quarter Budget Update. He explained that the Commission approved the FY2026 budget on July 1, 2025, totaling \$69.96 million and funding 144 full-time employees. *The FY2026 First Quarter Budget Update was included in the Commissioners' Packet on Pages 186 through 194.*

Manager Scully noted that there were no recommended budgetary increases due to the surplus that was carried forward. He explained that 205 CMR 121 allowed for adjustments to the assessment on licensees as a result of the surplus. He stated that the Commission received the final actual gaming positions as of July 1, 2025 and that gaming licensees' assessments and public health trust fund contributions would be rebalanced proportionally. He stated that the net result was a reduction to the Gaming Control Fund assessment of \$1.97 million, lowering it to \$35 million. He stated there were no changes recommended for the Racing Development and Oversight Trust Fund. He stated costs would continue to be tracked for the Sports Wagering Control Fund.

Manager Scully explained that 205 CMR 221 called for credits to assessments for sports wagering operators as a result of surplus revenues from prior years. He stated that final sports wagering revenue numbers for FY2025 were provided. He explained that the Revenue Team would generate revised FY2026 assessments to the Sports Wagering Control Fund and Public Health Trust Fund based on the operators' proportional share of adjusted gross sports wagering receipts. He stated that the net result was a reduction to the Sports Wagering Control Fund assessment of \$1.37 million, reducing it to \$11.5 million.

CFAO Lennon thanked his team and acknowledged the work the Treasurer and Finance Division performed while he was also working as Acting Chief of Human Resources.

8. [Commissioner Updates](#) (2:32:00)

Chair Maynard inquired as to whether there were any Commissioner updates. He received no response.

9. [Other Business](#) (2:32:09)

Hearing no other business, Chair Maynard requested a motion to adjourn.

Commissioner Brodeur moved to adjourn. The motion was seconded by Commissioner O'Brien.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated October 7, 2025](#)
2. [Commissioners' Packet from the October 9, 2025, meeting](#) (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: October 16, 2025, 11:00 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292

PARTICIPANT CODE: 111 071 9105

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

Commissioners Present:

Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

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

Commissioner O'Brien noted that Chair Jordan Maynard was not available for this public meeting and stated that she would Chair this meeting in his absence.

Commissioner O'Brien called to order the 568th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted. Commissioner O'Brien, Commissioner Hill, Commissioner Skinner, and Commissioner Brodeur were present for the meeting.

Commissioner O'Brien stated that the Commission did not anticipate returning to the public meeting session following Agenda Item 2 and the noted executive session. She stated that she would inquire about agenda item 3, Other Business, before asking for a motion to enter executive session.

2. [Legal](#) (00:56)

Commissioner O'Brien stated that the Commission anticipated convening an executive session in accordance with G.L. c. 30A, § 21(a)(3) to discuss strategy with respect to FBT Everett Realty, LLC v. Massachusetts Gaming Commission, as discussion at an open meeting may have a detrimental effect on the litigating position of the Commission. She stated that the public session of the Commission meeting would not reconvene at the conclusion of the executive session.

Commissioner Hill moved that the Commission go into executive session for the reason stated by Commissioner O'Brien. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Commissioner O'Brien: Aye.

The motion passed, 4-0.

3. [Other Business](#) (00:46)

Commissioner O'Brien asked if there was any other business that was not anticipated. She received no response. The Commission then returned to Agenda Item 2.

Transcriber's Note: The Commission entered executive session at 11:03 A.M. EST and did not reconvene the public meeting session.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated October 14, 2025](#)



TO: Chair Maynard, Commissioners O'Brien, Hill, Skinner, and Brodeur

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

CC: Dean Serpa, Executive Director

DATE: November 6, 2025

RE: AI and Player Risk Identification and Response Research Report

Embedded in the Massachusetts Gaming Commission (MGC)'s mission is a commitment to reduce to the maximum extent possible the negative and unintended consequences of gaming. To fulfill this mandate, the MGC has adopted a [Responsible Gaming Framework](#) with an overarching goal to create an effective, sustainable, measurable, socially responsible, and accountable approach to gambling. The MGC has developed several programs and measures to support this goal. The MGC recognizes the strategies and practices will continue to evolve in response to innovation, technology and new evidence.

To that end, the MGC posted a Request for Information, "Gambling Behavior Risk Identification and Response Technology," in August 2023 seeking information about AI-driven technology solutions to identify and respond to risky gambling behavior. The RFI was designed to gather insight into the key considerations the MGC should account for in determining its approach to risk identification and response technology in the online sports and land-based casino environments.

The MGC wished to build on the insight gained through, but not limited to, the previous RFI by explicitly seeking an objective and comprehensive summary of evidence related to these solutions and environments, as well as input from other stakeholder groups that may not have submitted responses to the previous RFI. As part of its research agenda, the MGC funded the University of Nevada, Las Vegas (UNLV) International Gaming Institute to conduct a study on current and possible uses of artificial intelligence (AI) in the gaming industry, with a particular focus on marketing, player acquisition, and responsible gaming functionality/player health in the Commonwealth.

Attached are the report, research snapshot, and the presentation.



Massachusetts Gaming Commission

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MGC Research Snapshot

AI and Player Risk Identification and Response Research Report

Kasra Ghaharian, PhD, Marta Soligo, PhD, and Jared Bischoff
University of Nevada, Las Vegas International Gaming Institute

August 2025

What you need to know

This report provides a commentary on current and potential uses of artificial intelligence (AI) in gaming, including assessment of the quality and strength of evidence to detect risk of harm using various aspects of player behavior and exploring use of financial data to detect player risk. AI is already embedded in core business functions, with advanced personalization offering both potential benefits for customer experience and potential increased risk of harm to vulnerable populations. Many indicators recommended to detect player risk lacked evidence; payment-related indicators had the strongest evidence for detection of risk. While advancements in technology show promise for financial risk identification, barriers include issues such as lack of cross-operator data sharing, privacy concerns, consent issues, and regulatory barriers. Recommendations for regulators are offered in each area.

What is this research about?

This report focuses on three timely and highly relevant areas as the gaming sector experiences two intersecting lines of growth: the continued expansion of the U.S. gaming market and the rapid advancement of artificial intelligence (AI).

In response to these developments, this report provides a commentary on current and potential AI use cases in the gaming sector. It includes a focused assessment of one specific and increasingly prevalent application: player risk detection. Specifically, the researchers establish an evidence base for behavioral indicators used to identify at-risk players, supported by a structured database that links each indicator to the quality and strength of existing evidence. Finally, the researchers explore an emerging frontier in this space – leveraging financial data to assess players' financial risk. This study was conducted by researchers at the University of Nevada, Las Vegas International Gaming Institute, and was contracted by the Massachusetts Gaming Commission (MGC).

What did the research do?

The authors conducted three studies. First, a focus group study was conducted to identify use cases and associated ethical concerns of current and future applications of AI in the gaming industry. Second, a systematic review of evidence related to behavioral risk identification was completed. Third, in-depth interviews were conducted to obtain a targeted understanding of financial risk identification and the technology that exists to track individual players across operators and gaming modalities. The overarching intent was to provide data and evidence to support informed decision-making regarding regulatory involvement and potential action in each of these areas.

What did researchers find?

Study 1: AI Use Cases

- **AI is embedded across four major operational areas: Operational Efficiency, Customer Relationship Management, Player Experience and Engagement, and Compliance and Risk.** Uses include everything from GenAI for game asset generation and customer service chatbots, to machine learning for anti-money laundering detection and offer optimization.
- **Advanced personalization and agentic AI present challenges.** While they offer potential benefits for customer experience, they may simultaneously increase the risk of harm to vulnerable populations.
- **Regulatory gaps are evident.** While the European Union's AI Act represents the most comprehensive regulatory effort to date, it remains unclear how gambling-specific AI applications will be classified. In particular, use cases involving marketing, personalization, and behavioral nudging may fall into "high-risk" or even "prohibited" categories due to their potential to cause psychological and financial harm.
- **AI maturity varies significantly across the sector.** While online operators may be further ahead, land-based casinos are rapidly adopting new AI capabilities. Third-party providers and specialized companies appear to lead innovation, likely due to greater agility and technical expertise. However, many operators remain cautious, and overall, AI literacy and preparedness, particularly among regulators, lags behind the pace of technological change.

Study 2: BRIDGE Systematic Review

- **Sixty-five unique behavioral indicators were identified**, categorized into five overarching domains: Play, Engagement, Profile Information, Responsible Gambling (RG) Tool Use, and Payments.
- While play indicators appeared most frequently across the literature, **payment-related indicators emerged as the strongest category in terms of evidence**.
- **Several high-profile recommended indicators lack strong academic support**. There may be various reasons for this disconnect, including industry practice outpacing scientific inquiry or challenges in academic access to the breadth of available data.
- **Commercial systems remain opaque**. Many proprietary algorithmic risk detection tools could not be included in the review due to a lack of methodological transparency. This presents a challenge for independent evaluation and regulatory oversight.

Study 3: Financial Risk Identification

- **Conceptual Ambiguity**: There is no universally agreed-upon definition of financial risk in gambling.
- **Technological Potential vs. Implementation Barriers**: Advanced technologies such as open banking, credit reference agency data, and blockchain are currently available to support financial risk identification. However, practical challenges, including data classification difficulties, privacy concerns, consent issues, and uneven adoption rates, significantly constrain their current use.
- **Cross-Operator Data Sharing**: Single-player tracking across multiple operators remains a major challenge, complicated by fragmented data infrastructures, privacy concerns, and competitive market dynamics. Existing solutions, such as GamProtect in the UK and centralized systems in state monopolies, demonstrate feasibility but are limited in widespread application.
- **Regulatory Barriers**: Regulators face significant technical, financial, and capacity challenges in implementing comprehensive risk identification frameworks, which complicate efforts to standardize and enforce effective player protection measures.

Recommendations

- From the first study, recommendations for regulators include to appoint an internal AI champion or task force, support industry training and internal governance, survey licensees' AI use, engage in cross-agency dialogue, and develop formal guidance or policies outlining expectations for the use of AI in gambling.
- From the second study, recommendations include to prioritize evidence-based indicators, adopt standardized reporting frameworks for studies developing or evaluating predictive models related to gambling harm, share underlying data or modeling code to promote transparency and replicability, and develop transparent evaluation frameworks for commercial tools used in harm detection.

About the researchers

Kasra Ghaharian, PhD, Marta Soligo, PhD, and Jared Bischoff are with the University of Nevada, Las Vegas (UNLV) International Gaming Institute (IGI). For more information about this report, please contact Kasra Ghaharian at kasra.ghaharian@unlv.edu.

- From the third study, recommendations for regulators exploring financial risk identification include establishing a clear definition of financial risk, exploring pilot programs such as the UK Gambling Commission's pilot on financial risk assessments, facilitation of cross-operator tracking, investing in robust data systems and technical expertise, assessment of risks for potential displacement to unregulated gambling markets, and evaluating the feasibility of implementing mandatory carded-play tracking systems in land-based venues

Citation

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Key Words

Research Related to Sports Wagering

About this Snapshot

MGC Snapshots are intended to translate lengthy and sometimes technical reports into an easily understandable overview of the research. The findings and recommendations in the Snapshot are those of the researchers and do not necessarily reflect the position of the MGC.

Funding

Financial support for this study came from the Massachusetts Gaming Commission through the Public Health Trust Fund.



UNLV

INTERNATIONAL GAMING INSTITUTE

AI AND PLAYER RISK IDENTIFICATION AND RESPONSE

RESEARCH REPORT

AUGUST 19TH, 2025

PREPARED BY KASRA GHAHARIAN

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PREFACE

AUTHORSHIP

Kasra Ghaharian, Ph.D., is the Director of Research at the University of Nevada, Las Vegas (UNLV) International Gaming Institute (IGI) and serves as the Principal Investigator for all research activities under this project.

Marta Soligo, Ph.D., is an Assistant Professor in the UNLV College of Hospitality and Director of Tourism Research at UNLV Office of Economic Development. Dr. Soligo's primary contribution was to the qualitative components of this research.

Jared Bischoff is a Ph.D. student in the College of Hospitality at the University of Nevada, Las Vegas. Bischoff's primary contribution was to the systematic literature review, where he assisted through all stages of the review.

FUNDING

This project was financially supported by the Massachusetts Gaming Commission. The one-year project was competitively bid and awarded to IGI in July 2024. As with all contracted research and related projects at IGI, the research team retains final editorial control over content disseminated via this report and any related presentations and publications that may follow.

REPORT STRUCTURE

IGI assembled a team to execute the research plan detailed in our RFP response to the Massachusetts Gaming Commission. This included a focus group study on artificial intelligence use cases, a systematic literature review on behavioral risk indicators, and an in-depth interview study on financial risk identification. Accordingly, the report is presented in three primary sections corresponding to each study, preceded by an executive summary highlighting key findings from across the project.

The report is intended for a broad audience of policymakers, regulators, gambling operators, and academics. We therefore aimed for a more accessible writing style and report structure, less detailed than a formal academic manuscript but without compromising the rigor and analytical depth of the research. As the reader will observe, the issues explored are complex and often without straightforward solutions. These topics warrant continued dialogue, and any associated regulatory actions should be paired with careful evaluation.

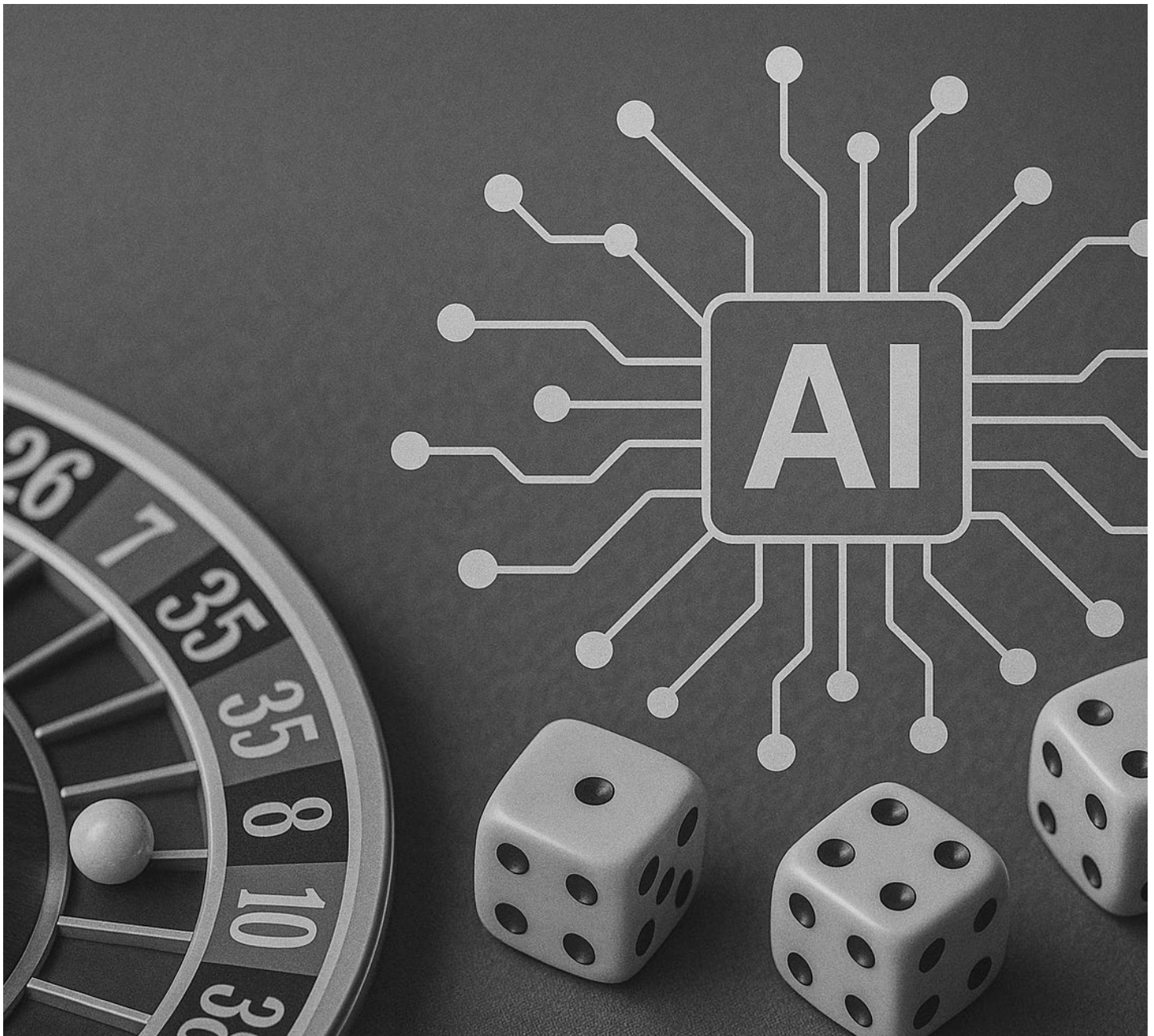
ACKNOWLEDGEMENTS

We would like to acknowledge the research assistants and scientists at IGI who contributed to this project, particularly in assisting with data extraction and coding as part of the systematic literature review. Their diligence and attention to detail were instrumental to the success of this work.

We thank the members of the Commission's Research Review Committee for their helpful and constructive comments.

We thank the Massachusetts Gaming Commission for its leadership at the frontier of gambling regulation and for supporting this important and timely work. As artificial intelligence continues to evolve and influence society, research support is essential to ensure the benefits of this technology are maximized while minimizing potential risks and harms.

We acknowledge that, while this report was authored by human researchers, the writing process was supported by the use of AI tools. Specifically, the authors used ChatGPT to assist with tightening language and copy-editing early drafts. The workflow involved researchers drafting the original content, with AI tools used as part of the revision and editing process. In addition, some aesthetic report images were generated using ChatGPT.



OVERVIEW

This report focuses on three timely and highly relevant areas as the gaming sector experiences two intersecting lines of growth: the continued expansion of the U.S. gaming market and the rapid advancement of artificial intelligence (AI).

In response to these developments, this report provides a commentary on current and potential *AI use cases* in the gaming sector. It includes a focused assessment of one specific and increasingly prevalent application: *player risk detection*. Specifically, we establish an evidence base for behavioral indicators used to identify at-risk players, supported by a structured database that links each indicator to the quality and strength of existing evidence. Finally, we explore an emerging frontier in this space – leveraging financial data to assess players' *financial risk*.

EXECUTIVE SUMMARY

The purpose of this report was threefold. First, via a focus group study, to identify use cases and associated ethical concerns of current and future applications of AI in the gaming industry. Second, to complete a systematic review of evidence related to behavioral risk identification. Third, via in-depth interviews, to obtain a targeted understanding of financial risk identification and the technology that exists to track individual players across operators and gaming modalities. The overarching intent is to provide data and evidence to support informed decision-making regarding regulatory involvement and potential action in each of these areas.

Accordingly, the report is structured into three primary sections, each corresponding to one of the studies. For each study, we provide a brief introduction, followed by the methods and results, and conclude with a concise summary of key findings, limitations, and recommendations.

REPORT HIGHLIGHTS

Study 1 AI Use Cases

- **AI is embedded across four major operational areas: Operational Efficiency, Customer Relationship Management, Player Experience and Engagement, and Compliance and Risk.** Use cases include everything from GenAI for game asset generation and customer service chatbots, to machine learning for AML detection and offer optimization.
- **Land-based and online operators are converging in their AI capabilities.** Participants noted rapid innovation in land-based settings, challenging the traditional assumption that online operators are inherently more advanced.
- **Advanced personalization is viewed as a double-edged sword.** While improving engagement, it also raises ethical risks around targeting vulnerable individuals, especially if demographic or behavioral data is misused.
- **Concerns were raised about the use of foundation models (e.g., GPT-n series, Claude, etc.).** Risks such as prompt manipulation, opaque training data, and use in customer facing applications suggest a need for sector-specific safeguards and governance strategies.
- **Regulatory gaps are evident.** While the European Union's AI Act represents the most comprehensive regulatory effort to date – setting a high bar with its risk-based governance framework – it remains unclear how gambling-specific AI applications will be classified. In particular, use cases involving marketing, personalization, and behavioral nudging may fall into “high-risk” or even “prohibited” categories due to their potential to cause psychological and financial harm.
- **AI maturity varies significantly across the sector.** Third-party providers and specialized companies appear to lead innovation, likely due to greater agility and technical expertise. However, many operators remain cautious, and overall, AI literacy and preparedness, particularly among regulators, lags behind the pace of technological change.

Study 2 BRIDGE – Systematic Review

- **A total of 68 studies were included in the review**, consisting of 25 descriptive studies and 43 predictive studies. Descriptive studies focused on identifying behavioral patterns and player subgroups, while predictive studies aimed to classify players at risk of gambling harm using machine learning or statistical models.

- **Sixty-five unique behavioral indicators were identified**, categorized into five overarching domains: Play, Engagement, Profile Information, Responsible Gambling (RG) Tool Use, and Payments. Each indicator was assigned a BRIDGE Score, which reflects both the frequency of its appearance and the methodological quality of the supporting studies.
- **Payment-related indicators emerged as the strongest category in terms of evidence.** While play indicators appeared most frequently across the literature, payment indicators – such as deposit number and amount – consistently ranked highest in BRIDGE Score, reflecting both frequency and evidentiary quality. Five of the top ten indicators were related to payment transactional behaviors.
- **Several high-profile recommended indicators lack strong academic support.** For example, “customer-led contact” and RG tool use are frequently cited in guidance documents but appear infrequently and are poorly supported in the literature. There may be various reasons for this disconnect, including industry practice outpacing scientific inquiry or challenges in academic access to the breadth of available data.
- **Study quality and reporting practices vary widely.** Many predictive modeling studies used large datasets and sophisticated methods but failed to disclose adequate performance metrics or data-processing procedures. Standardized reporting and greater openness with data and code are needed to improve transparency and reproducibility.
- **Commercial systems remain opaque.** Many proprietary algorithmic risk detection tools could not be included in the review due to a lack of methodological transparency. This presents a challenge for independent evaluation and regulatory oversight.

Study 3 Financial Risk Identification

- **Financial risk in gambling remains underdefined and underexplored.** While financial harm is widely recognized as a core dimension of gambling-related harm, there is no consensus on what constitutes “financial risk.”
- **Tracking players across operators remains limited but evolving.** While single-wallet systems in monopolistic markets allow centralized tracking, most jurisdictions lack the infrastructure or legal frameworks to enable seamless cross-operator data sharing. Emerging models, such as the UK’s GamProtect and the U.S. Responsible Online Gaming Association’s clearinghouse, offer promising paths forward.
- **A range of technologies, including FinTech, could enhance harm detection.** Open banking, credit reference agencies, and global self-exclusion programs were identified as underutilized tools for identifying financial distress related to gambling.
- **Open banking presents both promise and pitfalls.** While it enables granular analysis of consumer financial behavior, concerns remain around data quality, user adoption, and operator accountability. Some operators may be disincentivized from leveraging such tools, fearing increased scrutiny or regulatory liability. Additionally, open banking frameworks vary in their maturity across jurisdictions.
- **Barriers to implementation are significant.** Interviewees cited outdated systems, fragmented data, legal constraints, and low regulatory technical capacity as key obstacles. Cultural and political resistance, especially in the U.S., was also noted, with participants pointing to a reluctance to regulate personal financial behavior.

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STUDY 1 – AI USE CASES

In 1950, Alan Turing posed the question: “Can machines think?” (Turing, 1950). Six years later, a group of researchers convened at Dartmouth College to formalize the study of this question and settled on the term *artificial intelligence*. Interestingly, this term won out over alternatives like “automata studies,” as it was better able to attract academic interest and, perhaps most importantly, funding. The term reflected the scale of the field’s ambitions and positioned itself in deliberate competition to human intelligence. Thus, as Hao (2025) pointedly suggests, the term was a “marketing tool from the very beginning” (p. 90).

While advances in AI had been accelerating during the first decades of the 21st Century, OpenAI’s development of the “GPT-n” series (and subsequent release of ChatGPT in November 2022) brought AI (and the foundational technique behind it – deep learning) into the mainstream¹. Since then, the marketing power of the term “AI” has erupted. AI is now used to describe a vast range of technologies and applications, many of which precede ChatGPT (Hue & Hung, 2025). Companies are branding with “AI” in their names and using “.ai” domains (Munjal, 2024). Analytics firms that have leveraged machine learning and statistical techniques for years are now re-labeling their work as AI, whether by choice or a competitive necessity. And when people say they’re “using AI,” they’re likely not writing code or building algorithms; they’re using chatbots (e.g., ChatGPT, Claude, Gemini, etc.) built for mass adoption.

This makes for an interesting moment in the gambling industry, where the term “AI” is increasingly used but not always well understood, particularly given the diverse range of stakeholders in the sector and the wide array of potential applications. Additionally, while gambling is enjoyed as a recreational activity by most individuals, for a small minority it can lead to serious negative consequences (Potenza et al., 2019). Given this, the sector already faces heightened regulatory scrutiny, and the adoption of AI can introduce new ethical considerations and risks, which may or may not be accommodated by existing regulatory frameworks (Ghaharian et al., 2024). Compounding this is the uncertain and evolving landscape of broader AI regulation: from multi-national to state-level efforts.

At the international level, the European Union’s Artificial Intelligence Act (EU AI Act) stands out as the first comprehensive and enforceable AI-specific law (for a high-level summary of the Act see: Future of Life Institute, 2024). It implements a risk-based framework, categorizing AI systems across four tiers: (1) unacceptable, (2) high, (3) limited, and (4) minimal. Under the Act, practices like social scoring and exploiting vulnerabilities are prohibited, and strict compliance obligations are enforced for systems categorized in the high-risk tier. It also differentiates between the type of entity and their AI systems². Importantly, like the EU’s General Data Protection Regulation (GDPR), the EU AI Act has an extra-territorial scope, meaning that it will impact companies using AI systems who are based outside of EU jurisdiction.

In the US, AI regulation is fragmented and its future increasingly uncertain. Federal agencies like the National Institute of Standards and Technology (NIST) have provided voluntary standards, but it is at the State-level where we are seeing the introduction of more enforceable approaches. For example, Tennessee’s Ensuring Likeness Voice and Image Security (ELVIS) Act was enacted in 2024 to protect artists from AI-generated media (e.g., music, performances, etc.). While a comprehensive review of State-level AI regulations is out of scope for this report, we recommend Lozoya Martinez (2025) for an in-depth analysis. However, at the time of writing, the future of State-level efforts remains uncertain, as a

¹ OpenAI is an artificial intelligence company that developed the Generative Pre-trained Transformer (GPT) series of language models. These models are trained on vast amounts of text and can generate human-like responses to questions and prompts. The release of ChatGPT in 2022 made this technology widely accessible to the public (reaching 100 million users in just 2 months) and significantly accelerated interest and use of AI across industries.

² The EU AI Act defines two principal actors: *providers*, who develop AI systems or general-purpose AI models, and *deployers*, who use these systems under their authority in professional contexts. For example, companies like OpenAI and Google (developers of general-purpose systems ChatGPT and Gemini) would be considered providers. In the gambling sector, most operators are likely to be deployers, implementing AI systems developed by third parties. But there are also many specialist providers creating AI tools to support specific functions discussed later in this report (e.g., fraud detection, player protection, etc.). However, some operators may also act as providers if they develop AI systems in-house to support business functions.

recent provision in a federal budget bill would prohibit states from enacting or enforcing their own AI regulations for the next 10 years (Bhuiyan, 2025), potentially shifting the onus of responsibility to sector-specific regulatory bodies.

OBJECTIVES

Given the rapid pace of development in AI and its increasing adoption within the gambling sector, this study comes at a critical time. To support regulatory decision-making and distinguish real-world applications of AI from marketing rhetoric, this study had two core objectives:

- To explore uses of AI in the gambling industry.
- To explore the associated risks and ethical considerations.

While we took a broad exploratory approach to these objectives, we also made an effort to examine the use of AI in specific areas (as requested in the RFP): marketing, player acquisition, and the detection of underage gambling. We employed a focus group study design and the following research questions guided our approach:

- RQ1: How do participants define the current uses of AI in the gambling industry?
- RQ2: What do participants believe are the possible future uses of AI in the gambling industry?
- RQ3: How do participants perceive the applications of AI specifically to support marketing, player acquisition, and the detection of underage gambling?
- RQ4: What do participants believe are the risks and ethical considerations associated with current and future AI applications in the gambling industry?
- RQ5: How do participants believe forthcoming or proposed AI regulations (e.g., the EU AI Act) will impact the gambling industry?

METHODS

We pre-registered our research questions and analysis plan prior to data collection and analysis. The full pre-registration, which outlines our methodology in detail, is available at <https://osf.io/snqwt>. For brevity, key methodological details are summarized below. The study's protocol was reviewed and approved by the University of Nevada, Las Vegas Institutional Review Board.

We employed a qualitative focus group design to address our research questions. Given the specialist nature of the topic, we recruited participants via a purposive and convenience sampling approach. Participants were recruited and selected to represent one of three key profiles:

- *Gaming industry AI experts* with direct experience developing or deploying AI tools in gambling contexts.
- *Gaming industry domain experts* with expertise across the breadth of gaming operations including marketing, player acquisition, responsible gambling, or detecting underage gambling.
- *General AI experts* from industry, academia, or policy settings with advanced knowledge of AI systems and/or AI governance.

A diverse sample was recruited, which allowed us to structure each focus group with at least one participant from each of the three profiles. This allowed for productive exchanges across domain areas and encouraged interdisciplinary discussion.

Participants' professional experience spanned a range of jurisdictions (including North America, Europe, Asia, and Australia) and covered both online and land-based gambling operations. The two focus group participants are described in Table 1.

Table 1 - Focus Group Participants

Participant (group)	Profile	Key experience and expertise
1 (A)	Gaming AI expert	▪ >10 years experience online gaming (North America & Europe). ▪ Founded an AI-based player risk detection software company. ▪ Advisor to gambling regulators and harm prevention non-profits. ▪ AI-based work in journals and conferences.
2 (A)	Gaming AI expert	▪ >30 years experience online gaming with C-level roles (Europe). ▪ CEO AI services start-up. ▪ Advisor to gambling regulators and harm prevention non-profits.
3 (A)	General AI expert	▪ >10 years experience of practice in AI law, advising US & EU companies. ▪ Partner at an international law firm. ▪ Written on AI and serves on government advisory boards related to AI.
4 (A)	Gaming domain expert	▪ >30 years experience in gaming (US). ▪ Manages US gaming practice for global consulting firm. ▪ Experience and focus on land-based operations.
1 (B)	Gaming AI expert	▪ >30 years experience in gaming (US, Asia, Australia). ▪ CEO gaming analytics consulting firm. ▪ Experience and focus on land-based operations and CRM.
2 (B)	General AI expert	▪ >10 years experience in AI (Europe). ▪ CEO Technology Due Diligence platform. ▪ CTO AI consultancy firm (including finance, healthcare, retail, marketing).
3 (B)	Gaming AI expert	▪ >20 years experience in online gaming (North America & Europe). ▪ Founded an AI-based player risk detection software company. ▪ AI-based work in journals and conferences.
4 (B)	Gaming domain expert	▪ >10 years experience in gaming (US). ▪ VP at nation-wide gaming operator. ▪ Focus on marketing and analytics in land-based gaming.

Two researchers were present during each focus group. KG led the discussion using a structured interview protocol, while MS observed and contributed follow-up questions. Both researchers probed for clarification or elaboration as needed. Following the sessions, three members of the research team (KG, MS, and JB) analyzed the audio recordings and transcripts independently. Coding was applied to categorize AI use cases, and for the remaining research questions, coding was used to highlight key points and insights raised by participants. Findings were discussed collaboratively to ensure consistency and mitigate potential individual biases. We wrote up the results based on this analysis and included selected participant quotes to illustrate key themes or ideas. We did adjust some quotes, but this was limited to small edits to ensure clarity, grammar, and length without altering meaning. In the results that follow, where applicable, we support and contextualized our findings with relevant real-world examples. These examples were either provided by participants or identified during the writing phase of this report. These examples help visualize how such use cases are being implemented.

FINDINGS

Current AI Use Cases

Focus group participants described a wide range of current AI applications in the gambling industry. These ranged from more “traditional” approaches – such as predictive analytics and machine learning – to newer developments like natural language processing (NLP) and large language models (LLMs)³. But as we noted in the introduction, participants acknowledged that the term “AI” is now widely used. As one participant remarked:

³ For a primer on machine learning see Bi et al. (2019). For a primer on Generative AI, including LLMs, see Feuerriegel et al. (2024).

“The same methods have been applied in the 1990s and early 2000s. But the computational power simply wasn’t there. Now you have that power, and you can process so many different data points. What we used to call machine learning, now we gravitate to the term AI.”

Our analysis of the transcripts identified four core themes representing current AI use cases in the gambling industry. These are presented in Table 2, alongside corresponding use case areas and example applications identified by the focus group participants.

Table 2 – AI Use Case Themes Identified by Focus Group Participants

Theme	Use Case Areas	Example applications
Operational Efficiency and Workforce Augmentation	Policy and documentation	Using LLMs to draft internal HR policies
	Coding	Analysts using Copilot to write and review code
	Content generation	GenAI tools to create slot machine assets (e.g., graphics)
	Task support / communication	Drafting emails and copywriting, troubleshooting, etc.
	Reporting and analytics	LLMs used to interpret analyses and extract key findings
	Business optimization	Staffing forecast models integrated with LLMs
Customer Relationship Management	Player valuation	Using machine learning to identify high value players
	Offer optimization	Using predictive models to calculate elasticity estimates
	Campaign personalization	GenAI to tailor content using player data and preferences
	Acquisition strategy	Models to optimize cost per acquisition
	Asset optimization	Models for allocation of room comps
Player Experience and Engagement	Personalization	Automatically select coin sizes for online slots
	Recommender systems	Recommending games based on peer groups
	Augmented content	Using vision AI to overlay data on live sports feeds
	Customer support	Customer service chatbots trained on policies and FAQs
	Behavioral nudging	Automated prompts to influence deposit behavior
Compliance and Risk	RG – risk identification	Machine learning models to assess player harm potential
	RG – messaging	Automated based on thresholds (e.g., spending or time)
	AML	Detection of suspicious transactions and bonus abuse
	KYC	Vision AI for player identity verification
	Security	Vision AI to detect firearms
	Bad actors (customers)	Using AI for location spoofing and deepfakes

Theme 1: Operational Efficiency and Workforce Augmentation

When asked about the current uses of AI in the gaming industry, some interviewees started by highlighting the lack of investment in technological innovations that has characterized the gambling industry, especially land-based casinos, over the past several decades. In such a context, companies are starting to welcome AI-based solutions positively. One of the most prominent themes in current AI applications is back-office operations, with respondents mentioning activities such as human resources management, cybersecurity, technology development, procurement, finance, marketing, and customer support being augmented by AI-based solutions.

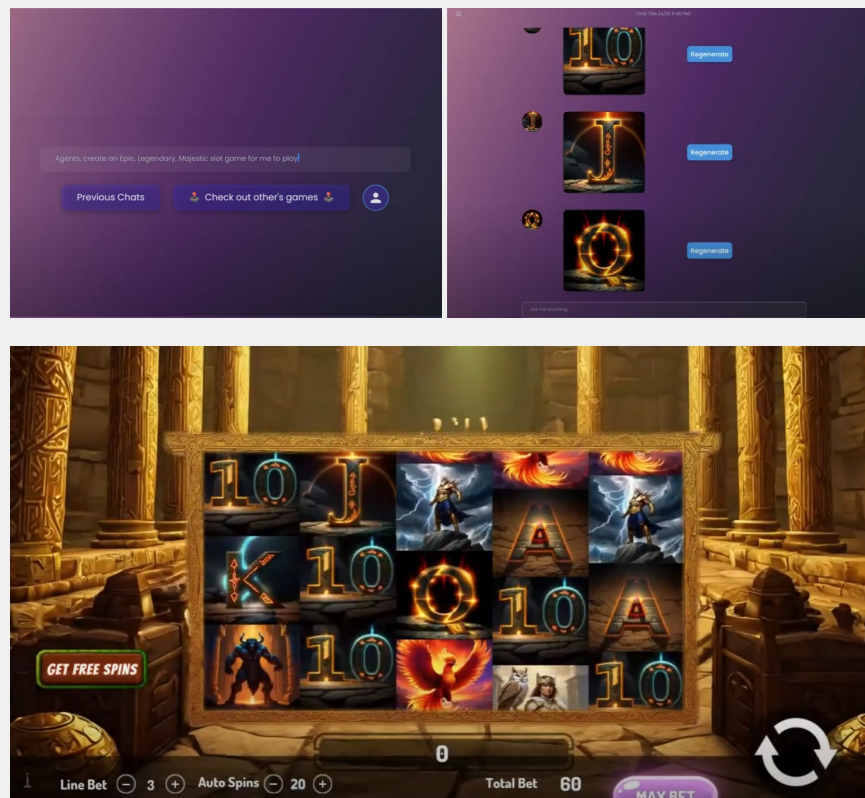
Interviewees explained that gaming stakeholders are increasingly adopting AI-based strategies for efficiency reasons, noticing a growing trend in the use of LLMs. A participant underlined that, compared to human labor, LLMs can accomplish complex tasks, such as coding, in a much shorter amount of time. An example in this sense was game design and graphics. Firstly, in a context where employees work under pressure to continuously and quickly create new content, AI can provide prompt solutions – generating outputs in a fraction of the time it would take a team of workers to accomplish. Secondly, the use of AI can reduce the high costs associated with hiring, for example, artists and graphic designers.

“The pressures to get new content out at speed is huge. AI is perfect. Suddenly you’ve got a room full of developers.”

Box 1 highlights a current example of this trend, where a company has developed a generative AI based solution to support slot game design.

Box 1 – AI for game design

XGENIA is a third-party provider that uses generative AI to rapidly produce slot games. Their website advertises the ability to “Design, build and deploy your game ideas within minutes, eliminating legacy development times and costs” and slogans like “New games in minutes. Not months.” (XGENIA, Inc, 2025). Their YouTube channel⁴ present product demos, demonstrating “text to game”:



Beyond design and development, participants shared a range of use cases demonstrating how LLMs are already being integrated into daily workflows. Human resources and compliance teams, for example, are using LLMs to draft internal policies. Copywriters are using multiple consumer-facing chatbots, such as ChatGPT, Claude, and Perplexity, to generate marketing copy, often combining outputs and editing them for tone or brand alignment. One participant also described how a compliance team was experimenting with LLMs to identify potential loopholes in regulatory language.

Theme 2: Customer Relationship Management

This theme captures how operators use AI to manage player relationships, value, and lifecycle to optimize business outcomes. Participants’ discussion touched on themes such as analyzing both player preferences and customer value. While there is some overlap with Theme 1 – particularly in the use of AI to support internal functions – here the focus is on how these tools specifically enhance customer relationship management (CRM). For example, participants noted how AI (particularly GenAI and LLMs) can assist with tasks like copywriting and interpreting player data within marketing and CRM contexts.

⁴ <https://www.youtube.com/@xgenia>

Notably, participants highlighted important differences between online and land-based settings. Land-based casinos, in particular, have historically struggled with fragmented and legacy data systems that limit the ability to build a complete view of the customer. However, participants described how new AI systems are beginning to overcome these limitations. One participant explained that the industry is moving away from the long-held aspiration of building a “360-degree view” of each customer – a single, unified record that aggregates all customer information. Instead, today’s AI systems are enabling operators to extract only the relevant insights from disparate and legacy data sources without the need to harmonize them into a central system. Thus, AI is driving a paradigm shift in how customer data is managed and applied.

A recurring theme across the focus groups was the use of AI to improve efficiency, and this was particularly salient in discussions on CRM. As one participant explained, the most durable and successful applications of AI have involved “scaling insights and best practices across the entire player database.” For example, AI systems are now being used to automate many of the tasks traditionally performed by casino hosts, such as estimating what players are likely to spend on their next visit, determining where players sit within their lifecycle, and tailoring reinvestment offers accordingly. AI-based techniques allow operators to model player value and elasticity in ways that are more precise and that streamline decision-making. Much like the earlier observation that AI transforms a single designer into a “room full of developers,” here it could transform a single expert host into a whole team of CRM experts.

A broader takeaway from participants was the use of AI to leverage the multitude of data points that characterize customer behavior and preferences. Many of these applications, such as analyzing frequency of visits, spend levels, and recency of play, are already well-established in marketing, but participants emphasized how AI now enables operators to use this information in a more automated and dynamic fashion. For example, to optimize the timing of marketing interventions, tailor offers more precisely, and improve cost-per-acquisition (CPA) models across both online and land-based settings. In addition to gaming-specific behaviors (e.g., game preferences, typical bet sizes), there is growing interest amongst land-based operators in using AI to understand non-gaming behaviors including, for example, resort usage, dining habits, and other ancillary spend to inform marketing and asset allocation decisions. One participant suggested that such data helps “asset optimization,” ensuring room comps are provided to the “right player.” In online settings, one participant described the use of AI to generate what they referred to as the “next generation of clickbait,” content designed to strategically direct players to specific websites (in the case of affiliate marketing) or offers using personalized statistical insights.

Theme 3: Player Experience and Engagement

This theme focuses on how AI enhances the real-time player experience through personalization and support. Participants described a range of applications focused on personalization, tailored support, and dynamic content delivery, many of which aim to mirror or build upon AI applications seen in other consumer industries such as retail and streaming services (e.g., Netflix).

A commonly cited example was the use of “hyper-personalization” to tailor the gambling experience to individual players. Interviewees described how AI systems are now capable of personalizing aspects of the experience such as recommended games (drawing comparisons to Netflix-style recommender engines), optimal coin sizes on slots, and suggested deposit amounts based on individual player behavior. As one participant put it:

“What is the sweet spot of deposit value that keeps the player depositing? You don’t want to try and squeeze too hard. You don’t want to leave money on the table.”

Several current examples illustrate how these personalization strategies are already being used. For example, 888.com outlines how its AI-driven recommendation engine tailors content based on players’ past activity and preferences (888.com, 2025). Golden Matrix Group has launched a system that separates suggested games into “Games You’ve Tried” and “Games You Might Like,” updated daily based on a player’s latest behaviors (Bentham, 2024).

Sports betting was described as a particularly advanced area for AI-driven engagement. Participants highlighted use cases involving real-time data overlays, predictive analytics for event outcomes, and “snippets of auto-generated news.” One participant specifically pointed to Sportradar – a leading sports data company – as being at the frontier of leveraging AI in the gaming sector. As noted on their website: “Our engagement tools take historical and live data and present it in an eye-catching, intuitive way. So your customers stay longer, click more and bet more” (Sportradar, 2025). Among their innovations, Sportradar has used AI to support the development of micro-bets, which describe opportunities to wager on discrete in-game events rather than overall outcomes. For instance, the company claims its systems can generate approximately 1,500 new betting opportunities per tennis match (e.g., the next break point, who will serve the next ace, and the last stroke type) (Sportradar, 2024). Additionally, its “4Sight Streaming” product integrates AI vision technology to overlay real-time statistics and insights directly onto live video, giving players instant access to dynamic, personalized betting options.

Participants also emphasized the growing role of AI in customer service and support. LLMs are increasingly being trained on internal resources – e.g., company policies, training manuals, and FAQs – to power multilingual chatbots capable of delivering consistent, 24/7 assistance. This functionality is particularly valuable in regulated markets with diverse player bases, where the demand for scalable, multilingual support is high. As one participant put it:

“LLMs will take all your training literature, and it will give you a customer service agent with the equivalent of 3 to 6 months experience out of the box.”

Importantly, AI-powered support is not limited to text-based web chats. Companies like Poly.ai are demonstrating how lifelike voice assistants can be deployed to enhance customer interactions across various different sectors (PolyAI Ltd., 2025). Among Poly.ai’s gaming clients are Caesars Entertainment, Boyd Gaming, and Landry’s. In a case study featuring The Golden Nugget hotel and casino, Poly.ai implemented an AI voice assistant to handle room reservations, guiding customers through the booking process in a way that “feels natural and friendly but still follows business logic.” (PolyAI Ltd., 2025).

Theme 4: Compliance and Risk

This theme captures how AI is being applied to support compliance functions and mitigate risk across key areas, including responsible gambling (RG), anti-money laundering (AML), know-your-customer (KYC), and security.

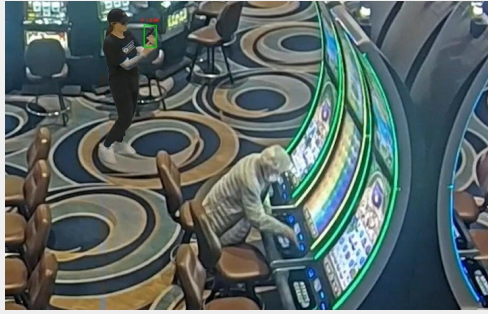
RG was one of the most frequently discussed areas. While participants acknowledged that AI is being used to detect gambling-related harm, they noted that the level of sophistication varies widely. As one participant put it, some current practices remain relatively “primitive,” relying on traditional statistical methods. For instance, FanDuel launched a consumer dashboard called My Spend in December 2024, which simply displays players’ spending and winnings (Betfair Interactive US LLC, 2025). In contrast, more advanced examples referenced algorithmic risk detection systems – developed both in-house and by third-party vendors – that analyze behavioral tracking data to identify potentially problematic play patterns.

Participants highlighted that AI use is prevalent in online settings to support AML efforts, prevent bonus abuse and account takeovers, and improve identity verification. These practices may be performed in-house or via third party providers. For example, Frogo.ai is a technology provider that claims to use AI to detect fraudulent activity in the online gambling sector (Davies, 2025).

In land-based casinos, participants spoke to how AI-powered computer vision is increasingly used to enhance surveillance and customer tracking. Box 2 provides some examples that support the participants’ statements.

Box 2 – AI in land-based settings

ZeroEyes has developed AI technology that can detect the presence of firearms on patrons, which is currently in use at the River Spirit Casino in Tulsa, Oklahoma (Takahashi, 2023).



Xailient, a company specializing in computer vision applications, has partnered with Konami to develop a product entitled “SYNK Vision,” which they claim replaces the need for physical player cards through facial recognition. Additionally, this system is advertised to support harm minimization by alerting staff to signs of distress and enabling timely interventions (Konami Gaming, Inc, 2024).

Viso.ai partnered with a casino to implement a real-time crowd-counting application using computer vision, which tracks occupancy via existing surveillance cameras to ensure compliance with capacity limits (Viso.ai, 2025).



Finally, participants raised concerns that AI can be exploited by bad actors to circumvent compliance processes. The UK Gambling Commission recently flagged this issue in its updated guidance on terrorist financing and financial crime (Gambling Commission, 2025b). They note a rise in the “scale and sophistication of attempts to bypass customer due diligence checks using false documentation, deepfake videos and face swaps generated by artificial intelligence.” Notably, it appears that accounts created using such methods are more likely to be linked to criminal activities such as money laundering and terrorism financing.

Future Use Cases

Novel Data Sources Powering Novel Use Cases

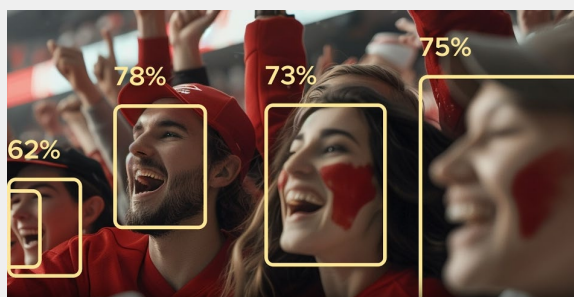
While not AI applications in themselves, participants spoke to how novel data sources are enabling new and more advanced AI use cases. A clear example comes from the land-based sector, where tracking player behavior at table games has historically been a challenge due to the absence of mechanisms – like those in online or electronic gaming machines – that capture player activity on a bet-by-bet basis. But with the introduction of radio frequency identification (RFID)-enabled chips and tables, as well as computer vision systems, this gap is beginning to close. For example, one participant highlighted Walker Digital Table Systems as an example of a company at the frontier of this space, who have developed “smart table” technology that allows for detailed tracking of wagering activity. These data can be used not only to enhance player ratings and support loyalty and marketing initiatives but also to bolster compliance and harm prevention (as discussed earlier) (Walker Digital Table Systems, LLC, 2025).

Moreover, data is no longer limited to numbers in spreadsheets. Text, video, audio, and visual feeds can all be used as inputs for “multi-modal” AI systems. As highlighted earlier, camera feeds are already being leveraged for compliance and risk purposes, and participants expect these applications to expand. Interestingly, several participants speculated that the players themselves may become a source of input data, with systems capable of extracting information from a person’s “static” appearance (e.g., via an image) as well as their real-time emotional states (e.g., via video).

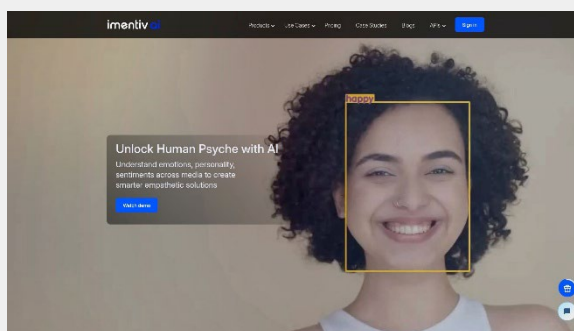
Building on the theme of “hyper-personalization,” one participant described how companies in the retail sector are already using vision AI systems to recommend products based on customers’ visual appearances. Another suggested that facial expression analysis during gambling play could be used to detect emotional states in real time, enabling applications ranging from personalized marketing to player protection (e.g., identifying signs of distress). In Box 3 we highlight some existing commercial and academic efforts, which provide examples that support these participants’ forecasts.

Box 3 – AI and facial recognition: commercial and academic efforts

MoodMe has developed “AI facial emotion recognition” (MoodMe, 2025). One of their product features include an “Emotion FanCam” that identifies moments in live sporting events – such as the joy of a goal or the tension of a close match – to enhance brand engagement on digital signage and in-stadium advertisements. Such content could be leveraged by any brand – including gaming companies – to use in promotional materials. Perhaps, the use case could be re-purposed for the casino floor or other gaming environments.



Imentiv AI advertises a product designed to augment the work of mental health professionals by providing real-time emotional assessment using AI (Imentiv, 2025). This AI-driven and real-time feedback could help clinicians better understand a patient’s emotional state and reactions during therapy sessions.



Sadeghi et al. (2024) explored automated depression detection, using LLMs to extract depression-related indicators from interview transcripts. Their prediction model was trained on PHQ-8 scores, and they further incorporated facial data extracted from video frames to build a multimodal model. Interestingly, they found that a text-only approach yielded robust performance. Nepal et al. (2024) developed MoodCapture, which uses images to detect signs of depression. In their study, researchers collected more than 125,000 naturalistic images – captured from participants’ front-facing smartphone cameras during daily life – from 177 individuals diagnosed with major depressive disorder. By linking photo features such as angle, lighting, and color to self-reported PHQ-8 depression scores, they trained a random forest model to effectively predict raw PHQ-8 scores.

Instantaneous Information Delivery

Participants highlighted the growing role of AI in enabling instant access to relevant information, both for internal operator use and customer-facing applications. Several participants emphasized how LLMs could assist customer support staff by translating complex model outputs into natural language, which would be particularly useful in supporting safer gambling interactions. For example, while risk detection systems may be effective at flagging a potential at-risk customer, the reason for the flag may not be clear to individuals unfamiliar with the model’s development process, variable naming conventions, or underlying logic.

One participant also emphasized the value of using LLMs to “pull out what’s important” from large-scale marketing analyses, highlighting how this capability could enhance both communication and decision-making (e.g., between analysts and customer service agents). While this use case is already emerging, it has the potential to become more widespread. For example, Gaming Analytics.ai currently offers an AI platform tailored for land-based casinos, featuring an “AI-driven search” function that enables users to query casino databases using natural language (Gaming Analytics, 2025).

This instant access to information is not limited to staff. Participants also envisioned a future where players themselves interact with conversational interfaces instead of navigating static menus. As one participant described:

“So instead of the user having to navigate around the website, they can just ask what they want. And then, basically, the website comes back, is this what you want, or even place a bet.”

Agentic AI

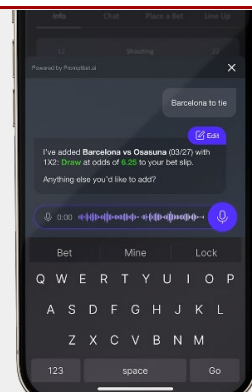
Agentic AI can be described as “a category of AI systems capable of independently making decisions, interacting with their environment, and optimizing processes without direct human intervention” (Hosseini & Seilani, 2025). This was viewed by participants as being particularly transformative with applications across a wide array of gaming industry functions. Importantly, agentic systems have the potential to not only make one-time decisions but orchestrate entire workflows for both operators and customers.

Examples included AI agents that autonomously analyze live sporting events and generate real-time micro-betting markets, agents that handle marketing workflows by assessing player eligibility, crafting offers, and distributing communications, and agents that interact directly with players to conduct personalized safer gambling conversations.

Some participants imagined AI agents acting on behalf of the player themselves: analyzing odds, recommending bets, or even placing wagers on behalf of bettors using “function-calling” capabilities. In fact, this may already be a reality, as highlighted in Box 4.

Box 4 – Sports Betting AI Agent

Promptbet.ai may be an early example of this shift to agentic solutions, offering a conversational interface that responds to user inputs (typed or spoken) with betting options and product suggestions (Unblocked Labs GmbH, 2025).



Participants also discussed how agentic AI could be used to develop and test new game variants, including optimizing features like return-to-player (RTP) rates dynamically, thereby reducing the need for manual design and testing.

Risks and Ethical Considerations

Throughout the focus groups, participants were asked to reflect on the potential risks and ethical considerations associated with both current and emerging AI applications in the gambling sector. These conversations revealed several concerns related to marketing practices, model outputs, agentic and conversational AI, data provenance, explainability, and human understanding of AI systems.

Marketing and Personalization

While the use of AI for targeted messaging was widely acknowledged as an effective marketing tool, participants also expressed concerns about its ethical implications. In particular, several participants warned that advanced personalization strategies (if left unchecked) could contribute to the exploitation of vulnerable groups. One participant emphasized that certain populations, such as younger individuals or those with a history of gambling problems, may be more susceptible to persuasive marketing techniques. When demographic or behavioral data (e.g., cultural background, social media activity, or prior play behavior) are used to train models, there is a risk that AI systems could produce highly tailored offers that inadvertently or, perhaps, purposefully increase harm. Additionally, as one participant noted, these data points could be used to target “potential” customers using data points that are unrelated to gambling behavior:

“Target people based on what they look like, and perhaps some of the things that they’ve said on social media. Nothing to do with betting and gambling.”

This dynamic touches on what Strümke et al. (2023) refer to as “inadvertent algorithmic exploitation,” where machine learning models unintentionally leverage characteristics associated with human vulnerabilities – such as depression, young age, or gambling addiction – in pursuit of their optimization objectives (e.g., maximizing engagement or spend). While such outcomes may not be intentional, the consequences can be ethically problematic and raise important questions about responsibility, transparency, and human oversight in AI-driven marketing practices.

Importantly, AI could be used to safeguard against this. One participant proposed a mechanism involving the use of “adversarial models” layered onto marketing systems. These adversarial components would effectively act as a check, flagging or preventing offer designs that produce play patterns associated with compulsive gambling. As the participant put it, a system could be instructed to “design an offer, but don’t create patterns of play that are associated with compulsive gambling.” Thus, AI could be used to embed harm reduction principles directly into the architecture of marketing systems in a proactive rather than reactive manner.

LLMs, Agentic AI, and Human Agency

Participants expressed concern about how LLMs could be manipulated to produce harmful outputs. One participant noted that, while most LLMs are trained to reject unsafe queries (e.g., requests for dangerous instructions), users can sometimes circumvent these safeguards through indirect or iterative prompting. As one participant put it:

“You can get them [LLMs] to answer questions that they wouldn’t necessarily ordinarily answer through a series of very carefully targeted prompts and follow-ups.”

Such vulnerabilities have implications for the gambling sector, where malicious actors might seek to steer chatbot outputs to their advantage. This could be particularly problematic in scenarios where conversational agents have access to tools, APIs, and/or internal data sources for function calling (i.e., AI agents). This could be manipulated and lead to the generation of inappropriate content, leakage of confidential information, and execution of unauthorized actions (Farrar, 2025). One participant noted that this could be particularly problematic on the supplier side (e.g., machine manufacturers and game studios), where intellectual property provides a key competitive advantage. Breaches of this intellectual property may lead to legal action, as seen in a recent case between Aristocrat and Light & Wonder (Fletcher, 2024a). Additionally, another participant noted that affiliates are already experimenting with methods to manipulate LLM outputs to influence user behavior – akin to search engine optimization – as traditional search engines lose ground to LLM-based chatbots (Gartner, 2024).

Notably, even without prompt engineering, LLMs may not be capable of handling gambling-related queries adequately. A recent preprint from our research team found that two widely used foundation models were often unable to provide appropriate or accurate responses to questions related to problem gambling in sports betting contexts (Ghaharian, Soligo, et al., 2025). This brings into question the suitability of leveraging foundational LLMs for customer facing solutions. One participant drew a parallel to this kind of issue that is exhibited by generative image models, noting:

“The image generation models have been tarnished by the original data sets that they were trained on, which is porn in part. So, when you use a lot of the image generation models...they always have output, which is a little bit raunchy, for lack of a better word.”

This training data problem applies to LLMs as well, which are often trained on very large and opaque datasets. In many cases – including models developed by leading developers like OpenAI, Anthropic, and Google – the exact composition of training data is not disclosed. As a participant noted, problematic outputs may be difficult to fully “train out,” especially if these issues are embedded in the foundational pretraining phase.

Ideally, language model developers would use curated and filtered datasets for pre-training, particularly when models are intended for sensitive domains like gambling. However, given that these foundation models have already been developed, current efforts largely focus on post-training alignment. While techniques like prompt engineering and system message design offer some control, these methods are not always robust. A more promising approach may be domain-specific fine-tuning.

For example, OpenAI recently introduced HealthBench, a dataset of question–answer pairs related to health, evaluated by clinicians around the world, to help align models when they respond to medical-related questions (Arora et al., 2025). Similar approaches could be adapted to the gambling domain, as proposed in Ghaharian et al. (2025), to ensure LLMs are capable of delivering appropriate and safe responses.

Related to Agentic AI, one participant described a hypothetical but plausible future in which AI agents interact autonomously, such as a gambling agent attempting to persuade a banking agent to authorize a large transaction. While acknowledged as speculative, the example underscores the importance of governance structures that keep a “human-in-the-loop” for certain decisions.

Conversational agents were similarly viewed as carrying risks. Participants worried that, without adequate oversight, chatbots could become subtly predatory, nudging users toward “dark patterns” or exploiting moments of vulnerability. One participant commented on the need for regulation in this regard:

“AI could be used to present a potential bet or an opportunity as a friend. Now, unless there is regulation that explicitly prevents operators from doing this, you will inevitably get some bad actors going down that route”

Human Understanding and Operational Preparedness

While predictive models have long been used in gambling, the introduction of generative AI represents a significant shift in complexity and accessibility. Participants voiced concern that many industry stakeholders are not yet equipped to responsibly adopt these systems. One participant worried that supplier-side staff, in particular, could inadvertently expose IP by using generative tools to create or iterate on existing assets: for example, by feeding proprietary game mechanics into AI systems to generate new concepts. This underscores the need for clear internal policies around employee use of generative AI.

Others noted a broader lack of understanding about how generative models work. As one participant put it:

“It’s fine for us to do car research online using ChatGPT. It’s another thing to write policies that run a company right?”

This gap in understanding can lead to inappropriate trust in model outputs. Some stakeholders – employees and customers alike – may fail to question the validity of AI-generated content or may sign off on it without adequate scrutiny. Several participants advocated for AI-specific training for industry professionals and emphasized the need for internal review mechanisms, such as requiring senior staff to sign off on critical AI-generated documents or policies.

A related concern is the presence of automation bias and complexity bias. As one participant explained:

“We are victims of our own fallibility, and as far as machines are concerned, we suffer from automation bias and complexity bias. So, we don't understand how it works, and we therefore ignore it, and we automatically assume that if it’s generated by a machine it’s going to be correct.”

Finally, it was uncovered that this kind of bias could have implications in relation to player risk detection algorithms. While advanced models may offer improved predictive power, their complexity can undermine trust, particularly in contexts where explainability is essential. As one participant observed, the demand for transparency from operators and regulators often results in a preference for simpler models, even if more complex approaches might offer greater efficacy. At the same time, there is a risk that stakeholders may over-rely on model outputs, treating them as objective or definitive assessments, despite the inherent uncertainty in identifying gambling-related harm. One participant reflected:

“Can you tell me exactly how much [players] must lose, how much they must deposit? But you can’t really tell, because one metric depends on all the other metrics, right? It’s all connected to each other. So, that’s why I think we gravitate towards simple algorithms, because operators and regulators demand explainability.”

Taken together, these ethical considerations and risks raised by participants underscore the need for thoughtful governance of AI technologies in the gambling sector. These discussions also point to a potential role for regulation in ensuring responsible development and deployment, an issue explored in the next section.

Regulatory Roles and the EU AI Act

When asked about the role of regulators in overseeing and enforcing AI-related rules in the gambling industry, participants expressed a diverse set of views. A prominent theme was the EU AI Act, the world’s first comprehensive and binding piece of legislation that governs the development and deployment of AI. While some participants focused on specific provisions of the Act, others reflected more broadly on regulatory responsibilities, multi-level governance, sensitive data protection, the role of AI audits, and the preparedness of regulators themselves.

The EU AI Act and Gambling: A Prohibited Use?

Participants described how the EU AI Act provides specific details on what it prohibits including, for example, the use of harmful, deceptive, and manipulative techniques to induce distorted behavior. Harm, in this sense, may be interpreted as psychological, physical, or financial. As such, a participant explained that the use of AI in some gambling contexts could be interpreted as an unacceptable risk and thus fall under the category of “prohibited use” – the highest level of risk. The participant noted that certain AI-driven marketing techniques in gambling could potentially be classified as an “unacceptable risk” under the Act, commenting:

“Gambling operators might be deploying techniques like dark patterns...digital nudging...structuring games...making it hard for a player to remove themselves. So, they’re inducing addictive behaviors and addiction is a potential psychological harm. And they’re causing them to spend money that they don’t necessarily want. So, gambling addiction is squarely within the sights of this measure.”

Although, others did not share quite the same view. Another participant commented that any marketing activities in gambling would likely be considered a “medium risk,” but if certain use cases were considered as “health applications” more stringent requirements could be enforced.

While it is unlikely that the EU intends to ban AI use in gambling outright, participants viewed the Act as an instrument to impose greater statutory responsibility on stakeholders (operators and regulators) to mitigate potential harms. In this light, the Act could serve as a “legal lever” for reshaping how AI is used in gambling, particularly where AI interacts with players. As noted, each EU member state will designate a national regulator with authority to enforce the Act, including

oversight of “prohibited” and “high-risk” use cases. Thus, a participant warned that operators will need to carefully scrutinize their AI use cases to ensure none inadvertently meet the definition of a prohibited system:

“The gambling industry is going to need to dissect all of its use cases for AI and make it pretty clear that none of the use cases fall within the category of prohibited AI.”

This participant went further, suggesting that some stakeholders could choose to avoid using AI entirely in certain contexts in order to sidestep regulatory obligations, highlighting the need to weigh the benefits of AI against its potential risks and costs.

Existing Gambling Regulations: Already Equipped?

Not all participants agreed that new legislation like the EU AI Act would fundamentally alter regulatory expectations in gambling. One participant suggested that existing regulatory frameworks may already be sufficient to cover AI-related harms, regardless of the technology used. Referring to the UK Gambling Commission’s three licensing objectives, they remarked:

“If you look at the UK, the regulator’s objectives are to keep crime out of gambling, keep gambling fair, and to prevent harms to vulnerable people. So, you could argue they already have the mandate to police this, regardless of if you’re using AI, or if you’re calling someone up on a telephone betting account.”

This view suggests that the EU AI Act may not introduce entirely new expectations but rather amplify the need for regulators to consider AI as a novel pathway through which existing harms might manifest.

Defining AI: What Falls Under AI Regulations?

Participants also discussed the broad scope of the EU AI Act’s definition of AI. As one explained, the Act distinguishes between: *AI models* as the underlying engines or algorithms, and *AI-powered systems* as applications that rely on those models, ranging from conventional machine learning to generative AI. From the participants’ perspective, as long as a system exhibits the characteristics of AI (e.g., autonomy, learning, or adaptivity), it is subject to the Act, even if it doesn’t use cutting-edge generative techniques. This expansive definition means that many existing systems in gambling (e.g., recommendation engines or risk scoring algorithms) could fall within its purview.

Regulatory Culture and Enforcement Models

Participants contrasted different regulatory environments. Several found the UK’s approach insightful. One participant explained that the UK Gambling Commission is increasingly encouraging the use of technology, particularly in the context of consumer protection. Thus, operators are expected to demonstrate use of data related to players’ gambling behavior and how systems built on this data support player protection goals. Operators who do not adhere to this guideline are subject to financial penalties (e.g., see: Gambling Commission, 2025a). Still, a key concern remained: regulation often lags behind innovation. Currently there has been no effort on the part of a gambling regulator to address AI safety via legislative action. One participant suggested this absence may stem less from unwillingness than from a lack of confidence and knowledge among regulators:

“Regulators tend to be...civil servants, you know, people who’ve worked in certain sectors of government. Maybe in the US you have former police officers who become gambling regulators. They’re not really technologists.”

Participants also drew comparisons to other industries – particularly financial services – where regulatory oversight of AI and algorithmic models is more advanced. In that sector, models used for credit scoring or risk assessment are routinely disclosed to regulators, stress-tested for reliability, and linked to tangible incentives; for example, institutions may be permitted to hold less capital if their models meet established regulatory standards.

In some jurisdictions, participants described a multi-tiered regulatory environment where gambling operators are subject to both sector-specific and cross-sectoral rules. For example, data privacy or cybersecurity may fall under national or federal laws, while responsible gambling is overseen by industry regulators. In this context, regulators could act in a complementary manner, adapting broader regulations into tailored expectations for the gambling sector.

CONCLUSIONS AND RECOMMENDATIONS

This study highlights the expanding use of AI across the gambling industry, with four key themes (around current use cases) emerging from the focus group participants: (1) Operational Efficiency and Workforce Augmentation, (2) Customer Relationship Management, (3) Player Experience and Engagement, and (4) Compliance and Risk.

Participants emphasized both the opportunities and the risks that AI presents, particularly with regard to marketing practices, risk detection, and customer-facing conversational agents. Importantly, emerging technologies such as agentic AI, vision systems, and LLMs are expected to accelerate these developments, while also introducing new ethical and regulatory challenges.

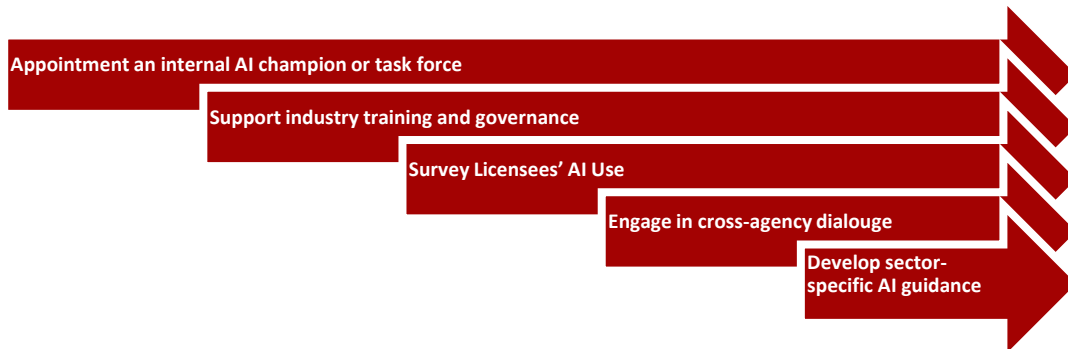
Key Findings

- **AI is already embedded in core business functions**, including back-office and customer facing use cases. While traditional machine learning and predictive analytics are well established, more novel generative AI applications are emerging.
- **Advanced personalization and agentic AI present challenges**. While they offer potential benefits for customer experience, they may simultaneously increase the risk of harm to vulnerable populations.
- **Regulatory expectations are evolving**. The EU AI Act’s risk-based framework appears to be influential in shaping global practices and could have important implications for how AI is governed in gambling contexts.
- **AI maturity varies across the sector**. While online operators may be further ahead, land-based casinos are rapidly adopting new AI capabilities. Third-party providers and more “niche” companies (e.g., Sportradar) appear to sit at the frontier of innovation – possibly due to greater agility and specialization – but also because operators may be reluctant to assume the associated risks or make the necessary investments themselves. Similarly, AI literacy and preparedness differ widely across stakeholder groups, with regulators appearing to lag behind the industry.

Recommendations

The findings of this study point to a number of practical steps that gambling regulators, particularly in the absence of broader AI regulation, can begin to take now. While the full development of AI-specific gambling regulations may take time, there are several actions that can help lay the foundation for effective oversight, promote industry accountability, and build regulatory capacity. The recommendations below are sequenced from short-term and immediately actionable, to longer-term goals that may require broader policy shifts or inter-agency collaboration (see Figure 1).

Figure 1 – Regulatory Actions Timeline



1. **Appoint an internal AI champion or task force.** Dedicate time and resources to building AI literacy among regulatory staff. This could include internal training sessions, ongoing education, or the formation of an AI-specific working group. Alternatively, regulators may consider establishing external advisory panels focused on AI, modeled after the UK Gambling Commission’s use of expert advisory groups in specialized areas (e.g., see the Digital Advisory Panel: Gambling Commission, n.d.).
2. **Support industry training and internal governance.** In the absence of specific AI regulations, regulators can encourage licensees to establish internal governance policies that cover, for example, generative AI use, employee training, and risk review protocols. Regulatory bodies might direct licensees to established frameworks like the EU AI Act or the NIST AI Risk Management Framework and promote a “best foot forward” approach that encourages proactive rather than reactive alignment.
3. **Survey Licensees’ AI Use.** Establish a structured and repeatable process to map how licensees are currently using AI systems. Such a framework has been proposed by Lozoya Martinez (2025) and is currently being piloted by our research group. An ongoing understanding of AI adoption across the sector will be essential to inform future policy decisions. Additionally, this process should be explored as a regulatory mandate to ensure transparency, and could include additional reporting requirements for other AI practices such as safeguards and testing protocols.
4. **Engage in cross-agency dialogue.** Partner with regulators from adjacent sectors to share learnings and develop harmonized principles around AI governance. This could also lead to shared technical standards and avoid duplicating efforts.
5. **Develop sector-specific AI guidance.** Over the longer term, regulators may consider issuing formal guidance or policies outlining expectations for the use of AI in gambling. This could draw from broader legal frameworks (e.g., the EU AI Act) and adapt them to gambling-specific contexts, particularly around high-risk systems like behavioral nudging or risk prediction models. For instance, regulators could require a human-in-the-loop for AI systems that produce outputs with potential consumer welfare or compliance implications.

Limitations, Future Work, and Emerging Issues

This study was exploratory in nature and based on two qualitative focus groups with subject-matter experts. As such, findings reflect perceptions and experiences rather than a comprehensive or representative industry assessment. We acknowledge the interpretive limitations of qualitative analysis; however, reflexivity was considered at every stage of data collection and analysis. We remained aware that individual belief systems influence how we interpret reality (Schiffer, 2020; Wilson et. Al, 2022), which necessitated constant reflection on how biases and preconceptions might have affected processes such as recruitment and data collection (Bourke, 2014). In this regard, the co-authored nature of this work helped to avoid the personal biases of the researchers from affecting the data. We are also aware that sometimes a hierarchical relationship between the interviewer and interviewee can occur, with the interviewer assuming a position of privilege and authority (Mason-Bish, 2019). Thus, during the focus groups, we aimed to establish equal dynamics and foster a collaborative atmosphere.

Future research could replicate this methodology with a larger and more diverse sample. Alternatively, a survey-based design may be appropriate for gathering broader insights in areas that require less contextual depth. Given our finding that AI maturity varies across the industry (particularly within regulatory bodies) it may be worthwhile for future academic work to assess AI literacy across stakeholder groups. This could help identify where training or education is needed, as well as inform the development of appropriate educational materials.

While participants acknowledged both the benefits and potential harms of AI applications for customers (e.g., enhanced personalization, privacy risks, etc.), future research should incorporate the perspectives of customers themselves. Understanding how end-users perceive AI in gambling, including those with lived experience of gambling harms, could yield valuable insights. Individuals with lived experience have been shown to contribute meaningfully to other areas of gambling research (Jenkins et al., 2024).

A deeper dive into the technical limitations of AI-based systems may also be warranted. While focus group participants highlighted various important considerations, such as ethical concerns around targeted marketing and the limitations of language model training data, other technical concerns lacked in-depth discussion. For example, false positives or misclassifications could be particularly problematic in marketing or player risk assessments, potentially resulting in wrongful advertising to players (e.g., those who have self-excluded) or incorrect risk identification. Similarly, model drift (where a model's performance degrades over time) and algorithmic bias (where algorithms unfairly discriminate against certain populations) are other important avenues for future work. Prior work in the gambling studies field has begun to emerge in these areas (e.g., see: Murch et al., 2024, 2025; Percy et al., 2020), but more is certainly warranted given the rapid growth in this field.

Additionally, there were two emerging areas that we feel require further attention from a multi-stakeholder standpoint.

Governance Gaps in the AI Supply Chain

Although the EU AI Act is widely considered the most robust AI governance framework to date, gaps may emerge in its application to the gambling sector. Operators may not fall under the jurisdiction of the Act or may choose not to adhere to its provisions, due to, for example, oversight, ambiguity, or operating outside the EU. Furthermore, many operators procure AI systems from third-party vendors, some of whom may be based in jurisdictions with less stringent or non-existent AI regulation. This creates a fragmented governance landscape, particularly in the absence of gambling-specific AI guidance. As a result, AI accountability may vary significantly across operators and suppliers, increasing the risk of inconsistent safeguards, poor documentation, and transparency.

A Note on Foundation Models

As identified in our findings, many emerging AI applications in gambling (e.g., customer-facing tools like chatbots) are built on large foundation models (e.g., from OpenAI, Google, Anthropic). These models are trained on proprietary datasets that are not publicly disclosed, raising transparency and reliability concerns, particularly in sensitive domains such as gambling.

Our research, along with evidence from other sectors, shows that foundation LLMs can produce inappropriate, misleading, false (i.e., hallucinations), or harmful outputs, and often fail to abstain from responding to sensitive queries. Despite these risks, there are currently no regulatory requirements for gambling operators to disclose their use of such systems or to implement safeguards. This raises key questions:

- Is a foundation model being used in a customer-facing feature (e.g., chatbot)?
- Has it been fine-tuned, and if so, using what data?
- Have any safeguards (e.g., red teaming, alignment, or output filtering) been implemented?
- Can the system reliably abstain from answering sensitive or off-topic questions?

For instance, if a chatbot is deployed to handle account management tasks, has it been tested to ensure it doesn't provide advice on gambling strategies or financial decisions? Similarly, if a chatbot is provided as a "betting assistant," has it been evaluated for risks like information leakage, manipulation, or persuasive nudging (e.g., encouraging harmful play)? At present, there are no established benchmarks or transparency requirements governing these implementations. This lack of oversight highlights the critical need for regulatory approvals and clear guidelines to protect consumers.

STUDY 2 – BRIDGE SYSTEMATIC REVIEW

The increased digitization of gambling over the past two decades has enabled the collection of increasingly granular behavioral data on players. Online gambling platforms and casino management systems in land-based environments now routinely capture detailed information about player activity, for example, time spent gambling, transaction frequency, and the use of responsible gambling tools. These data have provided opportunities to identify early warning signs of gambling-related harm through data science techniques, including machine learning and predictive modeling.

Now, there is a burgeoning field of study focused on this player risk detection problem, with engagement from both academe and industry. Regulatory bodies are also increasingly mandating the use of such data-driven approaches. For example, the UK Gambling Commission introduced new requirements in September 2022 obligating operators to monitor a specific set of behavioral indicators and implement automated processes for strong indicators of harm (Gambling Commission, 2022).

However, an ongoing challenge is providing guidance and determining which indicators are most effective for modeling risk. To address this, standardization efforts have begun to emerge. One such initiative is the development of a European standard on “markers of harm” for online gambling by the European Committee for Standardization (CEN, French: Comité Européen de Normalisation). This initiative aims to define a set of behavioral indicators that can be used consistently across jurisdictions to identify problematic gambling behavior more quickly and accurately. A presentation at ICE London in February 2024 revealed that CEN’s technical committee is considering nine key markers of harm: losses, changes in the use of responsible gambling tools, gambling product preferences, time spent gambling, customer-initiated contact, canceled withdrawals, depositing behavior, speed of play, and volume of stakes. However, details about the methodology and progress of this remains limited.

A similar effort was led by the UK’s Senet Group, which convened a series of meetings between five major gambling operators (McAuliffe et al., 2022). The group agreed on a minimum of nine markers of harm, including: spend from norm, frequency of play, late-night play, deposit frequency, failed deposits, withdrawal reversals, multiple payment methods, and credit cards.

Additionally, both the UK Gambling Commission and Dutch regulator (Kansspelautoriteit, Ksa) have published lists of indicators that they recommend should be used to monitor players and detect risk (Gambling Commission, 2022; Kansspelautoriteit, 2025). The UK Gambling Commission’s list, includes: customer spend, patterns of spend, time spent gambling, gambling behavior indicators, customer-led contact, use of gambling management tools, and account indicators. However, the development process behind this list is unclear.

In contrast, the Ksa provided greater transparency in their methodology. Their report references a literature review by Delfabbro et al.(2023), and describes a consultation process involving workshops led by Focal Research Consultants. The Ksa categorizes its indicators into five domains: intensity, loss of control, increase in gambling, operator behavior, and features of the games.

Despite these promising developments, there is still a need for greater clarity on which indicators are most effective. While grounding decisions in available evidence is essential, drawing strong inferences from existing research remains challenging. As noted in the Ksa report, “some indicators have been studied extensively, while others have only been studied a few times,” and “even when indicators were studied multiple times, they were often operationalized in different ways and that makes comparisons difficult.”

This study sought to address these challenges by contributing empirical evidence and greater methodological consistency to the evolving discourse on behavioral risk indicators.

OBJECTIVES

The objective of this study was to systematically collect and evaluate existing evidence on behavioral risk indicators used to identify at-risk gamblers based on objective tracking data. Importantly, this is not the first review conducted in relation to this topic; at least five reviews have been published in the past six years. Thus, to justify our approach and clarify our contribution, we briefly summarize these prior efforts.

Chagas and Gomes (2017) conducted an early critical review of 55 studies using behavioral tracking data to understand online gambling behavior. While this review was broad in scope and seminal in identifying early applications of behavioral data, it did not follow a standardized literature review framework such as PRISMA⁵. At the time, the review provided a valuable snapshot of the field and helped shape subsequent research agendas. However, the pace of technological advancement and methodological innovation in this domain has accelerated significantly since then.

Deng et al. (2019) conducted a narrative review examining the application of data science techniques to online gambling behavioral tracking data, including machine learning for early detection of high-risk gamblers. While narrative reviews are useful for synthesizing findings and proposing future research directions, they are not required to follow structured methodologies for search, inclusion, or synthesis, which introduces potential bias through omission of relevant literature (Grant & Booth, 2009).

Mak et al. (2019) conducted a systematic review of machine learning applications in addiction research more broadly. While methodologically rigorous, the review included only two gambling-specific studies and was not tailored to the gambling context.

More targeted reviews have emerged in recent years. Ghaharian et al. (2022) conducted a scoping review guided by the PRISMA-ScR framework, focusing on data science applications in the context of responsible gambling. The review identified 37 studies spanning a wide range of methodological approaches and data types. While intentionally broad in scope, the review provided a valuable mapping of current applications and offered a detailed assessment of methodological components.

A year later, Delfabbro et al. (2023) published a review focused specifically on behavioral tracking data collected by online gambling operators. Their primary aim was to summarize trends in the literature and identify areas for future research. While they provided some methodological detail, the review did not appear to follow a standardized framework. Their key inclusion criterion was that studies use objective online behavioral data. Of the 58 studies included, 45 (78%) focused on individual player risk, while the rest examined product-level factors. Although the review provides useful insight into indicators for player risk detection, the broad inclusion criterion (any use of online behavioral data) meant that the included studies varied widely in their aims, ranging from identifying predictors of account closures and other proxies of harm to evaluating responsible gambling tools such as messaging and limit setting.

Most recently, Marionneau et al. (2025) conducted a PRISMA-ScR-based scoping review of 31 academic studies, with a particular focus on the methodological stages involved in developing player risk assessment models. Their aim was to inform the development of a regulator-led risk prediction model, and to support this goal they focused on evaluating studies based on three key stages: (1) the selection of training data; (2) decisions on model estimation; and (3) the assessment and interpretation of prediction results. The review made a valuable contribution by offering a structured and detailed methodological evaluation of the current evidence base.

However, while Marionneau et al. noted that they extracted information on predictors used in these models, their summary of the predictor sets was presented at a relatively high level. For example, predictors were broadly categorized

⁵ Literature review frameworks, such as the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA), were developed to improve the transparency, consistency, and methodological rigor of evidence syntheses. Originally introduced in health sciences, PRISMA has since been widely adopted across disciplines, including psychology, public health, and gambling studies. Reviews that follow PRISMA use predefined eligibility criteria, structured search strategies, and standardized reporting protocols to reduce bias and improve replicability.

as “gambling behavioral variables” or “demographics,” without detailed breakdowns of specific indicators. Their accompanying commentary noted that behavioral indicators typically included variables related to time and money spent, gambling frequency, transactions, or use of gambling management tools. Demographic characteristics such as age, gender, and country of residence were also commonly reported. As with Ghaharian et al., Marionneau et al. observed that the number and nature of predictors were often unclear or inconsistently reported, ranging from fewer than ten to over one hundred across studies.

This high-level treatment of predictor sets was also observed in the Delfabbro et al. and Ghaharian et al. reviews. However, both these reviews made a more detailed attempt to name individual variables in their commentary and provided tables listing specific indicators used across studies. However, it is difficult to draw firm conclusions about indicators from these efforts, as the primary objectives of both reviews were not specifically focused on evaluating studies focused risk identification or assessing the predictive validity of individual indicators – Ghaharian et al. focused on mapping the breadth of data science applications for responsible gambling generally, and Delfabbro et al. focused on mapping the evidence that had leveraged online behavioral tracking data.

Aims of this Review

Given the coverage of these current reviews, this study aimed to provide a more detailed synthesis that targets specific behavioral indicators being used, and the strength of evidence supporting each. As highlighted by most of the reviews here: indicators need to be more thoroughly investigated and methodologies need to be better assessed and compared. As new regulatory and industry efforts aim to define standardized predictors for risk detection, a clearer understanding of the current indicator landscape and the quality of supporting evidence becomes increasingly important. Our review aims to fill this gap by attempting to generate a user-friendly “catalogue” of behavioral risk indicators to help audiences understand their evidentiary support: The **Behavioral Risk Indicators Database of Gambling Evidence (BRIDGE)**.

We believe BRIDGE complements and builds upon the foundations of prior scoping and narrative reviews by adopting a more targeted and systematic approach, where we prioritize a focus on behavioral risk indicators derived from objective player tracking data. Our specific pre-registered research questions were as follows:

- RQ1: What methods are used to identify at-risk individuals with behavioral tracking data?
- RQ2: How do the methods perform?
- RQ3: What behavioral indicators are used within these methods?
- RQ4: What is the level of support and the quality of evidence for these behavioral indicators?

Additionally, we aimed to lay the foundation for a “living review,” where this evidence base can be regularly updated – negating the need for multiple fragmented efforts – and offering a collaborative resource for academic, regulatory, and industry stakeholders.

METHODS

This review was pre-registered in advance of data collection and analysis, and conducted in accordance with the PRISMA guidelines. The full pre-registration document details all stages of the review’s methodology (available at: <https://osf.io/rj92s>). Here, we provide a more concise summary of the methods used, along with supplemental rationale for any deviations or decisions made during the development of the review methodology and/or during the execution of the review process.

As stated in our pre-registration, we adapted the PICO framework to guide the development of the review’s methods. Specifically, we defined our Population as gamblers (P), Intervention as methods and indicators of behavioral risk identification (I), and Outcome as gambling-related harm (O). We also included a data component to ensure the review captured studies using objective tracking data (essential for generalizing to practical applications), and excluded the Comparison element, as it was not relevant to our research questions.

Eligibility Criteria

To be included in the review, studies had to meet the criteria detailed in Table 3.

Table 3 – Eligibility Criteria

Criteria	Description
Language	Published in English.
Publication type	Published in a journal, conference proceedings, technical reports, grey literature, and others.
Data	Must leverage some form of objective tracking data to support player risk identification. This may include, but is not limited to, data sources such as bet-level information tracked by gambling operators (online or land-based), financial transactions recorded by, for example, third-party service providers, banks, and other financial institutions, or text records from customer interactions. Studies that use exclusively self-reported data to construct indicators to predict risk will not be included in the review.
Objective	One of the objectives (stated or inferred) of included studies must be the creation of a data science model for the identification and/or prediction of players at a potential risk of gambling-related harm, and/or the understanding of markers/indicators of gambling-related harm.

We deliberately took an inclusive approach to defining objective behavioral tracking data, rather than limiting inclusion to gambling operator datasets alone. This decision reflects the evolving nature of the data ecosystem available to support player risk detection. For example, financial transaction data was recently mandated for players' financial risk assessments by the UK Gambling Commission as of February 2025. Similarly, advances in natural language processing (NLP) and large language models (LLMs) enable the analysis of text, and studies are beginning to emerge leveraging this source of data (Smith et al., 2024). Moreover, advances in data collection in land-based environments have closed the gap in terms of leveraging machine learning and predictive modeling for behavioral data analysis⁶.

Given the wide range of ways that gambling-related harm has been defined across the literature (as evidenced in prior reviews), we clarified this eligibility criterion by specifying that included studies must have an objective (preferably explicitly stated in the manuscript or report) to develop a model for predicting gambling-related risk or to identify and understand behavioral indicators associated with harm.

Search Strategy

Three search components connected with an 'AND' statement were used to carry out the literature search across two databases: Scopus and Web of Science. The completed search term, with appropriate syntax included, was as follows:

(gambling OR wagering OR "sports betting") AND (data OR "player tracking" OR online OR internet) AND (predict OR "Artificial intelligence" OR algorithm* OR "Machine learning" OR identif* OR detect* OR markers OR cluster* OR self-exclu* OR "Neural network*")*.

Additionally, we restricted our database searches to articles published from 2022 onward, as pre-existing literature reviews on this topic had already comprehensively collected studies published up to at least 2021. To ensure continuity and avoid duplication, we manually scanned the final included studies of two recent reviews – Delfabbro et al. (2023) and Ghaharian et al. (2022) – to identify any relevant earlier studies. We also performed an adapted search on Google Scholar.

Screening and Selection

A team of three reviewers conducted the screening process for article inclusion. All articles identified through the search strategy were imported into Covidence. Duplicate records were automatically flagged using Covidence and resolved manually by the research team as needed.

Each reviewer independently screened the titles and abstracts of all retrieved records. Articles were categorized as 'include', 'exclude', or 'TBD' (to be determined). A citation was marked as include if its title and abstract indicated that it met the eligibility criteria. A TBD designation was used when abstracts were missing or the content was too vague to allow a clear decision. Records were marked as exclude if they clearly failed to meet one or more eligibility criteria or were not relevant to the review's aims.

⁶ Commercial technology providers enable the collection of granular bet-level information for each player (e.g., see www.axes.ai and www.acretechnology.com). Additionally, radio frequency identification (RFID) technology and vision-based systems can facilitate granular tracking of players' betting activity on table games (e.g., see www.wdtablesyste.ms.com and www.cogniac.ai).

After the initial title and abstract screening, all TBD articles were reviewed and resolved by consensus. The research team then conducted full-text reviews of all articles marked as include or TBD-approved, ensuring that each met the inclusion criteria and was relevant to the research questions. The final set of studies included in the review was based on this full-text screening process as well as articles identified from prior reviews that met the eligibility criteria.

Data Charting and Synthesis

In our pre-registration, we indicated that data extraction and quality assessment of include studies would be guided by two established tools: the CHARMS (**C**hecklist for critical **A**ppraisal and data extraction for systematic **R**reviews of prediction **M**odelling **S**tudies) and TRIPOD+AI (**T**ransparent **R**eporting of a multivariable prediction model for **I**ndividual **P**rognosis **O**r **D**iagnosis – **AI** extension) checklists. These tools were developed to support the evaluation and reporting of prediction modeling studies, specifically in clinical and medical domains. Both focus on assessing the completeness and transparency of reporting in studies using AI and machine learning.

However, we encountered several limitations when applying these tools in their original form. Chief among our concerns was that both checklists are designed as binary frameworks – assessing whether specific items are reported – rather than offering a mechanism for “grading” the quality or relevance of studies. Additionally, several checklist items were either inapplicable or poorly aligned with studies in the gambling and behavioral risk detection literature.

As a result, we used CHARMS and TRIPOD-AI as initial guides but developed a customized data extraction form. The final data charting template incorporated selected elements from both checklists while introducing structured fields specific to player risk detection research.

Our final extraction form included 25 items:

- **Study and publication details:** Article title, author(s), publication year, publication journal, publication identifier (DOI/PMID)
- **Sample and data characteristics:** Data source, gambling type, sample specification, sample size, data collection period (age of data), time horizon, and geographic location
- **Study design and modeling:** Study objective, data science category, model/analysis method, outcome, outcome class, outcome type
- **Indicators:** Names of predictors, Number of predictors, indicator selection (prior to modeling), indicator selection (during modeling), algorithm/model selection
- **Model evaluation:** Metric coverage and quality (each scored on a 3-point scale – weak, moderate, or strong)
- **Transparency:** Open science practices (e.g., availability of code or data)

To facilitate usability and future analysis, two members of the research team (KG and JB) collaboratively defined possible values for as many data entry fields as possible. While not feasible for every variable, we aimed to keep field values simple, consistent, and intuitive. This approach served two purposes: (1) it reduced the cognitive load on the data extraction exercise, and (2) it enabled consistent entries across team members, making downstream synthesis and comparison more efficient. To further promote accuracy and mitigate fatigue bias during the data extraction phase, five researchers from IGI independently extracted data from subsets of the included studies using the structured form. After this initial extraction phase, all entries were cross-checked by the principal investigator (KG) for accuracy and completeness. Researchers were also asked to provide rationale for certain fields, in particular, justification for decisions related to each studies’ objectives (i.e., descriptive vs. predictive) and their metric coverage and quality scores.

To standardize indicator classification across studies, we implemented a two-level categorization system. The research team extracted all reported predictors, then one author (KG) reviewed and harmonized terminology. Because the same indicators were often labeled inconsistently across studies (e.g., number of bets, frequency, wager count) and/or varied in terms of computation or aggregation (e.g., median, means, totals), we grouped them into lower-level indicator categories (n = 65). These were further collapsed into five higher-level behavioral dimensions (play, engagement, payment, RG tool use, profile information). Descriptions of higher-level categories are provided in Table 4 and the list of lower-level indicators in Table A1.

Table 4 – High-level Indicator Categories

Indicator	Description
Play	Indicators related to betting/wagering behavior, such as bet frequency and size.
Profile information	Static account or demographic attributes, such as age, gender, or registration date.
Engagement	Indicators of when, how often, and how broadly a player interacts with games or platforms.
RG tool use	The use of responsible gambling tools, such as deposit limits, time-outs, or self-exclusion.
Payment	Financial transactions related to the gambling account, e.g., deposits, withdrawals, payment methods.

To enhance the accessibility and utility of this review for stakeholders, we implemented a simple scoring system to summarize key methodological features and reporting practices across studies. While 25 fields were extracted, scoring focused on a targeted subset (n = 9) deemed most relevant for assessing the evidentiary strength of player risk indicators (Table 5).

Table 5 – BRIDGE Scoring Rubric

Criterion	Scoring Approach
Study objective	Descriptive studies = 1; Predictive studies = 2 + scoring on all fields below
Outcome class	Validated screener = 4, Proxy of harm = 3, Group of thresholds = 2, Single behavior = 1
Indicator selection (prior to modeling)	Not stated/unclear/subjective = 0, Otherwise = 1
Indicator selection (during modeling)	Not stated/unclear/subjective = 0, Otherwise = 1
Algorithm/model selection method	Not stated/unclear/subjective = 0, Otherwise = 1
Metric coverage	Weak = 0, Moderate = 1, Strong = 2
Metric quality	Weak = 0, Moderate = 1, Strong = 2
Open science	0-1 practices = 0, 2-3 practices = 1, 4+ practices = 2
Peer-review	No = 0, Yes = 1

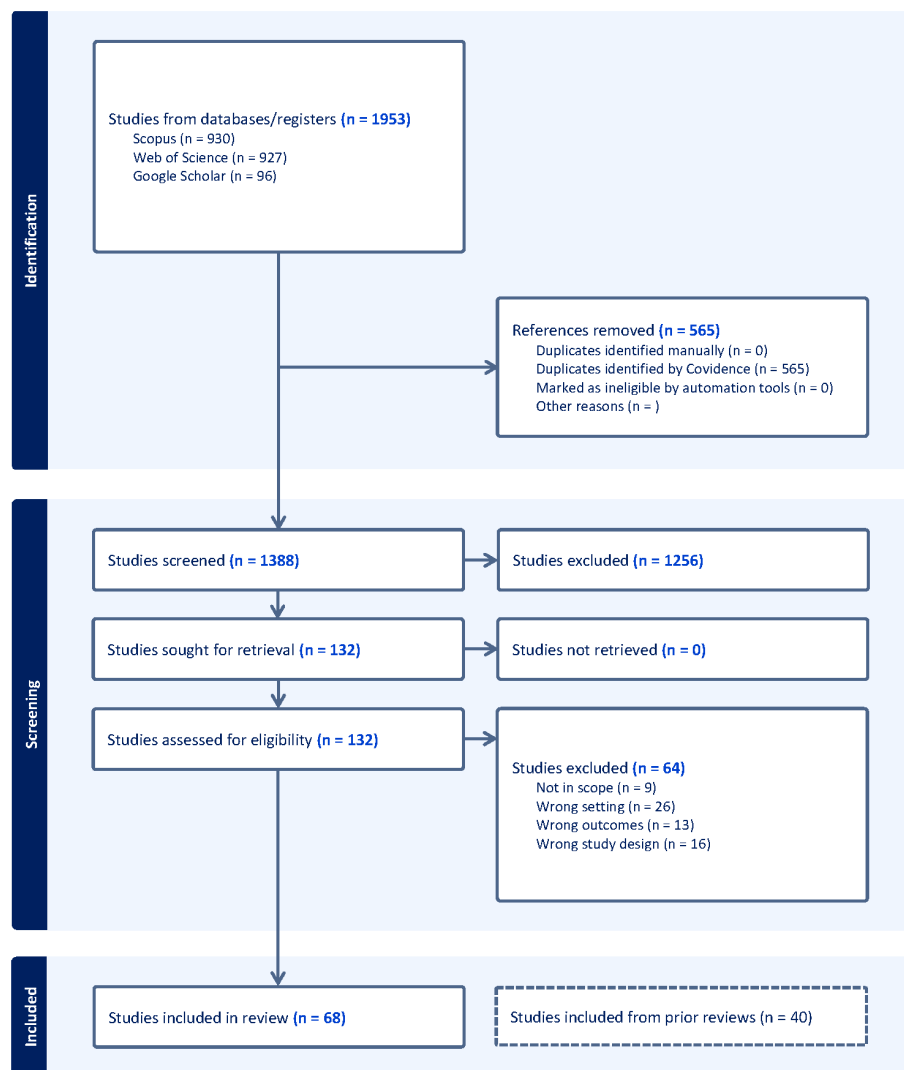
We assigned “descriptive” studies a baseline score of 1 because their primary aim is often to explore or characterize data rather than build or test models specifically for risk prediction. While these studies are valuable for identifying candidate indicators, the absence of a defined outcome variable linked to player risk inherently limits the strength of evidence they provide. In contrast, studies with a “predictive” objective were scored higher and assessed across the remaining eight domains of the rubric, as they typically included an outcome variable directly associated with player risk. We’d like to note, this scoring framework is not intended to function as a formal quality appraisal tool. Rather, it serves as a practical and intuitive mechanism to help stakeholders quickly evaluate included studies⁷.

RESULTS

A total of 68 studies were included in the final review. The number of records identified, screened, assessed for eligibility, and ultimately included are detailed in the PRISMA flow diagram (Figure 2).

⁷ While formal risk of bias tools exist, these were primarily developed for clinical trials and are thus not well-suited for this specific context. Tools such as PROBAST have emerged for evaluating prediction models but, again, are focused on clinical applications. Considering these limitations, we propose this custom scoring system tailored to the specific objectives of this review. We acknowledge that this approach is inherently subjective and was shaped by the consensus of our review team. Nonetheless, we did use existing tools to inform its design and view it as an important first step toward greater consistency in evaluating this evolving evidence base. Given our aim to maintain this review as a living resource, we look forward to inviting feedback and engagement from the broader research community to iteratively refine and validate this framework over time.

Figure 2 – PRISMA Flow Diagram



Descriptive and predictive studies were summarized separately to reflect their differing objectives and methodological characteristics. Completed raw data extraction forms, including metadata for each study, for the descriptive studies (n = 25) and the predictive studies (n = 43) are available on [Google Drive](#) in the “BRIDGE Data Extraction” file.

Descriptive Studies

Among the studies classified as descriptive, 12 employed some form of cluster analysis, an unsupervised machine learning technique. The remaining 13 studies used a variety of analytical approaches, which we grouped into three categories: concentration analysis (n = 6), statistical analysis (n = 3), and regression analysis (n = 4). The overarching goal of these studies was to identify distinct player subgroups or behavioral patterns using variables engineered from objective tracking data.

Sample sizes ranged from 398 to 195,318 players, with observation periods spanning 1 to 70 months. Of the 25 studies, 19 used data from players located in European countries. The gambling product verticals analyzed included casino games, sports betting, poker, lottery, daily fantasy sports (DFS), horse racing, and electronic gaming machines (EGMs). The distribution of behavioral indicators across the five high-level categories is presented in Figure 3. The top 20 most frequently used indicators (according to the low-level categorization scheme) are presented in Table 6⁸.

⁸ Raw count data for each indicator is available on [Google Drive](#) in the “BRIDGE Score Data” file.

Figure 3 – Distribution of Indicators for Descriptive Studies Across High-level Categories

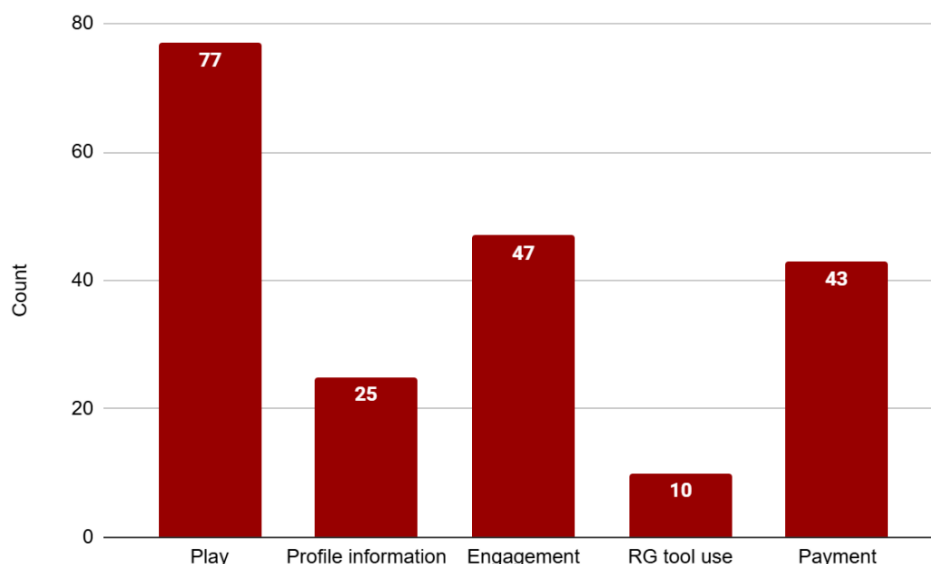


Table 6 – Top 20 indicators Across Descriptive Studies

Indicator	High-level category	Appearances
Bet amount	Play	18
Active days number	Engagement	17
Bet number	Play	10
Net loss	Play	9
Bet intensity	Play	9
Duration	Engagement	9
Age	Profile information	8
Gender	Profile information	8
Breadth of involvement (e.g., games)	Engagement	7
Loss chasing	Play	7
Deposit number	Payment	6
Country or location of player	Profile information	6
Time of day	Engagement	6
Deposit declines	Payment	6
Losses	Play	6
Deposit amount	Payment	4
Wins amount	Play	4
Set limit	RG tool use	4
Deposit intensity	Payment	4
Deposit variability	Payment	4

Cluster Analysis

Studies employing cluster analysis (n = 12) – an unsupervised machine learning technique – aimed to identify subgroups of gamblers based on a combination of behavioral and, in some cases, demographic variables. The number of variables used in these analyses ranged from 3 to 14, with 7 of the 11 studies explicitly stating that variable selection was informed by prior literature. Most studies utilized the *k*-means clustering algorithm, while others applied latent class analysis (Perrot et al., 2018) or hidden Markov models (Bowman et al., year). One study also benchmarked multiple clustering algorithms to identify the most suitable method, offering a more objective approach to model selection (Ghaharian, et al., 2023).

Cluster analysis is a powerful exploratory technique, particularly suited to large behavioral datasets, as it groups individuals based on shared characteristics. However, a major limitation in the included studies was the lack of external

validation. Most studies did not assess the resulting clusters against a validated outcome variable (e.g., self-reported harm or behavioral proxy).

For example, Ghaharian et al. (2023) used payment transaction data from 2,286 gamblers and identified three potentially “at-risk” groups. However, group interpretation relied solely on the relative differences in cluster variables within the sample, rather than comparison to an external outcome. Similarly, Wiley et al. (2020) clustered 11,130 DFS players and identified three distinct behavioral groups, but without validation against a known risk indicator. Despite these limitations, such exploratory studies offer valuable foundational insights, particularly when working with novel datasets (as in the cases of Ghaharian et al. and Wiley et al.) where outcome labels are unavailable.

A few studies did attempt some form of objective validation of clusters. For example, Dragicevic et al. (2011) applied the same algorithm and parameters as a prior study by Braverman and Shaffer (2012), which had access to an external outcome variable: account closure. Although Dragicevic et al. did not include an outcome variable of their own, the methodological alignment enabled a form of indirect validation through comparison.

Similarly, Ghaharian et al. (2024) replicated the clustering parameters and methods from their earlier study (Ghaharian et al., 2023) using a different dataset from another gambling operator. They also applied the prior cluster centroids to the new dataset to assign group membership, offering insight into the generalizability of the clustering solution. While these approaches support methodological consistency and transferability, they do not provide direct evidence that the resulting clusters correspond to “at-risk” or problem gamblers in the absence of an external outcome measure.

One study employed CHAID (Chi-square Automatic Interaction Detection), a decision tree algorithm used for segmentation based on a continuous dependent variable—in this case, the total amount of money spent (Chagas et al., 2022). The primary aim was to identify distinct player segments associated with higher spending and to examine the influence of product characteristics (e.g., lotto vs. scratch cards). While CHAID differs from cluster analysis (an unsupervised learning method) because it requires a predefined outcome variable, we include it in this category due to its shared objective of identifying meaningful player segments.

It is also worth noting that most of the literature using cluster analysis is cross-sectional or based on aggregated data, limiting its ability to capture behavioral change over time. An exception is Perrot et al. (2018), who used multilevel latent class analysis to track player behavior longitudinally, revealing monthly variations such as initial intense gambling followed by stabilization. Similarly, Bowman et al. applied hidden Markov models to identify dynamic “behavioral states” and transitions (e.g., moving from moderate winning to severe losing), offering a more nuanced view of behavioral progression.

Concentration Analysis

Studies in this category ($n = 6$) aimed to describe overall gambling activity across full populations of users, typically using transactional data to identify subgroups of “highly involved” players. These subgroups were characterized by metrics such as high frequency of play, large bet volumes, or large losses, and consistently represented a small proportion of the total sample.

Rather than using clustering techniques, these studies relied on descriptive analyses to show how a minority of users account for a disproportionately large share of gambling activity (e.g., percentile plots). This approach is useful for understanding patterns of gambling involvement and industry reliance on a small subset of users. However, as with cluster analysis, these studies generally lacked outcome measures to validate whether the highly involved groups were experiencing gambling-related harm. High involvement alone cannot be equated with risk, limiting the ability to draw conclusions about player vulnerability or harm.

Statistical Analysis

A smaller group of studies ($n = 3$) employed group comparison methods to assess differences in gambling behavior between predefined groups. Unlike cluster or concentration approaches, these studies incorporated outcome measures to identify patterns associated with higher risk. However, as they did not develop or test predictive models, they were not included in the predictive studies category.

LaBrie and Shaffer (2010) analyzed betting data from over 47,000 sports bettors, comparing those who closed their accounts due to gambling-related problems with those who closed for unrelated reasons. Their analysis revealed a subgroup of individuals with gambling-related problems who made larger bets, bet more frequently, and were more likely to exhibit intense betting soon after enrollment.

Two articles by Delfabbro et al. (2023; 2024) took a different approach (from much of the literature contained in this report), focusing instead on which behavioral markers of harm might be useful to identify higher-risk gambling *products* rather than gambling participants.

Delfabbro et al. (2023) assessed whether behavioral markers could help differentiate the relative riskiness of online gambling products. Their analysis supported existing hypotheses that products with short event frequencies, continuous betting opportunities, and high availability (i.e., online slots, in-play betting, and micro-betting) were more strongly associated with harm markers. For example, bonus page visits and gambling at unusual times were most strongly linked to slots, live roulette, and other live table games, and in-session top-ups (i.e., loss chasing), were also prominent among slots, in-play combination sports bets, and live versions of blackjack and roulette. Conversely, they showed that changes to responsible gambling settings showed limited value in distinguishing risk between products.

In a follow up study, Delfabbro et al. (2024) further investigated product-risk associations using a larger, international sample that included self-reported PGSI data. People classified as having gambling problems were found to be more likely to gamble on a wider range of products and to gamble more frequently, particularly on casino games.

Regression Analysis

The included studies utilizing regression ($n = 4$) were classified as descriptive, as they lacked an outcome variable that was directly tied to player risk. For example, Edson et al. (2024) examined loss chasing as a defining marker and potential risk factor of problem gambling behavior, using a binary high/low approach for loss chasing dimensions. This study found that the 'high' groups consisted of diverse members, and only one variable (bet size) was positively predictive of mounting losses, but that none of the loss chasing groups were found to be statistically significant. Whiteford et al. (2022) employed regression to investigate the relationship between in-play betting behaviors (such as bet frequency, duration of play, and average stake); this study found the degree of involvement moderated the relationship between number of in-play bets and the remaining betting measures.

Predictive Studies

Among the studies classified as predictive ($n = 43$), the majority employed supervised machine learning techniques to classify players based on a harm-related outcome. A smaller subset used unsupervised machine learning ($n = 5$) or statistical methods such as regression ($n = 3$). The overarching goal of these studies was to predict gambling-related harm using behavioral indicators derived from objective player tracking data.

Sample sizes ranged from 85 to 916,312 players, with observation periods spanning 1 month to 10 years. Of the 44 studies, 7 used data from players located outside of Europe. The gambling product verticals analyzed included casino games, sports betting, poker, lottery, daily fantasy sports (DFS), and electronic gaming machines (EGMs).

A range of outcome measures were used to define harm and serve as a target for models: account closure ($n = 9$), self-exclusion ($n = 15$), operator- or system-defined risk scores ($n = 10$), and validated screeners such as the PGSI ($n = 9$) and BBGS ($n = 2$). These outcomes fall into three general categories: validated screeners ($n = 11$), proxy measures of harm ($n = 23$), and operator-defined thresholds ($n = 10$).

The large majority of studies defined the outcome variable binarily. For example, when PGSI was used researchers commonly applied a cut-off score (typically 5+ or 8+) to classify individuals as either experiencing harm or not. Similarly, when harm proxies such as account closure or voluntary self-exclusion were used, models were developed to label users as either exhibiting the behavior or not.

The number of predictor variables varied considerably across studies, with one study including more than 150 behavioral indicators. The most common method for selecting candidate indicators prior to modeling was referencing prior literature ($n = 20$). However, in 15 studies, the selection process was either unclear, not stated, or appeared arbitrary.

During the modeling stage, most studies (n = 26) used a full model approach (i.e., retaining all candidate variables without elimination). Fourteen studies applied an objective method for variable selection, while 3 did not clearly describe their approach. One study used a subjective method for determining which variables to include.

The distribution of behavioral indicators across the five high-level categories is presented in Figure 4. The top 20 most frequently used indicators (according the low-level categorization scheme) are presented in Table 7⁹.

Figure 4 – Distribution of Indicators for Predictive Studies Across High-level Categories

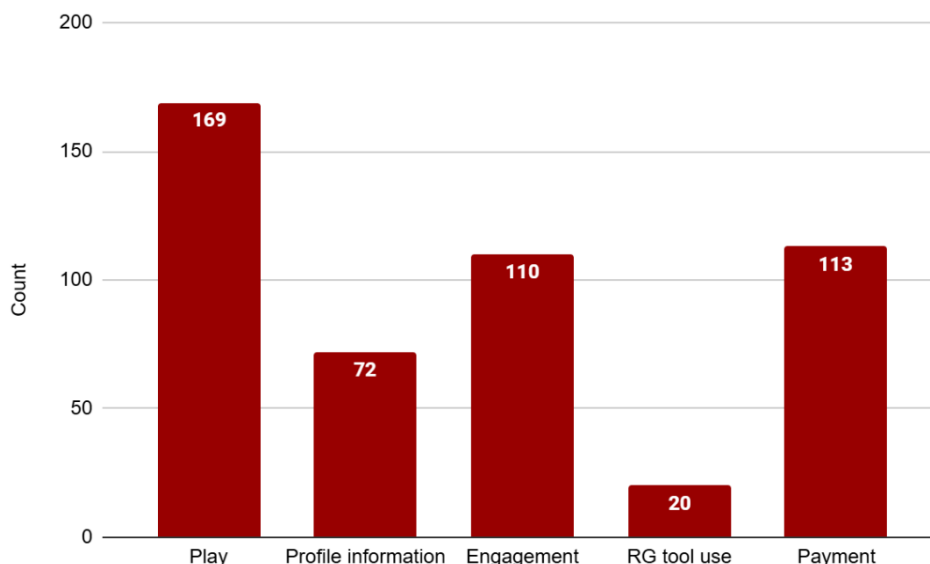


Table 7 – Top 20 indicators Across Predictive Studies

Indicator	High-level category	Appearances
Bet amount	Play	34
Net loss	Play	26
Active days number	Engagement	25
Bet number	Play	24
Age	Profile information	23
Gender	Profile information	21
Breadth of involvement	Engagement	20
Deposit amount	Payment	18
Bet variability	Play	17
Session length	Engagement	15
Deposit number	Payment	14
Bet intensity	Play	13
Wins amount	Play	12
Withdrawal amount	Payment	11
Withdrawal number	Payment	11
Bet trajectory	Play	10
Country or location	Profile information	10
Set limit	RG tool use	10
Time of day	Engagement	10
Session number	Engagement	9

⁹ Raw count data for each indicator is available on [Google Drive](#) in the “BRIDGE Score Data” file.

Evaluation Metrics – Coverage and Quality

For each predictive study, we recorded how well the authors reported model performance using two criteria: metric coverage (i.e., the number of evaluation metrics reported) and metric quality (i.e., the actual performance of the model, such as accuracy or area under the curve [AUC]).

In terms of metric quality, we classified 14 studies as weak, 9 as moderate, and 20 as strong. A weak performance was defined, for example, as an AUC only slightly better than chance (i.e., 0.50–0.65), while a strong quality rating reflected more robust model performance (e.g., AUC > 0.75).

For metric coverage, 13 studies were rated as weak (e.g., reporting only 1–2 metrics when multiple are standard practice), 4 as moderate, and 26 as strong (e.g., a supervised ML model reporting accuracy, sensitivity, specificity, F1 score, and AUC).

Table 8 – Contingency Table

Metric Coverage → Metric Quality ↓	Weak	Moderate	Strong	Total
Weak	8	2	4	14
Moderate	2	1	6	9
Strong	3	1	16	20
Total	13	4	26	44

Overall Level of Support and Quality of Evidence

To summarize and compare the importance of different behavioral indicators across the literature (i.e., across both descriptive and predictive studies), we developed an intuitive 0–10 scoring system – the *BRIDGE Score*. This BRIDGE Score is based on two key components:

1. **Evidence Volume (Number of Papers):** For each indicator, we counted how frequently each indicator appeared across studies. Indicators mentioned in more papers were considered to have stronger empirical support.
2. **Evidence Strength (Paper Quality):** For each indicator, we calculated the average paper quality score based on ratings assigned during review (i.e., see Table 5 above). Indicators supported by higher-quality studies received higher scores. For predictive studies, quality ranged from 7 to 15.

To combine quality and quantity, we calculated a weighted z-score for each indicator (based on the combined average paper score), which reflects how far above or below average the indicator sits (adjusted for the number of supporting studies). We also adjusted the weight of the z-score to avoid over-penalizing indicators that had high levels of support from descriptive studies¹⁰ (which only received baseline quality scores of 1). We then transformed this weighted z-score into a percentile and mapped it onto a 0–10 scale, where 5.0 represents the average score across all indicators. Thus, scores above 5.0 reflect stronger or more consistently supported indicators, whereas scores below 5.0 reflect indicators that are either less common or backed by lower quality evidence.

The full table of scores by indicator is available on [Google Drive](#) in the “BRIDGE Score Data” file. For each indicator, the file includes individual (i.e., descriptive and predictive) and combined data on study counts, average paper quality, z-scores, and weighted z-scores. Here, we present the top 10 and bottom 10 indicators in Tables 9 and 10, as well as provide a high level of summary by category in Table 11.

¹⁰ We assigned each descriptive paper a weight of 0.089. This was derived from the average quality score of predictive studies (1 divided by 11.25).

Table 9 – Top 10 Indicators according to the BRIDGE Score

Indicator	Category	Total Appearances	Average Study Quality	BRIDGE Score
Deposit max	Payment	7	13.0	6.5
Deposit amount	Payment	22	11.8	6.5
Deposit number	Payment	20	11.8	6.4
Withdrawal variability	Payment	7	12.6	6.3
Age	Profile information	31	11.4	6.3
Bonus amount	Play	7	12.4	6.2
Bet variability	Play	20	11.5	6.1
Withdrawal amount	Payment	12	11.7	6.0
Breadth of involvement	Engagement	27	11.3	6.0
Bonus number	Play	10	11.7	6.0

Table 10 – Bottom 10 Indicators according to the BRIDGE Score

Indicator	Category	Total Appearances	Average Study Quality	BRIDGE Score
Time of day	Engagement	16	10.2	4.7
Bet intensity	Play	22	10.2	4.7
Log in number	Engagement	3	9.3	4.5
Play break	RG tool use	2	9.0	4.5
Active days volatility	Engagement	3	9.1	4.4
Duration	Engagement	16	9.8	4.4
Losses	Play	9	9.5	4.3
Win rate	Play	7	8.7	3.9
Education	Profile information	1	1.0	2.8
Customer contact	Profile information	1	1.0	2.8

Table 11 – BRIDGE Score Summary by Category

Category	Indicator Count	Total Appearances	Average Study Quality	BRIDGE Score
Play	16	247	10.7	5.3
Profile information	13	99	9.6	5.0
Engagement	14	156	10.7	5.1
RG tool use	4	30	7.9	4.2
Payment	18	154	11.2	5.5

CONCLUSIONS AND RECOMMENDATIONS

This systematic review synthesized the current evidence base on behavioral indicators used to identify individuals at risk of gambling-related harm using objective tracking data. A total of 68 studies were included, with 25 classified as descriptive and 43 as predictive. Our central contribution is the creation of the Behavioral Risk Indicators Database of Gambling Evidence (BRIDGE)—a structured and living resource that catalogs indicators by both frequency of use and study quality.

Key Findings

- **Play indicators were the most commonly used category across all studies** (n = 247), followed by Engagement (n = 156), Payment (n = 154), Profile information (n = 99), and RG tool use (n = 30). Despite their frequency, play indicators did not rank highest in evidentiary strength.
- **The Payment category received the highest average BRIDGE Scores**, with 5 of the top 10 indicators related to financial transactions. The top four highest-scoring indicators overall were all payment-related. Indicators such as deposit amount and number consistently appeared in high-quality predictive studies and demonstrated strong methodological support.

- **RG tool use was the least studied indicator category.** While many predictive studies used RG tools (e.g., self-exclusion) as *outcome variables*, few examined these tools as behavioral *predictors* of harm. This suggests a significant gap in the literature, particularly in evaluating how player interactions with RG tools (e.g., time-outs, limit-setting) might serve as early indicators of risk rather than simply endpoints of distress.

As highlighted in prior reviews and reports, the evidence base is difficult to compare and contrast, thus the BRIDGE Score provides a novel and intuitive method for assessing both the volume and quality of supporting evidence. It offers a more objective way to prioritize behavioral indicators than previously available, especially as industry and regulatory bodies seek to operationalize data-driven risk detection.

When comparing BRIDGE findings to recommendations from leading regulatory and industry bodies (e.g., UK Gambling Commission, Senet Group, Ksa, CEN), we observed both convergence and disconnects (see Table 12). Several recommended indicators were well-supported in the academic literature, while others – such as customer-led contact and RG tool use – were rarely studied or poorly reported. For example, although customer contact is a recommended indicator by both the UK Gambling Commission and CEN, only one study in our review included this variable. Similarly, RG tool use, despite being recommended, was the least represented category in our review.

Table 12 – BRIDGE Contrast with Extant Recommendations

Group	Indicator	BRIDGE Indicator or Category	BRIDGE Appearances	BRIDGE Study Quality	BRIDGE Score
Senet	Spend from norm	Bet variability	20	11.5	6.1
Senet	Frequency of play	Bet number	34	10.8	5.5
Senet	Late-night play	Time of day	16	10.2	4.7
Senet	Deposit frequency	Deposit number	20	11.8	6.4
Senet	Failed deposits	Deposit declines	13	10.4	5.0
Senet	Withdrawal reversals	Withdrawal canceled	9	10.7	5.2
Senet	Multiple payment methods	Deposit method	8	11.3	5.5
Senet	Credit cards	Deposit method	8	11.3	5.5
UKGC	Customer spend	Bet amount	52	10.8	5.6
UKGC	Patterns of spend	Bet trajectory	13	11.1	5.6
UKGC	Time spent gambling	Session length	18	11.1	5.6
UKGC	Gambling behavior indicators	Play	247	10.7	5.3
UKGC	Customer-led contact	Customer contact	1	1.0	2.8
UKGC	Use of gambling management tools	RG tool use	30	7.9	4.2
UKGC	Account indicators	Payment	154	11.2	5.5
Ksa	Intensity (losses)	Losses	9	9.5	4.3
Ksa	Intensity (number of playing days)	Active days number	42	11.0	5.9
Ksa	Intensity (sum of stakes)	Bet amount	52	10.8	5.6
Ksa	Loss of control	Loss chasing	13	11.3	5.7
Ksa	Increase in gambling over time	Bet trajectory	13	11.1	5.6
Ksa	Game types	Breadth of involvement	27	11.3	6.0
CEN	Losses	Losses	9	9.5	4.3
CEN	Changes in the use of RG tools	RG tool use	30	7.9	4.2
CEN	Gambling product preferences	Breadth of involvement	17	11.3	6.0
CEN	Time spent gambling	Session length	18	11.1	5.6
CEN	Customer-initiated contact	Customer contact	1	1.0	2.8
CEN	Canceled withdrawals	Withdrawal canceled	9	10.7	5.2
CEN	Depositing behavior	Payment	154 (3)	11.2	5.5
CEN	Speed of play	Bet intensity	22	10.2	4.7
CEN	Volume of stakes	Bet amount	52	10.8	5.6

Deposit related variables were particularly strong according to the BRIDGE database, and these are present in Table 12. However, more research may be needed surrounding payment methods and declined transactions to better understand the strength of those in determining at-risk players.

The disconnect between BRIDGE and current recommendations may reflect data availability constraints, as some data required for engineering specific indicators may not be accessible to independent researchers. But it may also reflect industry practice diverging from the academic evidence base.

Limitations

Despite the strengths of this review, several limitations should be noted. While screening was conducted by multiple researchers to reduce bias, inclusion decisions may still reflect some subjectivity. The living nature of BRIDGE in the future will enable community-driven feedback, allowing others to submit studies or challenge current entries.

While our scoring system captures quantity and quality of evidence, it does not estimate the independent predictive value of each indicator. Most predictive models used in the reviewed studies were multivariate machine learning models, making it difficult to isolate the contribution of individual variables. As the field matures, more interpretable modeling techniques and sensitivity analyses should be encouraged.

The BRIDGE Score draws from established frameworks (e.g., TRIPOD-AI, CHARMS), but includes adapted elements and assumptions. It is intended as a practical tool – not a formal quality assessment instrument – and should be refined as the database evolves, particularly as new techniques and novel data source (e.g., text-based data) emerge. Ongoing refinement is also necessary to account for evolving indicator usage trends. For example, a recent focus on more measurable harms (e.g., financial) may lead to certain indicators having lower scores in the current evidence base.

The review excludes commercially available risk detection tools due to limited transparency. As highlighted in Marionneau et al. (2025), and confirmed in our supplemental scan of platforms such as Mindway¹¹, Future Anthem¹², BetBuddy¹³, Crucial Compliance¹⁴, and Sustainable Interaction¹⁵, little information is publicly available on the indicators or methodologies used by these solutions. This lack of information does not make it possible to include these systems in the BRIDGE database. However, we would like to acknowledge that some authors of studies included in this review are affiliated with two commercial solutions: namely BetBuddy (e.g., Dragicevic et al., 2011; Percy et al., 2016; Sarkar et al., 2016) and Neccton¹⁶ (e.g., Auer & Griffiths, 2023a, 2023b).

Recommendations

As the Ksa noted in their markers of harm report, “it is reasonable to start with a set of indicators that are found to be relevant in the literature, but examining new indicators should be an ongoing process.” We echo this sentiment. By establishing BRIDGE as a shared evidence base, we hope to support this ongoing process by improving algorithmic detection methods, guiding policy decisions, and ultimately contributing to harm prevention efforts. We offer the following recommendations:

1. **Prioritize evidence-based indicators.** As evidenced by this report, a plethora of behavioral indicators have been explored in the literature, and various regulatory bodies and other groups have made recommendations. While it is not possible to define a definitive list of indicators that must be used when implementing player risk detection solutions, a prioritization approach could be considered. Indicators with the strongest evidential support should be prioritized. For example, our BRIDGE findings suggest that payment-related indicators would take precedence based on the quality and level of evidentiary support. However, ongoing collection and assessment of the evidence is vital given the evolving nature of the field.
2. **Standardized reporting guidelines.** The current evidence base reveals significant inconsistency in how studies are conducted and, more importantly, reported. This variation makes it (1) difficult to compare findings across studies, and (2) often results in insufficient information to properly evaluate the effectiveness of behavioral indicators. We recommend the adoption of standardized reporting frameworks (similar to TRIPOD-AI) for studies developing or evaluating predictive models related to gambling harm.

¹¹ <https://www.mindway.ai/>

¹² <https://www.futureanthem.com/>

¹³ <https://www.playtech.com/products/betbuddy/>

¹⁴ <https://www.crucialcompliance.gi/>

¹⁵ <https://www.sustainableinteraction.se/>

¹⁶ <https://www.neccton.com/>

3. **Open data and code.** Very few studies share their underlying data or modeling code, making independent validation of findings nearly impossible. While we recognize that data may be proprietary or sensitive, there are workarounds. For example, Zendle and Newall (2024) created a simulated version of their dataset that allows others to (1) validate their results and (2) build upon their work to advance the field. We encourage similar approaches to promote transparency and replicability.
4. **Address transparency challenges and evaluation of commercial solutions.** At present, there is no standardized way to assess the efficacy of commercial harm detection systems. This lack of transparency poses challenges for regulators and operators alike, including questions around whether these systems are achieving their intended outcomes. The competitive nature of the market adds an additional layer of difficulty. We recommend that future work prioritizes the development of transparent evaluation frameworks for commercial tools used in harm detection. Furthermore, regulators may consider mandating error reporting and independent audits, as well as enforcing explainability standards for these systems.

STUDY 3 – FINANCIAL RISK IDENTIFICATION

Financial risk identification within the gambling sector is an emerging area, it is also one that is neither well understood or defined. Despite widespread recognition of the significant and temporal role that financial harms play in the etiology and experience of gambling-related harms, our understanding of the financial behaviors and habits of gamblers remains notably limited. Thus, stakeholders are currently limited in their capacity to enact intervention efforts targeted at financial risk.

Financial harms from gambling are recognized as significant. Langham et al. (2016) introduced a comprehensive framework for gambling-related harm, comprised of seven dimensions, including relationship disruption, psychological distress, and criminal activity. Within this framework, financial harm presents as arguably the most influential dimension, as it often has an immediate impact on individuals and those around them. These harms also bear substantial temporal precedence, and can act as a trigger for subsequent harms. Furthermore, financial harms are relatively more tangible, via experiences of financial loss and observable changes in spending patterns. Given this significance, it is essential to understand how financial risk can be identified, and to evaluate the methods and technologies available to support effective detection and intervention.

We also currently lack a clear and widely accepted definition of what constitutes “financial risk,” though efforts to define it are emerging. For instance, the Dutch gambling regulator has suggested that individuals should not gamble more than 30% of their disposable income (Fletcher, 2024b). Similarly, the UK Gambling Commission has implemented financial risk checks based on specific thresholds, including “frictionless” checks for individuals who experience net gambling losses of £150 or more over any rolling 30-day period (Gambling Commission, 2022). But as with gambling harms more broadly, financial harms can manifest along a spectrum of severity: at the less severe end, individuals may lose the ability to make hedonic purchases (e.g., luxury goods, vacations), while at the more extreme end, they may struggle to meet essential obligations such as paying for food and housing (Langham et al., 2016). As such, gaining a clearer understanding of how “financial risk” is conceptualized and operationalized is essential to prevent financial harms from gambling.



OBJECTIVES

The objective of this qualitative study was to capture the views and experiences of a group of industry experts on financial risk identification within the gaming industry. We sought to gain a targeted understanding of the technologies and practices used to monitor individual players across various gambling verticals (e.g., brick-and-mortar casinos, sports wagering, and horse racing). The insights gained from these interviews aim to provide foundational information for gaming regulators about potential strategies and the practical challenges associated with implementing strategies for financial risk identification.

METHODS

This study was designed to address the limited availability of academic research on financial risk identification, particularly outside the scope of behavioral risk detection using operator data. As demonstrated in Study 2 of this report, most prior research on player risk has focused on behavioral tracking data from gambling platforms. One recent exception is Zendle and Newall (2024), which explored financial risk using open banking data and the PGSI – although this study did not appear in our initial literature search. Notwithstanding these limited examples, the broader evidence base remains scarce. This gap is further compounded by the lack of a clear definition of what constitutes “financial risk” in the context of gambling.

To address these gaps, we conducted eight in-depth, one-on-one interviews with industry experts who have domain expertise in financial technology (FinTech) and/or responsible gambling. This qualitative approach allowed us to gather rich, contextual insights into the current technologies, practices, and challenges involved in financial risk identification.

We employed a convenience and purposive sampling strategy to recruit individuals with relevant domain expertise. The UK was selected as the focal case study given its mature digital payments infrastructure and recent regulatory developments proposed by the UK Gambling Commission regarding financial risk checks (four participants were from this jurisdiction). Participants included stakeholders from across the financial risk ecosystem (see Table 13), including regulators, academics, and third-party financial technology providers.

Participant	Country	Role
1	UK	CEO and founder, gambling-specific open banking service company.
2	USA	CEO and founder, global self-exclusion program.
3	USA	Technical Lead, single digital wallet solution for online and land-based gambling platforms.
4	UK	Head of Product, open banking service company.
5	Sweden	Postdoctoral researcher studying financial harms in gambling using transaction data.
6	UK	Consultant, consulting firm working with gambling operators.
7	USA	Assistant Professor, university laboratory that examines behavioral addictions.
8	UK	Postdoctoral data scientist working with bank transaction data.

We created an interview questionnaire to guide the conversation, developed according to our specific research questions. The questions included:

- What is the current technology that exists to track individual players across different types of gaming (e.g., brick and mortar gaming, sports wagering, horse racing, etc.) and operators?
- What is the current technology that exists to perform financial risk identification and support player protection in the gambling sector?
 - How do you define financial risk?
- In which jurisdictions are these types of methodologies and technologies being used?
 - Why has adoption been early in these jurisdictions?
 - What are the challenges in these jurisdictions?
- What are the barriers to implementing these proposed methodologies and technologies in other jurisdictions?
 - Specifically, what are the barriers and challenges in the US market.

Two researchers were present for each interview - KG serving as the primary interviewer, MS as an observer and secondary questioner. Each interview lasted between 30 and 45 minutes and was conducted via video conferencing (i.e., Zoom). Audio recordings were transcribed using Zoom's built-in transcription functionality and manually verified by the research team.

Data analysis was performed by MS, who employed a descriptive approach to synthesize the data. First, repeated readings of all transcripts was performed to achieve data immersion. Then, rather than applying formal coding procedures, transcripts were summarized to identify key points, themes, and recurring patterns. This method was appropriate given the exploratory nature of the research and the relatively small number of interviews. To enhance the validity of the synthesis, MS shared and discussed the initial summaries and emerging themes with KG.

FINDINGS

Tracking Players Across Operators

Interviewees were first asked to describe current technologies that exist to track players across different types of gaming. This finding centers on opportunities and challenges of single-player tracking across operators from a harm prevention perspective. While new technologies have great potential to help achieve this goal, data sharing and tracking is a complex task, and gambling stakeholders may meet significant challenges.

When addressing the question of tracking players across operators, respondents' examples clustered around self-exclusion and harm prevention. Respondents emphasized that, although the technical capability now exists, data-sharing remains complex because each operator stores information differently and must first obtain customer consent. Centralized, single-wallet systems in state monopolies such as Norway illustrate what is possible in closed markets, but such a model may be challenging for competitive jurisdictions.

However, respondents explained that progress is being made in jurisdictions with competitive markets. In the UK the Betting and Gaming Council's GamProtect¹⁷ initiative allows operators to share "risk flags" without exposing personal data. An interviewee stressed that, currently, GamProtect represents only a small part of the industry, but the number of affiliated operators is growing, and the interviewee foresees it becoming increasingly utilized. Interestingly, the participant proposed that the UK Gambling Commission should make GamProtect a condition for holding a license to increase adoption. And in the U.S., the Responsible Online Gaming Association (ROGA) is developing an independent clearing-house, while another interviewee described how, with players' consent, their company shares self-exclusion data across operators. This API-driven solution tokenizes self-excluded customers so other operators can recognize them without seeing identifiable details¹⁸.

Reflecting on the challenges of data sharing across operators, another interviewee mentioned some alternative tools available to help prevent harm that do not require operator participation. For example, people who do not want to participate in gambling can use software like BetBlocker or GAMSTOP to block access to gambling websites.

Finally, one respondent highlighted the way certain omnichannel operators – Caesars was cited as an example – already link land-based loyalty cards to online accounts, demonstrating that end-to-end player tracking is technologically feasible. Additionally, another participant speculated on the potential of blockchain in this domain, suggesting it could be particularly useful in addressing data privacy and transparency concerns.

Conceptualizing Financial Risk

After the topic of player tracking, discussion turned to definitions of financial risk. Here, interviewees attempted to define the term, focusing on both the strategies for measuring financial risk and the challenges posed by inflexible and deterministic definitions.

¹⁷ The GamProtect scheme (<https://www.gamprotect.co.uk/>) aims to solve the problem of providing consistent safer gambling protection across multiple platforms. It does this by allowing participating operators to compliantly and securely share information about customers who require support.

¹⁸ API tokenization replaces a user's sensitive data with a cryptographically generated, non-identifiable token. This enables operators to securely verify a customer's self-exclusion status across platforms without needing to exchange or store their personal details.

Providing a UK perspective, a respondent explained how gambling harm appears to be framed through three complementary lenses. The first lens is behavioral: i.e., indicators that arise directly from gambling activity, such as rapid betting frequency or escalating stake sizes. The second is vulnerability, encompassing life events like bankruptcy or job loss that heighten susceptibility to harm. The third is financial, centered on whether a customer's broader spending patterns signal stress.

But most participants viewed financial risk, perhaps more simply, as a function of gambling losses relative to disposable income. Thus, financial risk may only be measurable by having a complete picture of players' financial situations. As a participant explained, if the ratio between sustained net losses and the individual's apparent disposable income over a given period approaches or equals one, the subject could be considered at-risk. However, some highlighted that the nature of these definitions is subjective and, therefore, they depend on individual perspectives and criteria. Reflecting on this, an interviewee mentioned existing research that leverages transaction data fused with PGSI data, which could be used to advance more objective assessment of financial risk amongst gamblers.

Other respondents also emphasized the need for clear risk indicators. For example, a respondent suggested that an efficient indicator could be comparing the cost of living for the physical address of players to assess whether the funds they are using exceed the parameters in their residing region. This entails generating an equation based on elements like monthly mortgage, cost of living, and gambling expenditure to understand the level of financial risk.

Challenges in defining financial risk

Participants explained that obtaining a complete picture of players' financial situations is not an easy task, given that it comprises a series of elements, from salaries to inheritances. As such, a subject might be labeled as at-risk when they are not, and vice versa. Moreover, from the interviews it emerged that definitions of financial risk vary by country and culture, as do the measures to identify it. This is the case with jurisdictions such as the Nordic countries, which tend to prioritize public health approaches over founding policies on individual responsibility, as was viewed as the case in the U.S. For example, as highlighted by one interviewee, the Swedish Government has decided that players cannot spend more than 30% of their income on gambling. Another respondent declared that such measures would not be possible in the U.S. given the public's culture and attitudes around government interventions.

Additionally, a UK-based interviewee emphasized the need to distinguish between *financial risk* and *economic vulnerability*, with the latter having a clear regulatory definition (and being more in line with the three-lens framework above). Vulnerability can be defined via elements such as bankruptcy or CCJs¹⁹ (County Court Judgements), which provide more objective indications that an individual has been facing significant financial issues. On the other hand, *financial risk* is more difficult to define and refers to typologies of financial distress that are less pronounced, such as changes in income, credit scores, and mortgage defaults. Some of this information can be obtained from credit reference agencies (CRAs), but is not publicly available. As such, the link between financial risk and gambling involvement is not clear. However, the interviewee explained that, as automated affordability checks are increasingly used in the UK gambling sector, there is an opportunity to grow that understanding.

Technologies for Financial Risk Identification

Current FinTech Capabilities

Participants described a range of technologies already deployed in payments and compliance that could be repurposed for player-protection. This includes protocols such as PCI DSS (Payment Card Industry Data Security Standard) requirements and penetration testing, while implementing AML (Anti-Money Laundering) and fraud prevention programs. As such, the participant explained that an important next step would be to leverage those tracking systems to detect at-risk players. However, executing such a strategy requires thorough reflection on how to file such reports while protecting customers' privacy and refraining from making direct accusations. Moreover, an interviewee explained a central role of FinTech companies should be creating risk mitigation tools, such as well-being apps that can offer services

¹⁹ If an individual in the UK does not repay a debt, creditors can apply for a CCJ, which is a court order to pay the debt. A CCJ can make it difficult for individuals to get credit in the future.

like setting a budget limit for gambling. This is an important point, highlighting that the responsibility for mitigating financial risk should extend beyond gambling operators to include other stakeholders.

Deposit Limits

One respondent mentioned that some European countries have been enacting global deposit limits as a way to address financial harms from gambling. In Spain, the Directorate General for the Regulation of Gambling has proposed an aggregate deposit limit for individual users across accounts held with multiple operators (Abogados, 2024). Similarly, in Germany, the Interstate Treaty on Gambling introduced a new rule that set a monthly limit of €1,000 across operators (Hofmann, 2024). However, these approaches may overlook important nuances in financial risk, such as differences in individual income levels, by applying a uniform deposit limit to all players. Additionally, implementing such measures requires a centralized system to track deposits and withdrawals something that, as noted above, may be difficult to achieve in more competitive gambling jurisdictions. However, one interviewee pointed to Sweden as an example, and we present this participant's perspective in Box 5.

Box 5 – The Case of Sweden

An interviewee explained that in Sweden, there is a centralized system run by the Gambling Authority that works as a national registry. If people want to gamble online, they must go through that system, which also offers self-exclusion tools. If they feel they are having gambling-related issues, they can ask their account to be paused, and they may not be able to log in to any operators in Sweden. The Swedish authorities are also attempting to utilize this system to verify whether a subject can afford to play, using a credit check. As the respondent pointed out, this represented a significant shift in the Swedish gambling realm since, historically, operators were the only entities tracking users. The participant emphasized that, in the Swedish context, the Gambling Authority is responsible for issuing licenses to operators and can therefore require them to develop action plans outlining how to fulfill this duty of care. However, 30% of operators in Sweden are unlicensed and are often served by FinTech companies. An issue here is that Swedish gambling authorities do not have direct control over Fintech companies, which fall under the financial inspection branch instead. This creates a situation where regulators have limited reach on FinTech companies unless there is a clear mandate from the government.

Banks

Banks represent a clear, yet underutilized, avenue for identifying financial risk. Participants did emphasize the importance of reflecting on the role of financial institutions in preventing harm caused by gambling. However, most interviewees explained that banks are not typically required to undertake an active “policing” function. As such, unless regulators directly ask them, it is unlikely that banks will voluntarily undertake specific actions. Interviewees explained that banks are hesitant to conduct gambling-related checks mainly because, by sharing sensitive data, they could incur legal problems and significant fines. According to a respondent, steps in this sense could be taken if financial conduct authorities led the process, by guiding banks with specific approaches to preventing gambling harm.

However, concerns were also raised about unintended consequences. One interviewee warned that if banks gain access to detailed gambling transaction data, they could use it to make adverse decisions about customers—such as raising interest rates—based on gambling behavior. Moreover, gambling regulators already face significant challenges in getting banks and payment providers to comply with existing mandates, such as blocking transactions to unlicensed operators.

Although participants acknowledged the need for stronger collaboration between banks and regulators on financial risk detection, most expressed skepticism about the likelihood of meaningful progress in the near term.

Credit Reference Agencies

Another avenue is credit reference agencies. An interviewee explained that the technologies used by credit reference agencies could be helpful to identify financial risk in gambling. According to them, the systems they already have in place to assess people's financial health and ability to afford, for example, mortgage and car loans, should be expanded to the gambling industry. However, it is necessary to reflect on how to incentivize relationships between these agencies and operators, which might not be motivated to do so. As such, the participants wondered whether regulators should compel gambling companies to leverage CRA data.

However, one participant underscored that, while this “passive” data has reasonable levels of accuracy, especially in tracking significant publicly available objective markers (CCJs, bankruptcy, etc.), it only detects individuals who are in

high-risk situations. Thus, someone who is at moderate risk and has never had a bankruptcy issue may not be detected. On the other hand, more “active” data, as they described it, can now be shared with the user’s consent via *open banking*, providing direct access to detailed information, such as their bank statements. Thus, this detailed level of analysis represents a more efficient method for evaluating financial risk.

Open Banking

Interviewees noted that open banking systems, which enable third-party providers to access banking transaction data with consumer consent, are assuming an increasingly prominent role in financial risk identification. Thus, they described opportunities and challenges in this regard, with particular reference to the UK, which they defined as one of the most innovative.

Open Banking is part of the European Union’s Payment Services Directive 2 (PSD2), which allows third-party payment service providers to access payment account information and initiate payments with customers’ consent. In the context of risk identification, the transaction-level bank statement data made available through open banking is particularly valuable. According to one respondent, the key strength of this system lies in its ability to support independent and objective analysis of detailed financial behavior. One example of its growing potential is the significant investment by CRAs in open banking companies, driven by the accuracy and reliability of the data they provide. Moreover, the UK Gambling Commission has identified open banking as a potential technology to support financial risk checks.

However, several participants also pointed to practical and ethical challenges. One participant explained that when the Commission first proposed the use of open banking for risk checks, it was met with concerns from both operators and players, particularly regarding transparency around how data would be used. In response, the Commission launched an industry consultation that ultimately led to a shift in approach—proposing the use of credit bureau data instead, as it does not require user consent. According to the participant, another reason for this shift may be that the more information operators hold about a player, the more accountable they become. For example, if an operator learns that a customer has a low-paid occupation, they may be obligated to intervene and could face increased regulatory scrutiny. This, the respondent suggested, disincentivizes operators from investing in proactive, technology-based tools—such as open banking—to detect at-risk players.

Another interviewee, who had conducted research on open banking for the UK Gambling Commission, underscored technical limitations in applying the technology to gambling-related harm prevention. While they had access to large datasets on users’ financial accounts, they faced significant challenges in classifying and identifying gambling transactions. They noted that transaction labels are often poor in quality, merchant category codes are frequently missing, and third-party tools used to classify merchants have yielded unsatisfactory results. Although legal gambling operators can be identified through the Gambling Commission’s registers, the same is not true for illegal operators, making it difficult to assess the full scope of gambling-related harm. As the interviewee remarked, they were left wondering “whether absence of evidence is evidence of absence.”

Challenges also exist around consumer adoption. Open banking systems rely on users providing explicit consent to share their banking data. Interviewees highlighted generational divides in this regard: younger individuals, particularly those aged 20 to 35, are generally more comfortable using open banking apps and sharing data with third parties. Importantly, these demographics may also align with more engaged gamblers (Ghaharian et al., 2025). In contrast, older generations tend to be more skeptical of such tools, especially when it comes to data privacy.

Furthermore, open banking frameworks vary significantly across jurisdictions. Interviewees described the U.S. as having a comparatively immature open banking ecosystem. While similar services exist, they are typically based on “screen scraping” techniques, where user credentials are used to extract data from bank accounts, rather than more secure and standardized API protocols (as mandated in the UK and EU).

Barriers to Implementing Financial Risk Identification

This final section outlines the various challenges gambling stakeholders may face when attempting to implement financial risk identification using emerging technologies. Participants discussed a range of issues, from outdated technological systems and weak data-sharing practices to privacy concerns and regulatory limitations. Below, we summarize the key barriers raised by interviewees.

Obsolete technology

A prominent issue identified by one interviewee is the continued reliance on outdated technology or methods. Current systems often use static thresholds, either government-mandated or internally defined, and rely on manual processes, such as requesting bank statements or conducting online searches about a player's employment when a red flag is triggered. These tools are rudimentary and, according to the participant, insufficient for the early detection of at-risk individuals.

Lack of cross-operator data sharing

While cross-operator tracking would be key in financial risk identification, an interviewee explained that, at present, it is challenging to achieve because collaboration among separate entities can be difficult. Thus, despite technical capabilities, data sharing among operators will not be accomplished in the short-term. One participant pointed out that, beyond legal and logistical hurdles, there is currently no third-party oversight of how operators handle customer data once acquired. Additionally, the ability to analyze behavior across operators is complicated by dual-channel offerings: many brands operate both online and land-based platforms, making it difficult to distinguish the precise context of transactions.

Multiple apps and profiles

Participants highlighted the fragmentation of user data as another key barrier. In many jurisdictions, land-based and online accounts are not integrated, meaning the same individual may appear as two distinct players in internal systems. Further, operators offering multiple apps, such as BetMGM in the U.S., have allowed users to register separately in different states or platforms, sometimes to exploit sign-up bonuses. This fragmentation severely limits operators' ability to monitor aggregate spending and undermines RG efforts.

Data sharing between operators and regulators

Among the many challenges to implementing financial risk identification systems, an interviewee explained that regulators are cautious when requesting data from operators, as it could be perceived as a sign of mistrust. Once regulators obtain such data, operators may fear they may lose control over its use, leading to reputational damage or punitive consequences. As such, participants stressed the importance of building systems that encourage transparent and secure data exchange.

Operators discouraged from tracking players

According to an interviewee, a pressing issue is that operators are discouraged from tracking at-risk players in the first place, as they drive the majority of casinos' revenue. Regarding this point, the same person explained that there might be a misconception that someone who gambles extensively is automatically considered at risk, and therefore, tracking their activities could lead to misleading results. This is particularly the case with operators not being willing to track the so-called high rollers, who bet large amounts of money but whose wealth can mitigate potential losses. These cases, however, are often not risk-free since, even if the financial risk is mitigated, there might be some psychological harm deriving from problematic gambling behaviors.

CRA-related risks

Some interviewees cautioned against using major credit reference agencies, such as TransUnion, to conduct risk assessments. While these companies offer detailed financial data, there are concerns around consumer discomfort with the depth and breadth of personal information collected—and particularly how that data is commercialized. As an alternative, one participant advocated for using firms that specialize in gambling-specific financial insights, rather than generalist data conglomerates.

Privacy and consent

Across interviews, privacy emerged as a central concern, especially in contexts where data sharing spans operators, regulators, and third parties. Participants noted that players are increasingly asking who has access to their personal information and for what purpose. Interviewees stressed the need for financial risk identification frameworks to uphold strong principles of data protection and transparency.

Regulators' technical implementation challenges

Regulators themselves face capacity challenges. One participant noted that implementing robust risk identification systems requires deep technical knowledge (particularly in data science and research design), which many regulatory bodies currently lack. The high cost of recruiting or upskilling staff creates an additional hurdle. For example, in the Netherlands, operators encountered issues when sharing data with regulators, due to both system limitations and weak data governance. As such, interviewees argued that regulators must prioritize investment in internal expertise and technical infrastructure, potentially by reallocating resources (e.g., through a levy on gross gaming revenues).

Land-based vs. online casinos

Interviewees consistently observed that tracking player behavior is far more difficult in land-based venues than in online settings. However, some jurisdictions are beginning to require carded play in physical venues, which may help bridge this gap and improve tracking capabilities in the future.

Risk of displacement to unregulated markets

Finally, several participants raised concerns about the unintended consequences of financial risk identification policies, such as those in the UK and the Netherlands. Financial risk checks that require sharing bank statements or detailed personal data may lead some consumers to disengage from regulated platforms altogether. In doing so, they may migrate to unregulated markets where privacy is less scrutinized but protections are also far weaker.

CONCLUSIONS AND RECOMMENDATIONS

This study explored the emerging area of financial risk identification within the gambling sector, addressing current conceptualizations, available technologies, and practical implementation challenges. While stakeholders increasingly recognize the importance of financial harms, the absence of a shared definition of “financial risk,” combined with fragmented data systems and weak cross-sector collaboration, continues to limit effective implementation. Jurisdictions such as the UK, Sweden, and the Netherlands are piloting approaches ranging from deposit limits to CRA- or open banking-enabled affordability checks, but adoption varies widely and raises questions about privacy, consent, and unintended consequences.

Key Findings

- **Conceptual Ambiguity:** There is no universally agreed-upon definition of financial risk in gambling. Respondents indicated various approaches, ranging from simplistic loss-to-income ratios to more nuanced assessments of financial behaviors, highlighting ongoing challenges in operationalizing clear and effective risk criteria.
- **Technological Potential vs. Implementation Barriers:** Advanced technologies such as open banking, credit reference agency data, and blockchain are currently available to support financial risk identification. However, practical challenges, including data classification difficulties, privacy concerns, consent issues, and uneven adoption rates, significantly constrain their current use.
- **Cross-Operator Data Sharing:** Single-player tracking across multiple operators remains a major challenge, complicated by fragmented data infrastructures, privacy concerns, and competitive market dynamics. Existing solutions, such as GamProtect in the UK and centralized systems in state monopolies, demonstrate feasibility but are limited in widespread application.
- **Regulatory Barriers:** Regulators face significant technical, financial, and capacity challenges in implementing comprehensive risk identification frameworks, which complicate efforts to standardize and enforce effective player protection measures.

Limitations

The study's exploratory nature and qualitative approach mean findings are context-dependent and based on a relatively small sample of industry experts primarily from the UK. The findings therefore reflect the views and perceptions of these participants at the time of the interviews and do not necessarily represent the full scope of existing practices or solutions in all jurisdictions.

Future research should broaden geographic scope and incorporate quantitative analyses to validate qualitative insights and further refine definitions and measurements of financial risk. For example, future research could explore how

different definitions of financial risk perform in practice, through experimental or quantitative studies leveraging linked self-report, behavioral, and financial datasets. Additional studies examining consumer perspectives and attitudes toward privacy, consent, and data sharing would also further our understanding.

Recommendations

Based on the findings, regulators exploring financial risk identification should consider the following actions:

1. **Establish a Clear Financial Risk Definition:** Benchmark against international practices and review relevant literature from gambling and related sectors.
2. **Explore Pilot Programs:** For example, such as the UK Gambling Commission's pilot on financial risk assessments (Gambling Commission, 2025c). Moreover, the exploration of novel technologies, such as open banking, should be conditional on first addressing key consumer issues, including privacy, consent, and representativeness challenges.
3. **Facilitate Cross-Operator Tracking:** Support industry-led initiatives, potentially through government collaboration. For example, the UK's GamProtect is supported by the Betting and Gaming Council (a trade association) and the Gambling Commission (the regulator).
4. **Bolster Regulatory Data Infrastructure:** Invest in robust data systems and technical expertise, either internally or via third-party services (e.g., as demonstrated by ROGA's recent RFP).
5. **Assess Displacement Risks:** Conduct targeted consumer research to better understand potential displacement to unregulated gambling markets.
6. **Explore Mandatory Carded-Play Systems:** Evaluate the feasibility of implementing mandatory carded-play tracking systems in land-based venues.

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IGI is home to an industry-focused advisory board (<https://www.unlv.edu/igi/advisory-board>), and specific programs, such as AiR Hub, have their own advisory panels. These advisory roles include resource support, and individual advisors are required to adhere to IGI policies. IGI maintains a strict research policy (<https://www.unlv.edu/igi/research-policy>), as well as a partnership and transparency framework (<https://www.unlv.edu/igi/policies/partnership>), to ensure appropriate firewalls exist between funding entities and IGI's research and programs.

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APPENDIX

Table A1 – Low-Level Indicator Descriptions

Indicator	Description
Accounts number	Number of betting accounts a player has.
Active days number	Count of number of days with a wager.
Active days trajectory	Some computation (e.g., slope, delta) of the change in active days over a time period.
Active days volatility	Some computation (e.g., standard deviation) of the count of active days.
Age	Age of the player.
Balance low	Indicators that represent when a player finishes a session with a low balance on their account.
Balance total	Similar to Net loss, but typically calculated at the wallet or account level.
Balance trajectory	Some computation (e.g., slope, delta) of the change in Balance total over a time period.
Bet amount	Some computation (e.g., total, average) of the monetary amount that has been wagered for bets.
Bet intensity	Some computation to reflect how many bets have been placed by a player in a specific time period (e.g., bets per session, bets per day).
Bet number	Count of bets made by a player.
Bet trajectory	Some computation (e.g., slope, delta) of the change in bets (e.g., amount, number) over a time period.
Bet variability	Some computation (e.g., standard deviation) of a player's betting behavior (e.g., amount, number).
Bonus amount	The monetary value of bets made with Bonus credits (i.e., not player's money).
Bonus number	The count of wagers made using Bonus credits.
Brand	Indicates whether a player is engaged across multiple brands (e.g., different operator or supplier online casino/sportsbook brands).
Breadth of involvement (e.g., games)	Indicators related to players' engagement across products and/or games (e.g., poker, sports betting, casino).
Canceled wager	Indicators related to when a player has changed their mind and canceled a wager that has been made.
Change personal info	When a player has made some change to their account information (e.g., name, contact information, etc.).
Country or location of player	The country or location of a player based on their account information.
Customer contact	A variable that indicates a player making contact with a gambling operator (e.g., bonus request).
Day of week	Indicators related to the day of week a player is engaged in betting activity.
Deposit amount	The monetary amount of deposits to a gambling account (i.e., from bank or other payment method).
Deposit approved	The count or amount of approved deposits.
Deposit declines	The count or amount of deposits that were declined.
Deposit intensity	Some computation to reflect how many deposits have been placed by a player in a specific time period (e.g., per session, per day).
Deposit max	Indicators related to the largest deposit amount (e.g., for a single deposit, within a time period).
Deposit method	Typically, the count of payment methods used and/or use of credit cards to make deposits to a gambling account.
Deposit number	Count of deposits made by a player.
Deposit variability	Some computation (e.g., standard deviation) of a player's depositing behavior (e.g., amount, number).
Duration	Calculation of a players amount of time spent gambling (e.g., number of days between earliest and last day gambling within a time period).

Education	The education level of a player (e.g., high school, college, etc.).
Employment status	Employment status (e.g., employed, unemployed).
First deposit amount	The monetary amount of a player's first deposit.
Gender	Male, female, etc.
Income	Income of a player (e.g., annual salary).
Log in number	Count of the number of times a player has logged into a gambling platform.
Loss chasing	Indicators constructed to operationalize loss chasing behavior (e.g., across sessions, across days, correlations, increases in stake size).
Losses	Total monetary amount of lost bets.
Marital status	Married, single, etc.
Net loss	Calculation of a player's "position" over a specific time period (e.g., amount wagered minus amount won).
Platform (e.g., mobile)	Reflects a player's engagement across different technological platforms (e.g., mobile, desktop, etc.).
Play break	Indicators related to player's taking a break or pause from gambling.
Player value or VIP status	Indicators denoting the VIP status or value of the player to the operator.
Product risk	Indicators related to reflecting the "riskiness" of different games or wagers (e.g., choice of odds).
Recency	Indicators related to how "new" a player is (e.g., sign up date).
Removal of RG tools	A variable that reflects a player taking the action of removing RG settings (e.g., removing a limit).
Sawtooth pattern	Indicator computed to reflect steady increase in wagers with a sudden drop.
Season	Time of year of play.
Self-exclusion	Indicates use of self-exclusion tool by a player (e.g., count, binary).
Seniority	How long a player has had a relationship (account) with an operator.
Session intensity	Some computation to reflect how many sessions have been made by a player in a specific time period (e.g., sessions per day).
Session length	The length of time of a session (e.g., average, total).
Session number	Count of sessions made by a player.
Set limit	Indicates use of limit setting features by a player (e.g., number, binary).
Time of day	Typically used to indicate night play.
Win rate	Indicates how often a player experiences winning bets (e.g., number of days has a win, percentage of bets with a win).
Wins amount	Total monetary amount of all winning wagers.
Wins number	Count of winning wagers.
Withdrawal amount	The monetary amount of withdrawals to a gambling account (i.e., from bank or other payment method).
Withdrawal approved	The count or amount of approved withdrawals.
Withdrawal canceled	Indicates the occurrence of a player cancelling a withdrawal from gambling account to financial account (e.g., amount, number).
Withdrawal deposit ratio	A measure that compares the total amount of money withdrawn from gambling accounts to the total amount deposited.
Withdrawal number	Count of withdrawals made by a player.
Withdrawal variability	Some computation (e.g., standard deviation) of a player's withdrawal behavior (e.g., amount, number).

UNLV

INTERNATIONAL GAMING INSTITUTE

AI and Player Risk Identification - Research Report Summary

Massachusetts Gaming Commission Meeting
November 6th, 2025

Knowledge.

Research.

Innovation.

Kasra Ghaharian, Ph.D.

Director of Research, International Gaming Institute

Co-founder  **AIR HUB**

Research Objectives

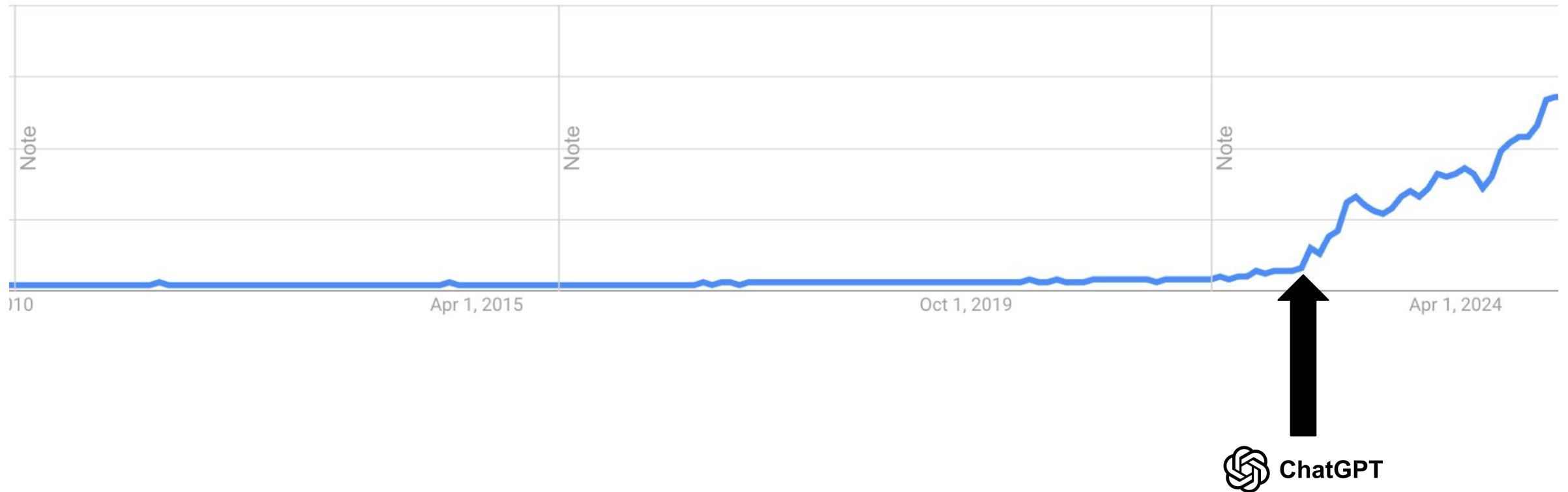
1. Identify use cases and ethical concerns of current and future applications of AI - **STUDY 1.**
2. Understand the evidentiary support for behavioral markers of harm used for player risk detection - **STUDY 2.**
3. Obtain a targeted understanding of financial risk identification and the technology that exists to track players across operators and gaming modalities - **STUDY 3.**

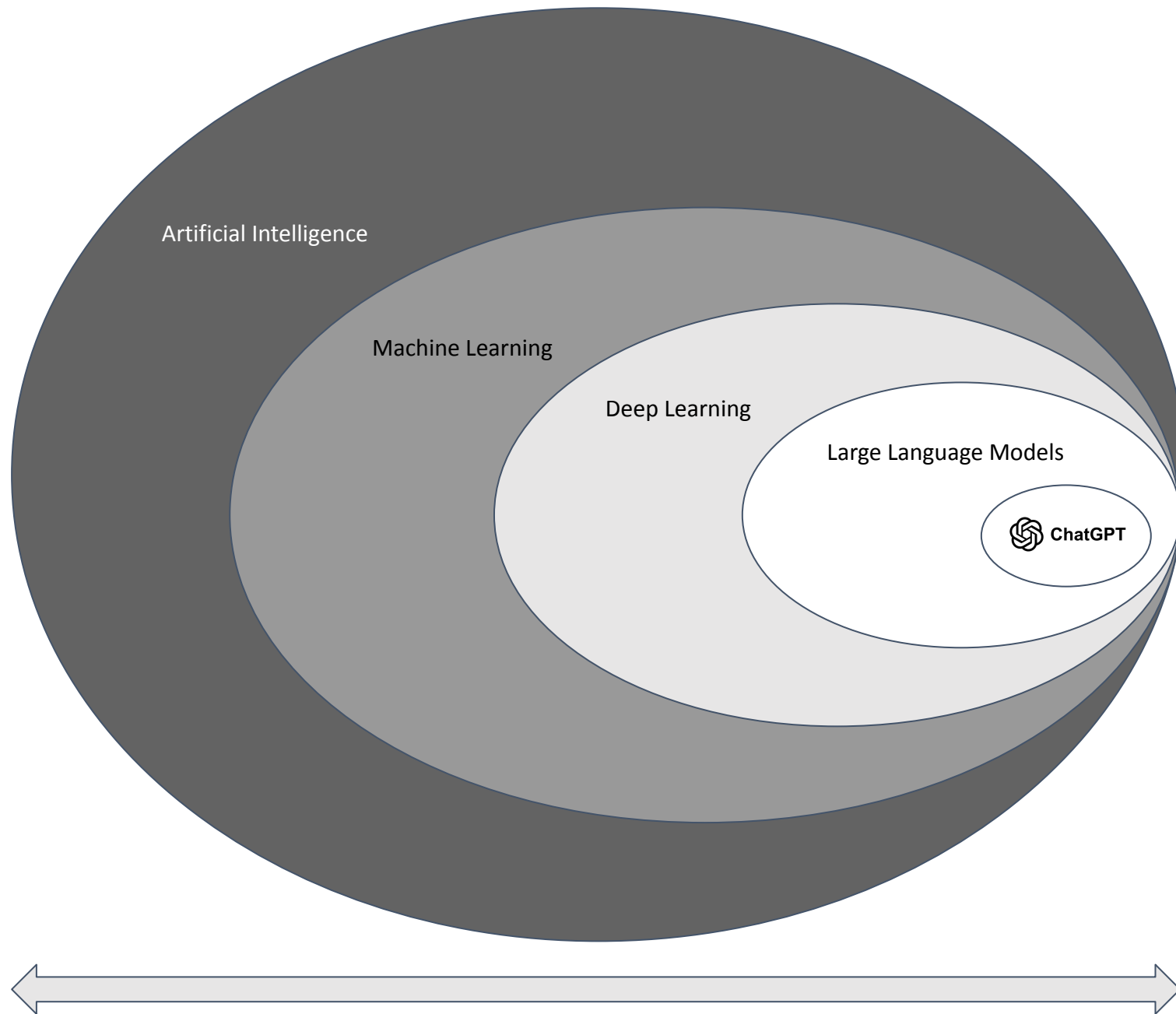
STUDY 1 - AI Use Cases



<https://spectrum.ieee.org/dartmouth-ai-workshop>

Interest over time for search term “ai”





STUDY 1

Via focus groups...

1. How do participants define current uses of AI in the gambling industry?
2. What do participants believe are the possible future uses of AI in the gambling industry?
3. What do participants believe are the risks and ethical considerations of AI applications in the gambling industry?

STUDY 1

Current AI Use Cases

Four main themes:

1. Operational Efficiency and Workforce Augmentation
2. Customer Relationship Management
3. Player Experience and Engagement
4. Compliance and Risk

Theme	Use Case Areas	Example applications
Operational Efficiency and Workforce Augmentation	Policy and documentation	Using LLMs to draft internal HR policies
	Coding	Analysts using Copilot to write and review code
	Content generation	GenAI tools to create slot machine assets (e.g., graphics)
	Task support / communication	Drafting emails and copywriting, troubleshooting, etc.
	Reporting and analytics	LLMs used to interpret analyses and extract key findings
	Business optimization	Staffing forecast models integrated with LLMs
Customer Relationship Management	Player valuation	Using machine learning to identify high value players
	Offer optimization	Using predictive models to calculate elasticity estimates
	Campaign personalization	GenAI to tailor content using player data and preferences
	Acquisition strategy	Models to optimize cost per acquisition
	Asset optimization	Models for allocation of room comps
Player Experience and Engagement	Personalization	Automatically select coin sizes for online slots
	Recommender systems	Recommending games based on peer groups
	Augmented content	Using vision AI to overlay data on live sports feeds
	Customer support	Customer service chatbots trained on policies and FAQs
	Behavioral nudging	Automated prompts to influence deposit behavior
Compliance and Risk	RG – risk identification	Machine learning models to assess player harm potential
	RG – messaging	Automated based on thresholds (e.g., spending or time)
	AML	Detection of suspicious transactions and bonus abuse
	KYC	Vision AI for player identity verification
	Security	Vision AI to detect firearms
	Bad actors (customers)	Using AI for location spoofing and deepfakes

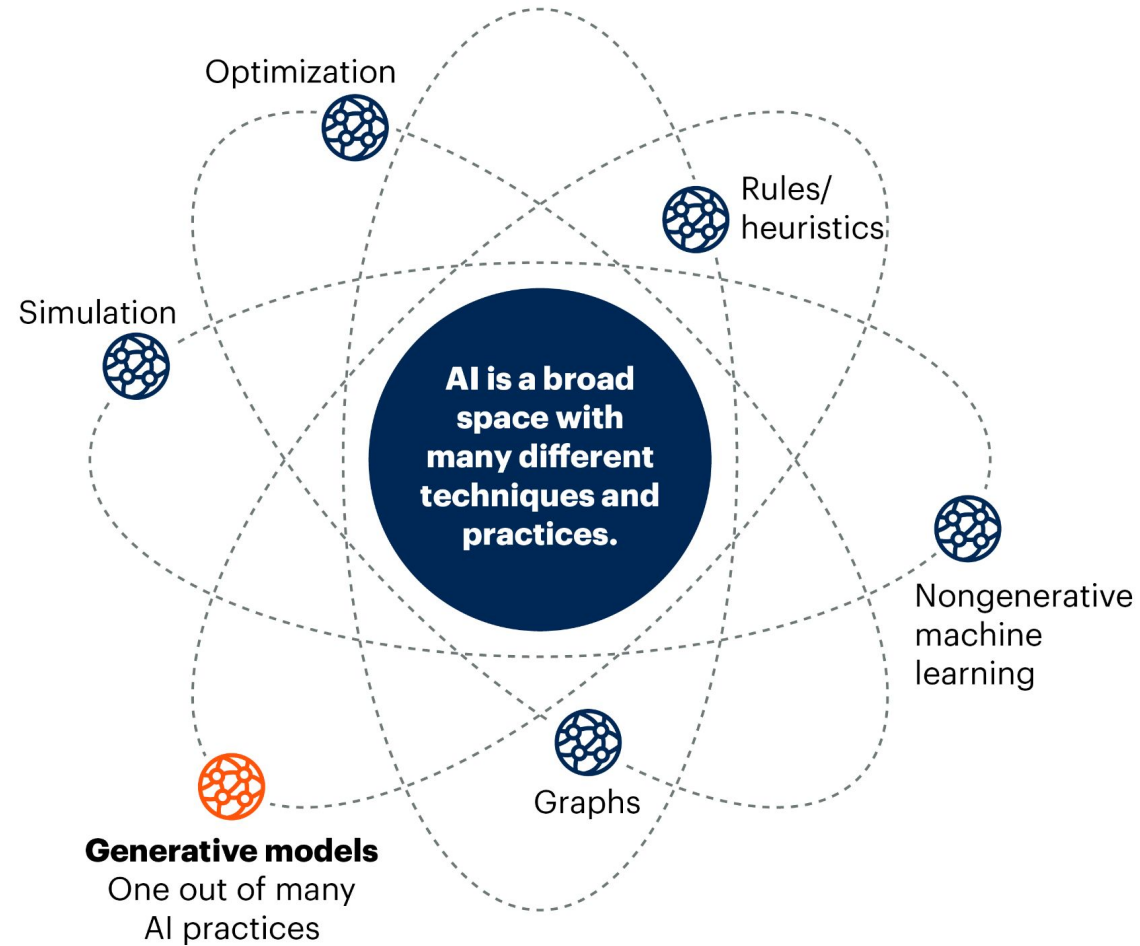
STUDY 1

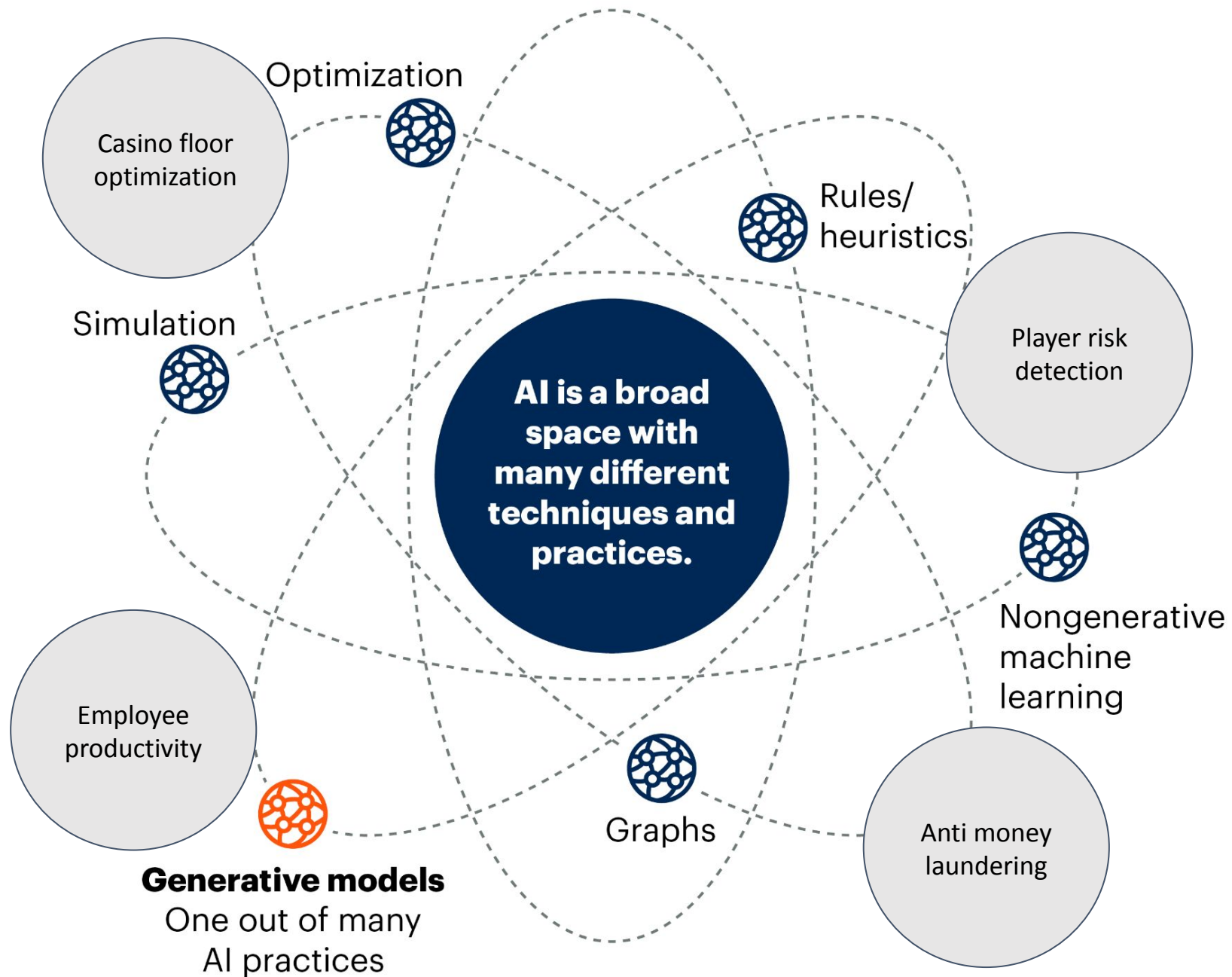
Traditional AI

“The same methods have been applied in the 1990s and early 2000s. But the computational power simply wasn’t there. Now you have that power, and you can process so many different data points. What we used to call machine learning, now we gravitate to the term AI.”

—*Gambling AI Expert*

AI Does Not Revolve Around GenAI





STUDY 1

GenAI = Speed and Scale

“The pressures to get new content out at speed is huge. AI is perfect. Suddenly you’ve got a room full of developers.”

“LLMs will take all your training literature, and it will give you a customer service agent with the equivalent of 3 to 6 months experience out of the box.”

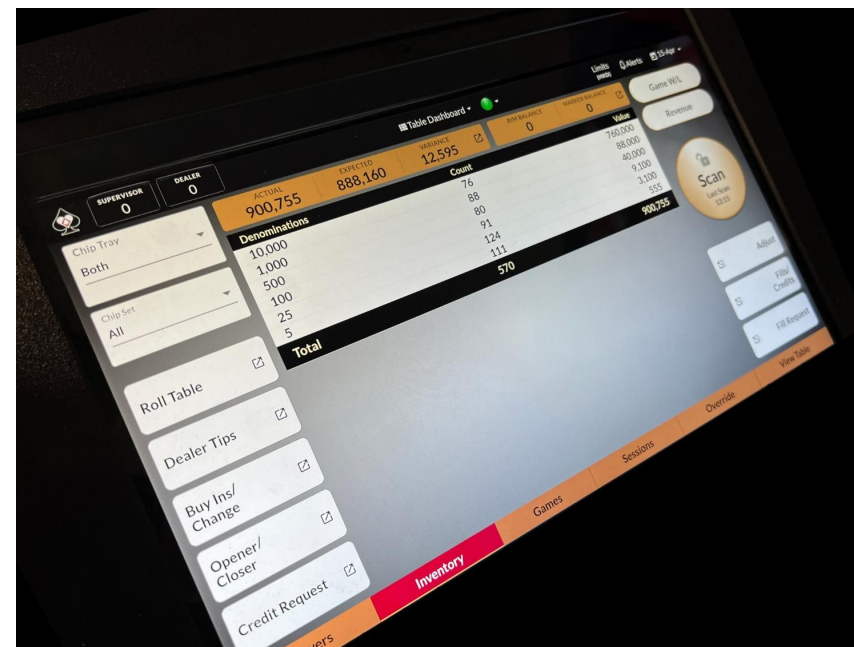
“Scaling insights and best practices across the entire player database.”



STUDY 1

Future AI Use Cases

- Novel data sources powering novel use cases

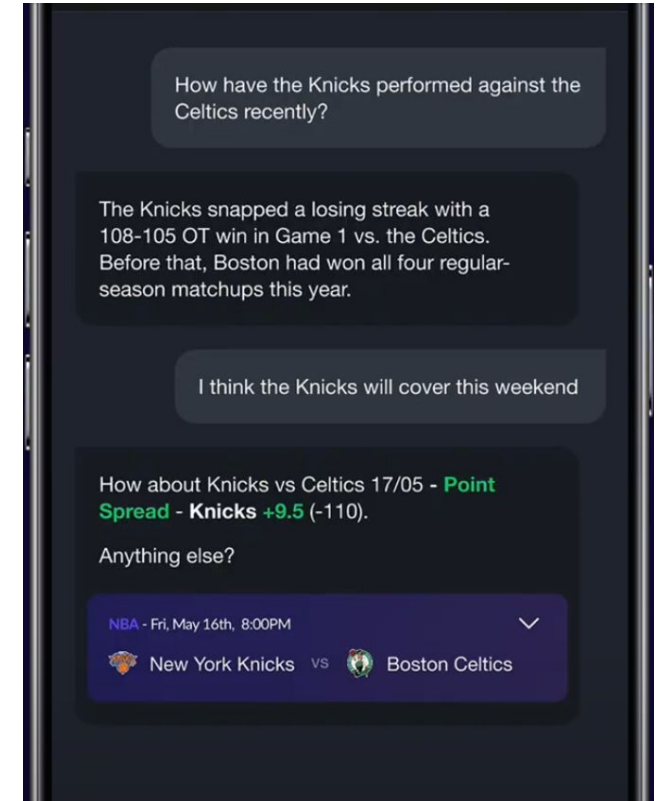


STUDY 1

Future AI Use Cases

- Agentic AI

“a category of AI systems capable of independently making decisions, interacting with their environment, and optimizing processes without direct human intervention”



promptbet.ai

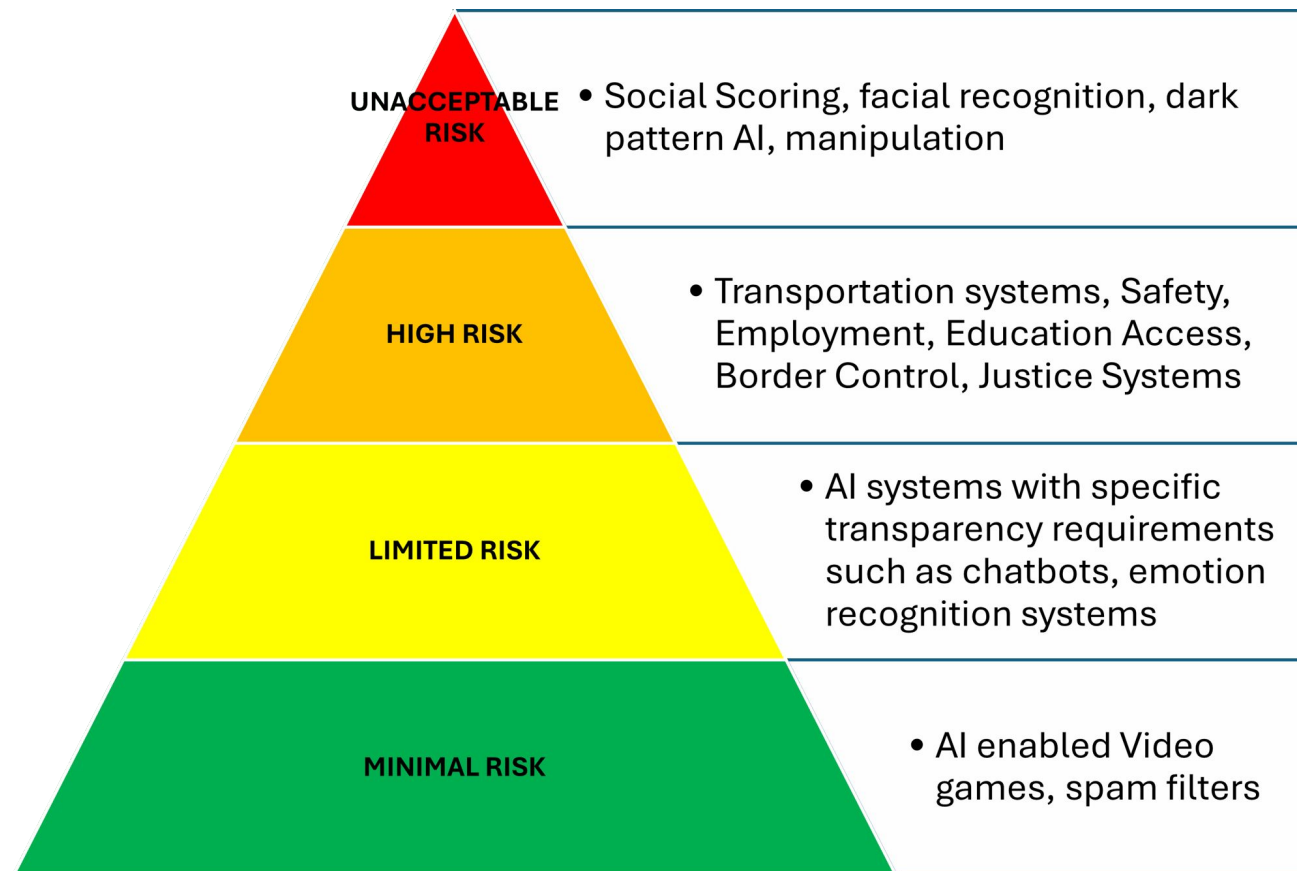
STUDY 1

Risks

- Hyper-personalization
- Human agency (agentic AI)
- Employee understanding and operational preparedness
 - LLMs (e.g., hallucinations, harmful outputs, abstaining)
- **Appropriate regulatory understanding and action**

STUDY 1

The EU AI Act



Prohibited AI Systems

AI systems:

- deploying **subliminal, manipulative, or deceptive techniques** to distort behaviour and impair informed decision-making, causing significant harm.
- **exploiting vulnerabilities** related to age, disability, or socio-economic circumstances to distort behaviour, causing significant harm.

“The gambling industry is going to need to dissect all of its use cases for AI and make it pretty clear that none of the use cases fall within the category of prohibited AI.”

—*AI Lawyer*

STUDY 1

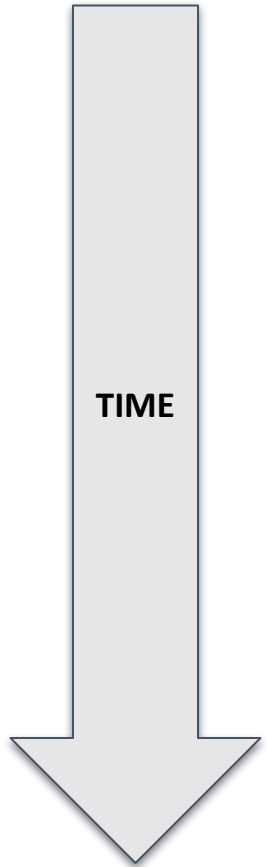
Responsible AI in Gambling

- Using foundation language models as an example...
- If used in customer facing scenarios such as chatbots for account information or betting assistants:
 - What evaluation has been performed before implementation?
 - What ongoing evaluation procedures are in place?
 - Has it been evaluated for specific risks, e.g.:
 - information leakage
 - manipulation
 - persuasive nudging
 - advising on betting decisions

STUDY 1

Recommendations for Regulators

- Appoint an internal AI champion or task force
- Support industry training and internal governance
- Survey licensees' AI use cases
- Engage in cross-agency dialogue
- Develop sector specific AI-guidance



STUDY 2 - The BRIDGE

Systematic Review

STUDY 2

The BRIDGE Database

Behavioral **R**isk **I**ndicators **D**atabase of **G**ambling **E**vidence

- Evaluate the evidence that exists to support behavioral risk identification.
- Regulatory bodies are increasingly mandating the use of data-driven approaches to player risk detection.
- However, an ongoing challenge is providing guidance and determining which indicators are most effective for modeling risk.



A presentation at ICE London in February 2024 revealed nine key markers of harm: losses, changes in the use of responsible gambling tools, gambling product preferences, time spent gambling, customer-initiated contact, canceled withdrawals, depositing behavior, speed of play, and volume of stakes. October 2025 CEN voted to approve a draft framework on gambling harm markers, finalization by early 2026.



The UK Gambling Commission's list, includes: customer spend, patterns of spend, time spent gambling, gambling behavior indicators, customer-led contact, use of gambling management tools, and account indicators



Kansspelautoriteit

The Ksa categorizes its indicators into five domains: intensity, loss of control, increase in gambling, operator behavior, and features of the games.

STUDY 2

The BRIDGE Database

Behavioral Risk Indicators Database of Gambling Evidence

- Development process around these current recommendations is unclear.
- Drawing strong inferences from existing research remains challenging.
- As noted in the Ksa report...

“some indicators have been studied extensively, while others have only been studied a few times,”

and

“even when indicators were studied multiple times, they were often operationalized in different ways and that makes comparisons difficult.”

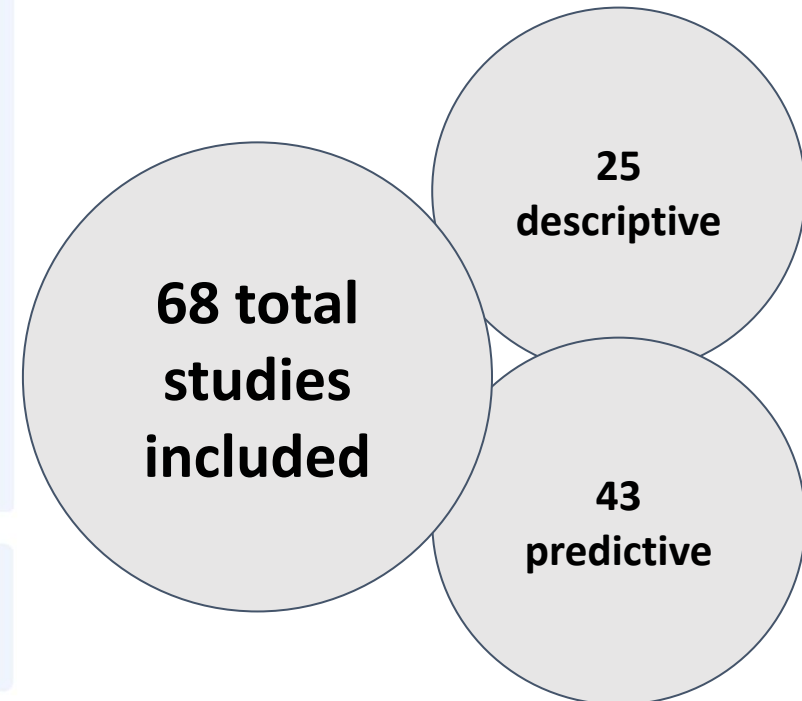
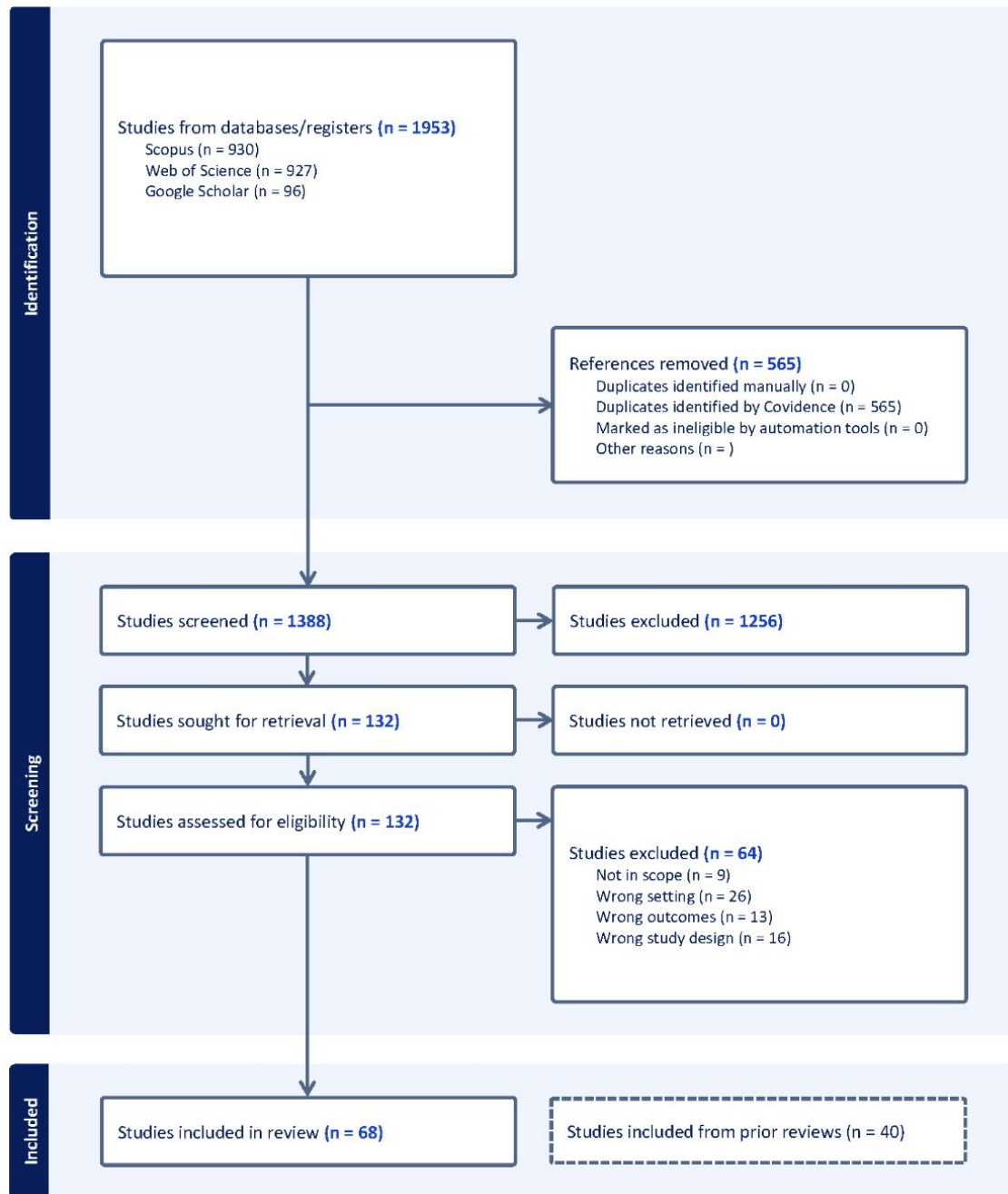
STUDY 2

The BRIDGE Database

Behavioral **R**isk Indicators **D**atabase of **G**ambling **E**vidence

- We conducted a SYSTEMATIC LITERATURE REVIEW, specifically to understand the strength of evidence supports individual markers of harm.
- While several reviews are related to this topic, their scopes are broader.
- It has been acknowledged that the number and nature of predictors are often unclear or inconsistently reported.
- We set out to address this challenge...

What is the **LEVEL** and **QUALITY** of evidence for individual markers of harm?



Given the variability and inconsistency in indicator reporting we created a tiered categorization scheme:

65 low-level indicator categories...

Grouped into 5 high-level categories...

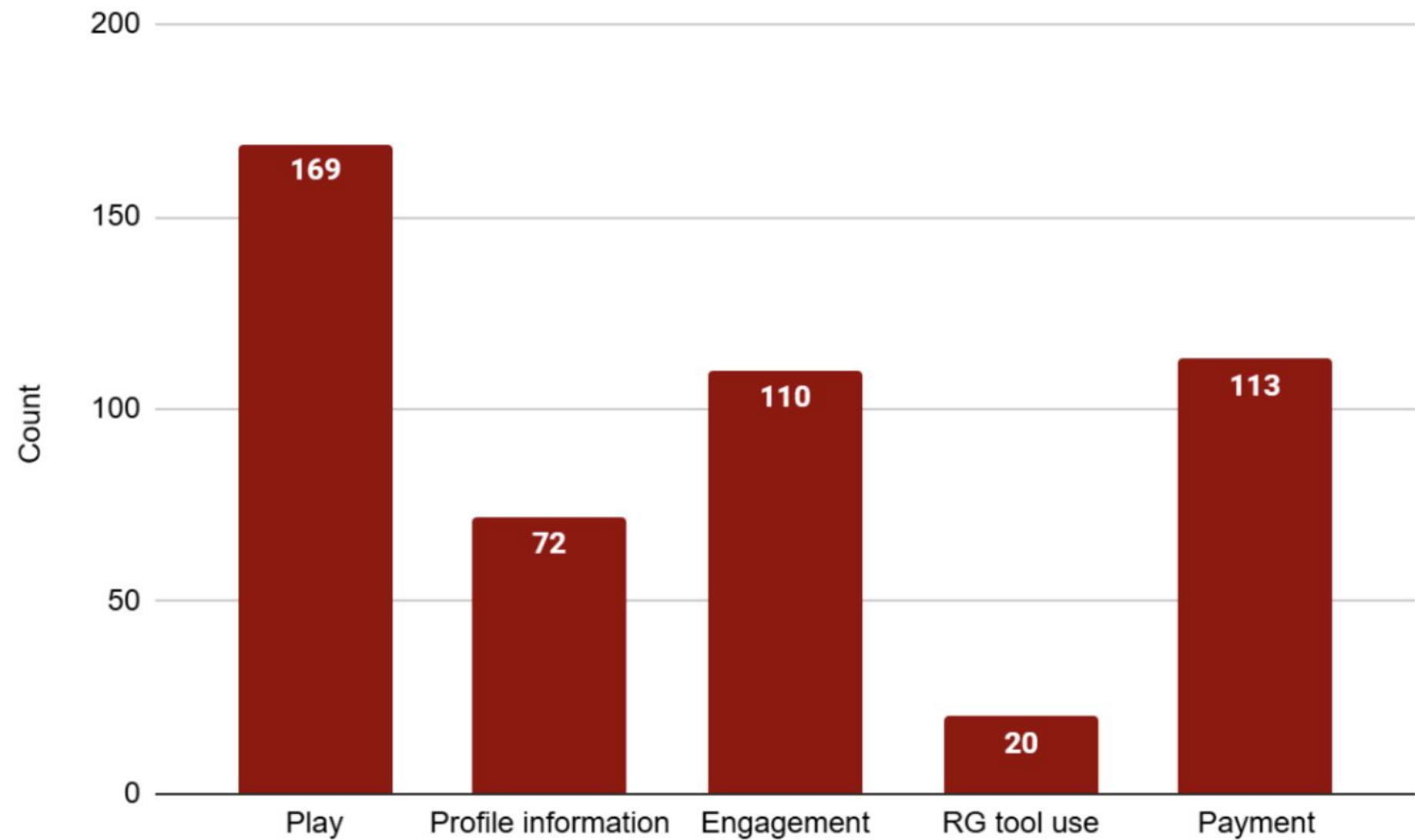
Indicator	Description
Play	Indicators related to betting/wagering behavior, such as bet frequency and size.
Profile information	Static account or demographic attributes, such as age, gender, or registration date.
Engagement	Indicators of when, how often, and how broadly a player interacts with games or platforms.
RG tool use	The use of responsible gambling tools, such as deposit limits, time-outs, or self-exclusion.
Payment	Financial transactions related to the gambling account, e.g., deposits, withdrawals, payment methods.

This allowed us to track usage of indicators across studies, i.e., the **LEVEL** of evidence.

Top 20 Indicators Across Predictive Studies According to Paper Appearances

Indicator	High-level category	Appearances
Bet amount	Play	34
Net loss	Play	26
Active days number	Engagement	25
Bet number	Play	24
Age	Profile information	23
Gender	Profile information	21
Breadth of involvement	Engagement	20
Deposit amount	Payment	18
Bet variability	Play	17
Session length	Engagement	15
Deposit number	Payment	14
Bet intensity	Play	13
Wins amount	Play	12
Withdrawal amount	Payment	11
Withdrawal number	Payment	11
Bet trajectory	Play	10
Country or location	Profile information	10
Set limit	RG tool use	10
Time of day	Engagement	10
Session number	Engagement	9

Distribution of Indicators for Predictive Studies Across High-level Categories



We also constructed a scoring rubric.

Criterion	Scoring Approach
Study objective	Descriptive studies = 1; Predictive studies = 2 + scoring on all fields below
Outcome class	Validated screener = 4, Proxy of harm = 3, Group of thresholds = 2, Single behavior = 1
Indicator selection (prior to modeling)	Not stated/unclear/subjective = 0, Otherwise = 1
Indicator selection (during modeling)	Not stated/unclear/subjective = 0, Otherwise = 1
Algorithm/model selection method	Not stated/unclear/subjective = 0, Otherwise = 1
Metric coverage	Weak = 0, Moderate = 1, Strong = 2
Metric quality	Weak = 0, Moderate = 1, Strong = 2
Open science	0-1 practices = 0, 2-3 practices = 1, 4+ practices = 2
Peer-review	No = 0, Yes = 1

This allowed us to track the QUALITY of evidence for each indicator.

STUDY 2

The BRIDGE Score

We combined the level and quality of evidence to derive a “**BRIDGE SCORE**” for each indicator.

z -score calculated for each indicator and mapped onto a 0-10 scale, where 5.0 represents the average score across all indicators.

Scores above 5.0 reflect stronger or more consistently supported indicators, whereas scores below 5.0 reflect indicators that are either less common or backed by lower quality evidence

Top 10 Indicators according to the BRIDGE Score

Indicator	Category	Total Appearances	Average Study Quality	BRIDGE Score
Deposit max	Payment	7	13.0	6.5
Deposit amount	Payment	22	11.8	6.5
Deposit number	Payment	20	11.8	6.4
Withdrawal variability	Payment	7	12.6	6.3
Age	Profile information	31	11.4	6.3
Bonus amount	Play	7	12.4	6.2
Bet variability	Play	20	11.5	6.1
Withdrawal amount	Payment	12	11.7	6.0
Breadth of involvement	Engagement	27	11.3	6.0
Bonus number	Play	10	11.7	6.0

Bottom 10 Indicators according to the BRIDGE Score

Indicator	Category	Total Appearances	Average Study Quality	BRIDGE Score
Time of day	Engagement	16	10.2	4.7
Bet intensity	Play	22	10.2	4.7
Log in number	Engagement	3	9.3	4.5
Play break	RG tool use	2	9.0	4.5
Active days volatility	Engagement	3	9.1	4.4
Duration	Engagement	16	9.8	4.4
Losses	Play	9	9.5	4.3
Win rate	Play	7	8.7	3.9
Education	Profile information	1	1.0	2.8
Customer contact	Profile information	1	1.0	2.8

STUDY 2

The BRIDGE Database

KEY FINDINGS

- Play indicators were the most commonly used category across all studies, but did not rank highest in evidentiary strength.
- The Payment category received the highest average BRIDGE Scores, with 5 of the top 10 indicators related to financial transactions. Indicators such as deposit amount and number consistently appeared in high-quality predictive studies and demonstrated strong methodological support.
- RG tool use was the least studied indicator category. While many predictive studies used RG tools (e.g., self-exclusion) as outcome variables, few examined these tools as behavioral predictors of harm. This suggests a significant gap in the literature, particularly in evaluating how players' interactions with RG tools (e.g., time-outs, limit-setting) might serve as early indicators of risk rather than simply endpoints of distress.

Group	Indicator	BRIDGE Indicator or <i>Category</i>	BRIDGE Appearances	BRIDGE Study Quality	BRIDGE Score
Senet	Spend from norm	Bet variability	20	11.5	6.1
Senet	Frequency of play	Bet number	34	10.8	5.5
Senet	Late-night play	Time of day	16	10.2	4.7
Senet	Deposit frequency	Deposit number	20	11.8	6.4
Senet	Failed deposits	Deposit declines	13	10.4	5.0
Senet	Withdrawal reversals	Withdrawal canceled	9	10.7	5.2
Senet	Multiple payment methods	Deposit method	8	11.3	5.5
Senet	Credit cards	Deposit method	8	11.3	5.5
UKGC	Customer spend	Bet amount	52	10.8	5.6
UKGC	Patterns of spend	Bet trajectory	13	11.1	5.6
UKGC	Time spent gambling	Session length	18	11.1	5.6
UKGC	Gambling behavior indicators	<i>Play</i>	247	10.7	5.3
UKGC	Customer-led contact	Customer contact	1	1.0	2.8
UKGC	Use of gambling management tools	<i>RG tool use</i>	30	7.9	4.2
UKGC	Account indicators	<i>Payment</i>	154	11.2	5.5
Ksa	Intensity (losses)	Losses	9	9.5	4.3
Ksa	Intensity (number of playing days)	Active days number	42	11.0	5.9
Ksa	Intensity (sum of stakes)	Bet amount	52	10.8	5.6
Ksa	Loss of control	Loss chasing	13	11.3	5.7
Ksa	Increase in gambling over time	Bet trajectory	13	11.1	5.6
Ksa	Game types	Breadth of involvement	27	11.3	6.0
CEN	Losses	Losses	9	9.5	4.3
CEN	Changes in the use of RG tools	<i>RG tool use</i>	30	7.9	4.2
CEN	Gambling product preferences	Breadth of involvement	17	11.3	6.0
CEN	Time spent gambling	Session length	18	11.1	5.6
CEN	Customer-initiated contact	Customer contact	1	1.0	2.8
CEN	Canceled withdrawals	Withdrawal canceled	9	10.7	5.2
CEN	Depositing behavior	<i>Payment</i>	154 (3)	11.2	5.5
CEN	Speed of play	Bet intensity	22	10.2	4.7
CEN	Volume of stakes	Bet amount	52	10.8	5.6

STUDY 2

Recommendations

- Guidelines should prioritize evidence-based indicators.
- There is a need for standardized reporting guidelines.
- There is a need for open data and code.
- Address transparency challenges and evaluation of commercial solutions.

STUDY 3 - Financial Risk Identification

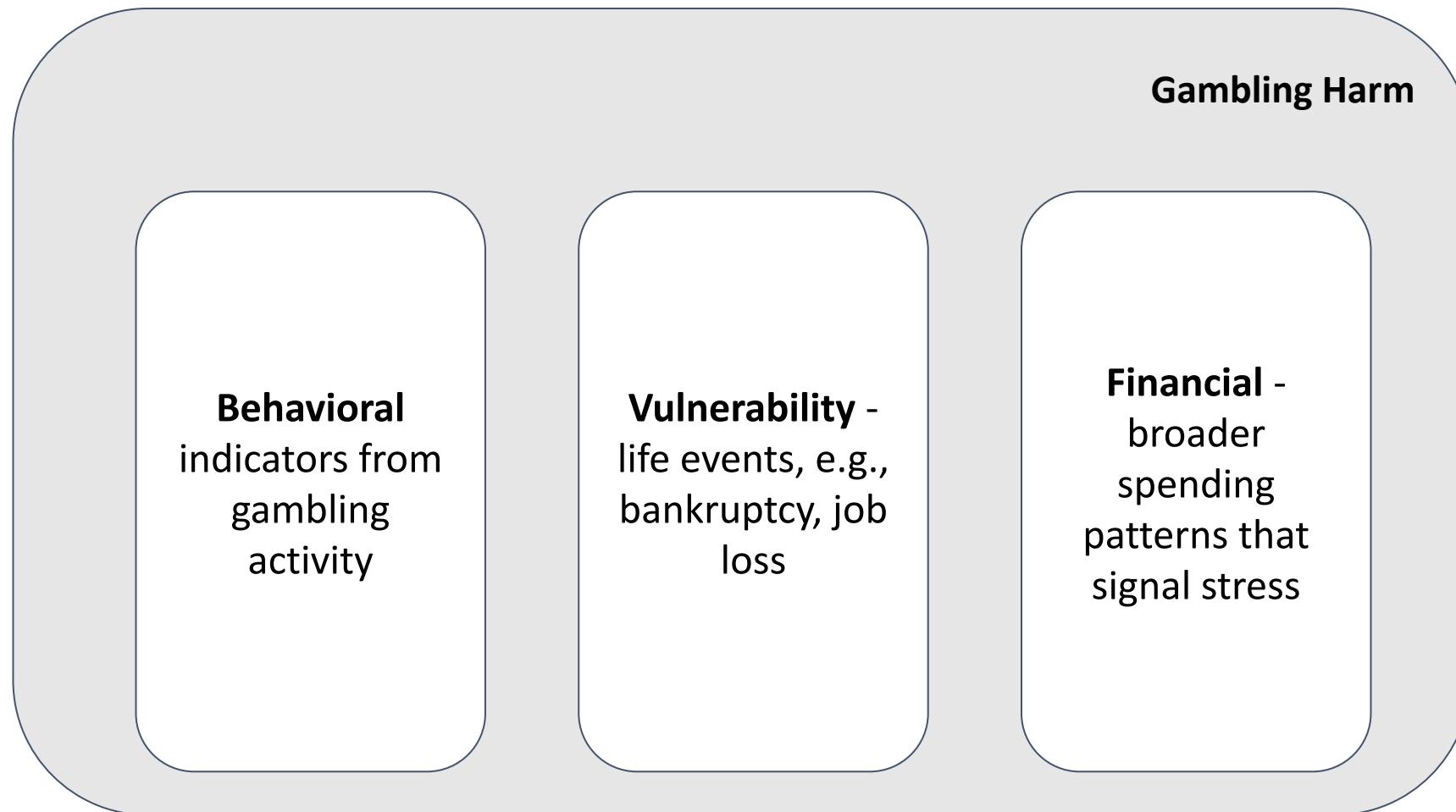
STUDY 3

In-depth expert interviews

Participant	Country	Role
1	UK	CEO and founder, gambling-specific open banking service company.
2	USA	CEO and founder, global self-exclusion program.
3	USA	Technical Lead, single digital wallet solution for online and land-based gambling platforms.
4	UK	Head of Product, open banking service company.
5	Sweden	Postdoctoral researcher studying financial harms in gambling using transaction data.
6	UK	Consultant, consulting firm working with gambling operators.
7	USA	Assistant Professor, university laboratory that examines behavioral addictions.
8	UK	Postdoctoral data scientist working with bank transaction data.

STUDY 3

Assessing Gambling Harm



STUDY 3

Key Findings

Conceptual Ambiguity: There is no universally agreed-upon definition of financial risk in gambling. Respondents indicated various approaches, ranging from simplistic loss-to-income ratios to more nuanced assessments of financial behaviors, highlighting ongoing challenges in operationalizing clear and effective risk criteria.

Technological Potential vs. Implementation Barriers: Advanced technologies such as open banking, credit reference agency data, and blockchain are currently available to support financial risk identification. However, practical challenges, including data classification difficulties, privacy concerns, consent issues, and uneven adoption rates, significantly constrain their current use.

STUDY 3

Key Findings

Cross-Operator Data Sharing: Single-player tracking across multiple operators remains a major challenge, complicated by fragmented data infrastructures, privacy concerns, and competitive market dynamics. Existing solutions, such as GamProtect in the UK and centralized systems in state monopolies, demonstrate feasibility but are limited in widespread application.

Regulatory Barriers: Regulators face significant technical, financial, and capacity challenges in implementing comprehensive risk identification frameworks, which complicate efforts to standardize and enforce effective player protection measures.

STUDY 3

Recommendations

- Establish a Clear Financial Risk Definition
- Explore Pilot Programs, e.g., UK Gambling Commission
- Facilitate Cross-Operator Tracking, e.g., UK's GamProtect
- Bolster Regulatory Data Infrastructure, e.g., ROGA data clearing house
- Assess Displacement Risks
- Explore Mandatory Carded-Play Systems

UNLV

INTERNATIONAL
GAMING INSTITUTE

Thank you!

Knowledge.

Research.

Innovation.



TO: Chair Maynard, Commissioners O'Brien, Hill, Skinner, and Brodeur

FROM Mark Vander Linden, Director of Research and Responsible Gaming

DATE: November 6, 2025

RE: Update of the AI workgroup

MGC AI Workgroup members

Commissioner O'Brien,
Carrie Torrisi, Chief, Sports Wagering Division
Justin Stempeck, Interim General Counsel
Kevin Gauvreau, Interim Director, Information Technology Division
Andrew Steffen, Compliance and Operations Manager, Sports Wagering Division
Tom Lam, Compliance and Operations Manager, Sports Wagering Division
Bonnie Andrews, Deputy Director, Research and Responsible Gaming Division
Mark Vander Linden, Director, Research and Responsible Gaming Division

The MGC AI workgroup has been briefed on the following items, and we're monitoring changes and updates.

New Jersey Division of Gaming Enforcement Responsible Gaming Best Practices [ResponsibleGamingBestPractices.pdf](#)

The DGE's Responsible Gaming Best Practices, introduced in 2023, have been updated and are being considered for regulation. The Best Practices include requiring that each online operator designate one or more responsible gaming leads to identify and monitor at-risk patrons, as well as establishing a hard list of 10 triggers for determining problem gambling trend in players and wagering accounts.



Massachusetts Gaming Commission

International Association of Gaming Standards Ethical Use of Artificial Intelligence Best Practices.

[20250717 AI Best Practices FINAL \(Word Document\)](#)

The International Association of Gaming Standards developed a set of standards that regulatory authorities could use as a basis for the creation of guard rails that prevent AI technology from being misused while benefiting from its positive value. The standards linked in this document were last updated in July 2025.

Study on AI and Player Risk Identification and Response

Included in the MGC's FY25 annual research agenda was a study exploring potential uses of AI technology to identify patterns of risky gambling behavior. On July 1, 2024, the MGC awarded a contract to the UNLV International Gaming Institute. Led by Dr. Kasra Ghaharian, the study examines the current and potential uses of artificial intelligence in gaming, including the assessment of the quality and strength of evidence to detect the risk of harm using various aspects of player behavior, and exploration of the use of financial data to detect player risk. The final report will be shared with the commission at the November 6, 2025 meeting.

Sports Wagering Operator Updates

In April and May, 2025, sports wagering operators met individually with members of the AI workgroup to provide an update on measures taken to identify potentially risky patterns of gambling activity. These updates support the reporting requirements detailed in CMR 205.257.02(4). This regulation requires sports wagering operators to collect information to analyze patron behavior for the purpose of identifying and developing programs and interventions to promote responsible gaming and support problem gamblers. Sports Wagering Operators are required to provide a report to the Commission biannually.



Massachusetts Gaming Commission

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



PLAINRIDGE PARK

Q3 2025 REPORT



RETAIL SPORTS WAGERING REVENUE AND TAXES

Year	Quarter	Net Sports Wagering Revenue	Sports Wagering Taxes
2024	Q1	\$1,026,537	\$153,981
	Q2	\$84,399	\$40,705
	Q3	\$938,110	\$140,717
	Q4	\$198,812	\$60,055
	Total	\$2,247,858	\$395,458
2025	Q1	\$575,358	\$86,304
	Q2	\$641,653	\$96,248
	Q3	\$705,081	\$105,762
	Q4		
	Total	\$1,922,092	\$288,314

In addition to the Retail Sportsbook, Plainridge Park has 20 sports wagering kiosks.

GAMING REVENUE AND TAXES

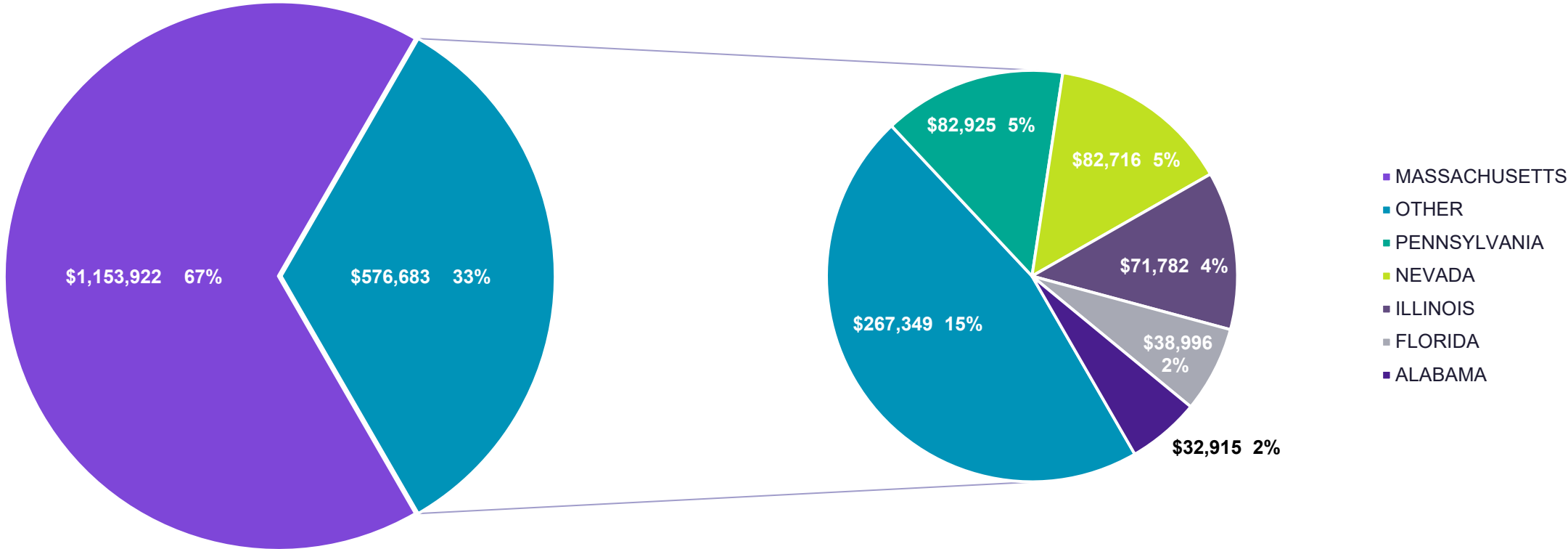
Year	Quarter	Net Slot Revenue	State Taxes	Race Horse Taxes	Total Taxes
2024	Q1	\$40,478,391	\$16,191,357	\$3,643,055	\$19,834,412
	Q2	\$42,015,386	\$16,806,154	\$3,781,385	\$20,587,539
	Q3	\$42,539,918	\$17,015,967	\$3,828,593	\$20,844,560
	Q4	\$43,493,668	\$17,397,467	\$3,914,430	\$21,311,898
	Total	\$168,527,363	\$67,410,945	\$15,167,463	\$82,578,409
2025	Q1	\$43,494,439	\$17,397,776	\$3,914,500	\$21,312,275
	Q2	\$46,342,475	\$18,536,990	\$4,170,823	\$22,707,813
	Q3	\$44,716,034	\$17,886,414	\$4,024,443	\$21,910,857
	Q4				
	Total	\$134,552,948	\$53,821,180	\$12,109,766	\$65,930,945

LOTTERY SALES

Quarter	2025	2024	\$ Difference	% Difference
Q1	\$644,925	\$618,943	\$25,982	4.20%
Q2	\$615,801	\$628,352	(\$12,551)	-2.00%
Q3	\$666,543	\$611,190	\$55,354	9.06%
Q4				
Total	\$1,927,269	\$1,858,485	\$68,785	3.70%

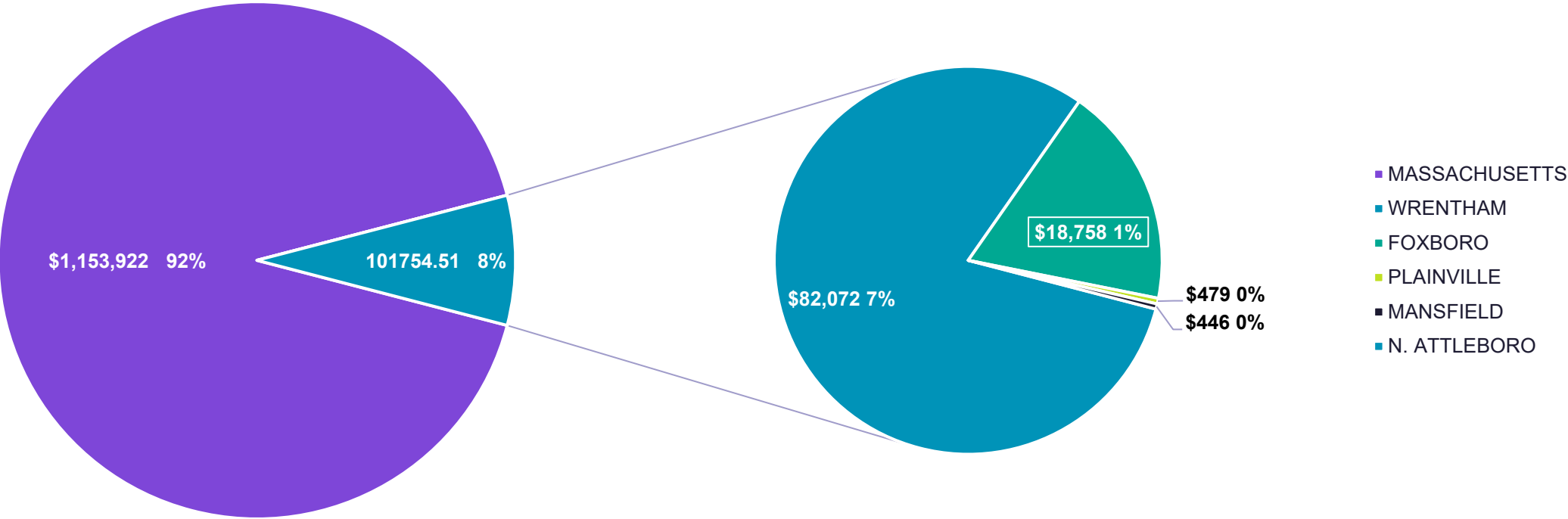
SPEND BY STATE

Q3 2025 Total Qualified Spend By State



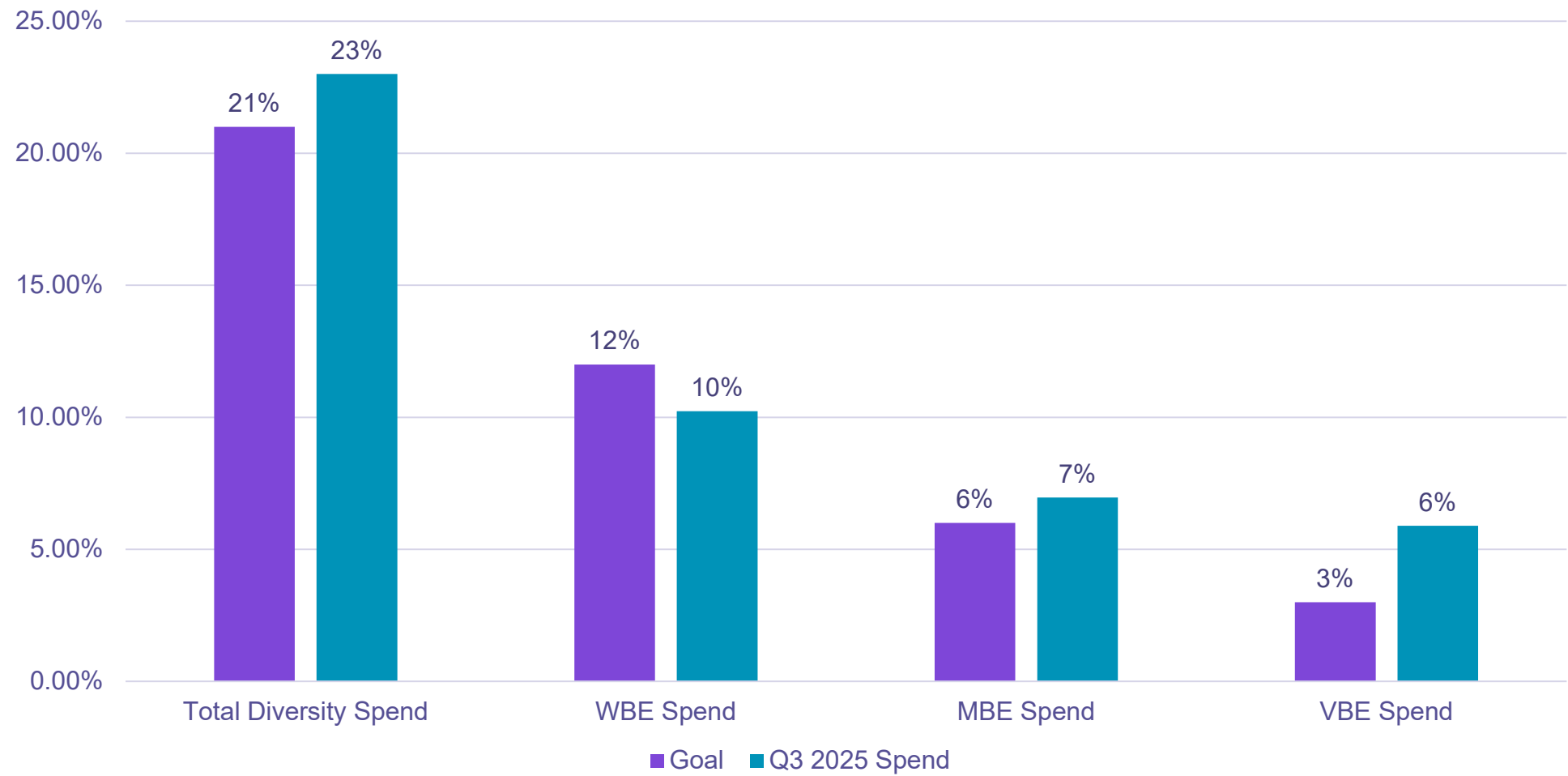
LOCAL SPEND

Q3 2025 Massachusetts vs Host & Surrounding Community Qualified Spend



VENDOR DIVERSITY

Q3 2025 vs Goal



DIVERSE SPEND

Category ¹	Q3 2025	Q2 2025	\$ Difference	% Difference
WBE	\$177,030	\$190,128	(\$13,098)	(6.88%)
MBE	\$120,533	\$85,044	\$35,489	41.73%
VBE	\$101,985	\$87,642	\$14,343	16.37%
Total Diverse Spend	\$399,547	\$362,815	\$36,732	10.12%
Qualified Spend	\$1,730,605	\$1,523,174	\$207,431	13.62%

¹ Includes vendors that are certified in multiple diversity categories. Spend is reported in all qualified categories.

COMPLIANCE

Month	Prevented from Entering Gaming Establishment			Expired, Invalid, No ID	Fake ID	Weapons Detected	Minors & Underage Escorted from the Gaming Area	Minors & Underage found Gaming at Slot Machines	Minors & Underage Escorted from the Sports Wagering	Minors & Underage found Sports Wagering	Minors & Underage Consuming Alcoholic Beverages
	Total	Minors ¹	Underage ²								
July	58	11	21	24	0	2	0	0	0	0	0
August	26	11	17	28	0	0	0	0	0	0	0
September	47	4	12	30	0	1	0	0	0	0	0
Total	161	26	50	82	0	3	0	0	0	0	0

¹ Person under 18 years of age

² Person 18-21 years of age



EMPLOYMENT¹: ALL EMPLOYEES²

Employee Category	Percentage Goal	Total # of Employees in Category	Q3-25 Actual Percentage of Total Employees	Q2-25 Actual Percentage of Total Employees
Diversity	15%	148	33%	32%
Veterans	2%	15	3%	4%
Women	50%	213	48%	45%
Local ³	35%	129	29%	31%
MA Employees		251	57%	58%

¹ All employees referenced in this slide were current as of Q3 2025

² Total number of employees Q3 2025: 444

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

	Employees	Full-Time	Part-Time	Seasonal
Total	444	275	169	0
% of Total	100%	62%	38%	0%

EMPLOYMENT¹: SPORTSBOOK²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	2	13%
Veterans	0	0%
Women	5	33%
Local ³	4	27%
Full-Time	10	67%

¹ All employees referenced in this slide were current as of Q3 2025

² Total number of **Sportsbook employees (does not include Sports restaurant employees)** Q3 2025: 15

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

EMPLOYMENT¹: SUPERVISOR AND ABOVE²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	13	17%
Veterans	3	4%
Women	25	33%

¹ All employees referenced in this slide were current as of Q3 2025

² Total number of Supervisor and Above Q3 2025: 76



PPC CARES

OUR DEVELOPMENT - Q3, 2025



PENN: LEADERSHIP DEVELOPMENT RETREAT



PPC: CPR TRAINING



PPC: INTERNSHIP PROGRAM



PPC: KAIZEN-GEMBA



CREATING OUTSTANDING LEADERS

To invest in the professional and personal development of TEAM MEMBERS by providing exposure to diverse perspectives and experiences, fostering growth and purpose-driven leadership, and promoting self-esteem and confidence in our team members.

MA Con



PPC: BU CAREER FAIR



PPC: ACES OF PENN

 Q3 2025	 Kristina Fournier HR Generalist	Keep up the good work! "She is such a team player and is ready always to go above and beyond everytime she walks through the doors."	 Sugein Medero Torres Above & Beyond EVS Attendant
 Gregory Pazurchek Security Officer	A true rockstar! "Ewelina is polite and professional with our Slack games. Thank you for all you do to help the F&S teams."	 Ewelina Smusz Guest Service / Above & Beyond Slack's Hostess	Always so helpful! "Your work ethic is unmatched! You are an extremely valuable asset to our team, whether you're working on a busy weekend, preparing banks for the week, or covering in to cover extra hours!" Wing Ye Above & Beyond Player Services Main Bank

ACES OF PENN: TEAM MEMBERS OF THE QUARTER



PPC CARES

OUR TEAM - Q3 2025



ENGAGED TEAM MEMBERS

To provide training, work environments, events, activities for TEAM MEMBERS to stay motivated, creative, and work well together to achieve shared goals. Our leaders should inspire team members that are eager to learn and grow, and feel valued for their feedback.



PPC: NATIONAL BREAKFAST MONTH



PPC: NATIONAL BREAKFAST MONTH



PPC: NATIONAL BREAKFAST MONTH



PPC: 10 YEAR ANNIVERSARY



PPC: 10 YEAR ANNIVERSARY



PPC INTERNS: DEPARTMENT WARS



PPC: DEPARTMENT WARS



PPC: TOWN HALL



PPC CARES

OUR COMMUNITY - Q3 2025



PARTNERING SUCCESS

Working collaboratively with our community partners and TEAM MEMBERS to help mobilize resources and influence systems. Our team members will dedicate resources such as time, funding, and people with the necessary skills to enhance the mission of our community partners.



ACS: PATIO PARTY



AMERICAN RED CROSS: AWARENESS



PLAINVILLE FIRE: FLAG REPAIR



AMERICAN CANCER SOCIETY: MEN WEAR PINK

MEN WEAR PINK: A SULKY SOCIAL
SEPTEMBER 1
1PM-6PM
Plainridge Park Casino



ACS: MEN WEAR PINK



ACS: MEN WEAR PINK



AMERICAN RED CROSS: BLOOD DRIVE



ACS: SULKY SOCIAL



ACS: PATIO PARTY



ACS: SULKY SOCIAL



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

FROM: Joseph E. Delaney and Mary Thurlow

CC: Dean Serpa, Executive Director, Justin Stempeck, Interim General Counsel

DATE: October 30, 2025

RE: Attleboro Re-allocation of Unexpended 2018 CMF Grant Funds

MGC received a request from Attleboro to re-allocate its unexpended 2018 Transportation Planning Grant funds in the amount of \$66,388. This amount exceeds 10% of the original grant amount, therefore it needs to come before the Commission for approval.

Background

Each qualified community received a Reserve Grant of \$100,000 to mitigate impacts created by the casinos. Attleboro received its Reserve in the form of a Transportation Planning Grant for a traffic study of Route 1, 1A and Route 123 to identify potential casino related impacts. This grant was set to expire in 2022; however, an extension was timely filed to extend this grant until June 30, 2026.

This traffic study, along with other work done by Southeastern Regional Planning & Economic Development District (SRPEDD) did not identify any direct traffic related impacts of the casino on these corridors that required additional mitigation. Therefore, the City is looking to repurpose the remaining \$66,388 in funds.

The City is proposing to use these funds to plant trees along the major routes to the casino which include Route 123 and Route 152. This project would plant 39 trees and is part of larger project that will plant a total of 200 trees around the community. Tree planting has demonstrated environmental benefits such as CO2 reduction, improved air quality and reduction of heat island effects, as well as providing aesthetic improvements to the roadways.

Staff Recommendation

Staff recommends re-purposing \$66,388 of Reserve Funds for the tree planting program. This request is very similar to the 2023 Saugus Grant which sought to provide shade, improve air quality and diminish the urban heat island created by Route 1. This project should help mitigate increased vehicular pollution associated with casino traffic.



Massachusetts Gaming Commission



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

FROM: Joseph E. Delaney and Mary Thurlow

CC: Dean Serpa, Executive Director, Justin Stempeck, Interim General Counsel

DATE: October 30, 2025

RE: Longmeadow Re-allocation of Unexpended 2022 CMF Grant Funds

MGC received a request from Longmeadow to re-allocate its unexpended 2022 Public Safety training funds in the amount of \$21,385. This amount exceeds 10% of the original grant amount, therefore it needs to come before the Commission for approval.

Background

In 2022 Longmeadow was awarded a public safety grant in the amount of \$85,900 to install traffic cameras and conduct police training. The Town completed the camera installation and the de-escalation and implicit bias training identified in the grant application. The Town was able to save money on the training item by scheduling the trainings when they would not have to pay overtime, resulting in \$21,385 of unexpended funds.

Longmeadow would like to use these remaining funds to provide overtime coverage for Advance Law Enforcement Rapid Response Training (ALERRT) training. This will be a joint initiative with the Fire Department.

Staff Recommendation

Staff recommends re-purposing \$21,385 of training funds from the 2022 CMF Grant for ALERRT training. In the last couple of grant rounds, the CMF has funded ALERRT training in several communities. This allows police and fire departments to better coordinate their activities and provide a safer environment during emergency responses.



Massachusetts Gaming Commission



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

FROM: Joseph E. Delaney and Mary Thurlow

CC: Dean Serpa, Executive Director, Justin Stempeck, Interim General Counsel

DATE: October 30, 2025

RE: Wilbraham Re-allocation of Unexpended 2023 CMF Grant Funds

MGC received a request from Wilbraham to re-allocate the unexpended funds in its 2023 Public Safety Grant in the amount of \$16,693.70. This amount exceeds 10% of the original grant amount, therefore it needs to come before the Commission for approval.

Background

In 2023 Wilbraham was awarded a public safety grant in the amount of \$42,764 for the upgrade of radio software to improve interoperability. This project has been completed and came in under budget resulting in \$16,693.70 of unexpended funds.

In FY 2025, Wilbraham was awarded \$42,408 for the purchase and installation of license plate readers. This project recently went out to bid and the total price for the work came in significantly higher than the estimate at \$74,147. Wilbraham is asking that the unexpended funds from the 2023 grant be applied towards the FY 2025 Grant. This still will leave a funding shortfall, but the Town has identified another source of funds that will make the project whole.

Staff Recommendation

Staff understand that many times original quotes and actual quotes can vary significantly when it comes to this type of technology. Additionally, this would enable Wilbraham to close out the Calendar year 2023 grant. Therefore, staff recommends allowing the Town of Wilbraham to use \$16,693.70 from the 2023 CMF Grant towards the purchase of license plate readers funded through the FY 2025 CMF Grant. If approved MGC Staff will prepare amended State Contracts for 2023 and 2025.



Massachusetts Gaming Commission



Community Mitigation Fund FY 2027 Program Guidelines

Approved by the Massachusetts Gaming Commission on November 6, 2025

FY 2027 Community Mitigation Fund Guidelines

Welcome to the FY 2027 Community Mitigation Fund (CMF) Guidelines.

The Massachusetts Gaming Commission created a grant structure that provides municipalities with certainty regarding the availability of mitigation funds and assists them in funding actionable, mitigation-based projects tailored to their community.

FISCAL YEAR 2027

For FY 2027 there are no significant changes to FY 2026 Guidelines.

For a second year, the State Legislature diverted the expected Community Mitigation Funds for other uses. There are currently sufficient funds available to operate this program at a significantly reduced level from last year. The total amount of funding available is \$5.0 million compared to \$19.5 million in FY 2026. Considering this significant reduction in funding, the Commission reserves the right to prioritize applications and determine which requests to fund based on its assessment of a broad range of factors including the extent of the public benefit each grant is likely to produce. The Commission also reserves the ability to fund only portions of requested projects or to fund only a percentage of amounts requested.

The following are the grant applications that will be accepted in FY 2027:

- Municipal Block Grant Program – All eligible communities will file applications under this program. Municipalities are required to submit a single application that includes all the proposed projects for that community.
- Regional Agency Grant Program – This application is for the workforce grants, regional planning agency grants, regional public safety grants and other grants that may be filed by eligible regional entities.

Applications are due to the Commission by **January 31, 2026, at 11:59 PM**. The application must describe how the municipality will spend the proposed grant amount in accordance with the program guidelines. **Submissions must be sent via e-mail to MGCCMF@massgaming.gov. If a municipality does not apply by January 31, that municipality will forfeit the funds for that year.**

CMF Applicants are encouraged to contact the Commission's staff with any questions or concerns.

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1.0 COMMUNITY MITIGATION FUND GRANT PROGRAM

The Expanded Gaming Act created the Community Mitigation Fund to help communities and other entities offset costs related to the construction and operation of a gaming establishment.

Applications for the Fiscal Year 2027 grant round are due **January 31, 2026**. The Massachusetts Gaming Commission anticipates making funding decisions on any requests for grant assistance before July 2026.

For FY 2027, there are two types of grants programs within the CMF:

- The Municipal Block Grant Program
- The Regional Agency Grant Program

The Municipal Block Grant Program will provide funds for eligible municipalities to mitigate casino-related impacts, and the Regional Agency Grant Program will fund projects to be carried out by regional agencies in workforce development, public safety, and regional planning.

1.1 Program Eligibility

The Commission's regulations identify a range of eligible entities including, but not limited to:

- The host communities and surrounding communities; communities that entered into a nearby community agreement; any communities that petitioned to be a surrounding community; and any communities that are geographically adjacent to a host community;
- Water and sewer districts in the vicinity of a gaming establishment;
- Local and regional agencies involved in education, transportation, infrastructure, housing and environmental issues; governmental entities within communities such as redevelopment authorities or non-regional school districts must submit applications through a municipal administrator in its service area; and
- The county district attorney, police, fire, and emergency services.

Any governmental entity seeking funding for mitigation is required to ensure that any planned use of funding complies with all applicable laws and regulations, as well as provisions of the Massachusetts Constitution. This includes but is not limited to, the Anti-Aid Amendment of the Massachusetts Constitution.

The Anti-Aid Amendment of the Massachusetts Constitution prohibits the use of public money, which includes state-appropriated funds such as those that comprise the Community Mitigation Funds, for the purpose of solely benefiting or aiding a private party. Private non-governmental parties may not apply for Community Mitigation Funds. Governmental entities may apply to the Commission for funds to mitigate casino-related impacts, provided that the funding is used for a "public purpose" and not for the direct benefit or maintenance of a private party. In some instances, the intended use of funds may result in both a public and a private benefit. In such cases, the use may be permitted in accordance with the Anti-Aid Amendment if the private benefit is not the primary benefit and is only incidental to the public purpose.

If you are unsure of your agency's eligibility, please contact program staff in advance of submitting your application.

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1.2 Ineligible Expenses for all Grants

The CMF will not fund the mitigation of impacts already being addressed by a Host or Surrounding Community Agreement. All applications must demonstrate that CMF funds will supplement and not supplant historical operations funding.

FY 2027 grant funds may not be used for the mitigation of:

- Impacts that are projected or predicted but that are not occurring or have not occurred by January 31, 2026;
- Impacts that are the responsibility (e.g. contractual, statutory, regulatory) of parties involved in the construction and operation of gaming establishments; and
- Other impacts determined annually by the Commission.

1.3 Application Requirements

The following requirements are applicable for all grants. Please see the individual grant guidelines for specific instructions regarding each type of grant.

- Applicants are required to fully complete the grant application appropriate to their type of grant.
- All applications must identify an impact associated with the casino and describe how the project will address the impact.
- All applications must submit a detailed scope of work and timeline for implementation of the project identified in the application.
- All applications must contain appropriate backup materials that support the application.
- **All applications must be submitted by 11:59 PM January 31, 2026. Submissions must be sent via e-mail to MGCCMF@massgaming.gov. Any application received after the deadline will not be considered for funding in FY 2027.**

1.4 Funding Allocation

The total available funding to the CMF for FY 2027 is \$5.0 million. This amounts to 25.64% of the funds programmed for FY 2026. The Commission decided to maintain the eligibility of all communities that were eligible in FY 2026. For FY 2027, each community's proposed grant allocation will be 25.64% of last year's proposed grant amounts.

For FY 2027, the following allocations are proposed for the municipal grants and the Regional Agency Grants:

- Region A \$2,949,100
- Category 2 \$ 128,300
- Region B \$1,102,800
- Regional Agencies \$ 819,800

Considering this significant reduction in funding, the Commission reserves the right to prioritize applications and determine which requests to fund based on its assessment of a broad range of factors including the extent of the public benefit each grant is likely to produce. The Commission also reserves the ability to fund only portions of requested projects or to fund only a percentage of amounts requested.

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2.0 MUNICIPAL BLOCK GRANT PROGRAM

The Municipal Block Grant Program is designed to give municipalities in the vicinity of the gaming establishments some certainty regarding the availability of mitigation funds to their communities. FY 2027 proposed grant amounts do not constitute a guarantee of funding. While the proposed grant amounts are calculated in advance, actual grant awards will be based on the documented nexus to casino related impacts and the ability of the projects to address those impacts.

2.1 Program Eligibility

The Municipal Block Grant Program will include all eligible municipalities. Eligible municipalities are:

- **Region A** - Everett, Boston, Cambridge, Chelsea, Lynn, Malden, Medford, Melrose, Revere, Somerville, and Saugus
- **Category 2** – Attleboro, Foxborough, Mansfield, North Attleborough, Plainville, and Wrentham
- **Region B** - Springfield, Agawam, Chicopee, Holyoke, East Longmeadow, Hampden, Longmeadow, Ludlow, Northampton, West Springfield, and Wilbraham

2.2 Key Programmatic Aspects

The Municipal Block Grant will fund projects in several categories – Community Planning, Transportation, Public Safety, Gambling Harm Reduction, and Specific Impact. These categories are further described in Section 2.6 of the Guidelines. The following are some of the key aspects of the program:

- The proposed grant amount for each eligible municipality is based on a distribution formula.
- For each category of grant, the Commission has identified impacts that are likely to be caused by, or associated with, the gaming establishments. For these identified impacts, applicants may reference them in their applications.
- For each category of grant, the Commission has identified the types of projects that are generally acceptable to address casino related impacts.
- For each category of grant, the Commission has identified ineligible projects or items.

2.3 Proposed Municipal Grant Amounts

The proposed grant amounts for FY 2027 can be found on **ATTACHMENT-A**. These amounts are approximately 26% of the allocation amount from last year. Proposed grant amounts were voted by the Commission on November 6, 2025.

2.4 Application Requirements

Grant applications are due to the Commission by 11:59 PM on January 31, 2026, via e-mail at MGCCMF@massgaming.gov or as a response to COMMBUYS BID Number: BD26-1068-1068C-1068L-121911. **Applications received after this time will not be considered for funding. Each municipality must submit only one application for the entire municipality. Applications should include the following elements.**

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Please click here: www.massgaming.com/about/community-mitigation-fund/forms/ for the application forms and an example application.

- a. Applicants are required to fully complete the CMF Municipal Block Grant Application and select the appropriate categories for their proposed projects.
- b. Applicants must identify an impact associated with the casino, describe how the project will address it, and provide justification for any funds requested.
- c. The municipality must submit a separate section for each project within a grant category detailing the scope, schedule, and budget in accordance with the Guidelines. Applicants must submit additional supporting materials. These combined forms and attachments will make up each municipality's complete application.
- d. If a municipality cannot identify sufficient projects that will expend the entire proposed grant amount, a municipality may apply for a lower amount of funding. Any unused funding for that fiscal year will be forfeited by the municipality.

2.5 Waivers

The Commission may, in its discretion, waive or grant a variance from any provision or requirement contained in these Guidelines. Any requests for waivers shall be submitted with the Grant Application. Please click here for the waiver form: www.massgaming.com/about/community-mitigation-fund/forms/.

Funding Waiver - If any applicant determines that the proposed grant amount is insufficient to mitigate identified casino-related impacts, it may request a waiver for those specific projects that cause the municipality to exceed the proposed grant amount. The intent of this waiver is not to fund routine expenses but rather to fund significant projects that would not otherwise be able to be funded under an applicant's annual CMF allocation. **The availability of funds for a waiver in FY 2027 are expected to be minimal. All available funds are being programmed for municipalities or regional agencies. The only funds that could be available for a waiver would be if a community or regional agency does not apply for funds, or the Commission determines that any projects are ineligible for funding. Applicants should not rely on waivers for funding projects.**

Please see Section 5.5 of these Guidelines for additional information about waivers.

2.6 Grant Categories

The Commission has identified five categories under which a municipality may apply for funding. All applicants should make sure they are aware of each category's distinct requirements and that they apply under the relevant category. Projects that the Commission determines are incorrectly filed may be recategorized by staff.

Community Planning

The Community Planning grant category is designed to help municipalities either address the negative impacts of the gaming establishment on the local community or take advantage of opportunities that the gaming establishment presents. Community Planning projects must have a

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defined area or issue that will be investigated, as well as a clear plan for implementation of the results.

Community Planning projects must address an identified casino-related impact. Grant funds may be used for both project planning and project implementation. Past projects have included the development of marketing and tourism plans, design and implementation of websites highlighting local businesses, wayfinding projects, re-zoning studies, and projects to improve the local economic capacity.

Applicants should consult with the Regional Planning Agency (RPA) or nearby communities to determine the potential for cooperative regional efforts regarding planning activities. Details of these consultations should be provided in the application.

A project may identify the addition of staff to implement the project. The Commission will fund the portion of the staff member's salary that is directly related to the implementation of the mitigation efforts. The municipality would need to provide the remaining amount of any employee cost and certify that all such expenses are casino related. The Commission will not cover fringe benefits under this category.

The application should include sufficient backup information for the Review Team to fully understand the project(s). This information could include locus maps, requests for proposals, detailed scopes of work, drawings etc. Please see the application form for additional information.

Identified Impacts: The Commission has identified impacts associated with the gaming establishment, which municipalities may cite in their application. There may be other impacts that have not been identified by the Commission that could be eligible for grant funds. If a municipality has identified an additional impact to be addressed, the application must identify the impact and provide sufficient evidence that the impact is caused by, or is associated with, a gaming establishment.

Positive Impacts

- Gaming establishments attract a large group of patrons and employees to their establishments that would not otherwise be present in the area. This provides opportunities for local communities and businesses to attract these patrons and employees to their communities and business establishments.
- Gaming establishments typically purchase millions of dollars of goods and services each year, much of which is purchased locally. This provides the opportunity for local businesses to provide these goods and services.
- Gaming establishments require a significant number of workers, which provide employment opportunities for local residents.

Negative Impacts

- Competition from the gaming establishment may have negative impacts on other businesses competing in the hospitality and entertainment industries.
- The presence of a gaming establishment may result in reallocated spending. Reallocated spending is spending on goods and services which would have occurred had the casinos never opened, but which did not occur because an individual chose to spend their money at the casino instead. The main areas where monies are reallocated are transportation, retail

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items, hotels and travel, restaurants and bars, recreation, non-live entertainment, and live entertainment.

- The marketing capabilities of the gaming establishments may put other competing local businesses at a disadvantage.

Eligible Community Planning and Implementation Projects – The following types of projects may be considered to address casino related impacts:

- Marketing and tourism plans to attract casino patrons and employees to the municipality, highlight local businesses, promote recreational and entertainment opportunities, and help communities compete with the gaming establishments for business.
- Projects to provide economic development opportunities for local businesses. Projects of this nature should be community-run efforts that have the potential to improve the competitiveness of local businesses as a whole. These projects must provide a public benefit and not provide a direct benefit to private entities.
- Programs to increase business opportunities to provide goods and services to the gaming establishments.
- Other programs that encourage casino employees to live/work/play in the community.

Ineligible Projects – The following types of projects have been deemed ineligible for grant funding:

- Projects that do not address a casino-related impact.
- Projects that primarily provide a direct benefit to or maintenance of a private party.

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Transportation

The Transportation grant category is designed to help municipalities deal with the transportation-related impacts that a gaming establishment may have on all modes of transportation including vehicular travel, public transit, and pedestrian/bicycle travel. This category includes both the planning for transportation improvements and the construction of identified transportation improvement projects.

Transportation Planning and Construction projects for road and intersection improvements will only be funded on routes that have been identified in the Environmental Impact Report for the gaming establishment as carrying at least 1 percent of the casino-related traffic. The Commission may consider other roadway sections if the applicant can affirmatively demonstrate that the road section is significantly impacted by casino-related traffic. Acceptable documentation could include traffic studies done by Regional Planning Agencies or private developers that could reasonably conclude that approximately 1% of the casino-related traffic is using the identified road/intersection. Please see **ATTACHMENT B** for the trip distribution maps for the gaming establishments.

Projects on state-owned roadways are not generally eligible for Community Mitigation Funds. If a community is looking for funds to perform planning on a state-owned roadway, please contact CMF Staff to discuss possible eligibility in advance of submitting the application.

For projects proposing the planning or construction of multi-use paths, the applicant must demonstrate that the proposed project is part of a larger network of paths that provide direct access to a gaming establishment.

Transportation Planning Projects: Transportation planning projects must address an identified casino impact. Transportation planning projects must have a defined area or issue that will be investigated as well as a clear plan for implementation of the results. Transportation planning grants are intended to assist communities with gathering data and analysis, hiring planning consultants, performing engineering review/surveys, conducting public meetings, preparing final reports, and preparing analysis or design.

For any proposed transit improvement studies, the municipality must consult with the Regional Transit Authority where the gaming establishment is located and must have support from that agency before proceeding with the project.

Applicants may, but are not required to, include a description of how the project meets the evaluation standards for the Fiscal Year 2026 TIP criteria for the Boston MPO Region or the Pioneer Valley Planning Commission's transportation evaluation criteria, or other regional transportation project evaluation standard, whichever may be most applicable.

Applicants are strongly encouraged to include a letter of support from MassDOT with any application.

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The application should include sufficient backup information for the Review Team to fully understand the project(s). This information could include locus maps, requests for proposals, detailed scopes of work, etc. Please see the application form for additional information.

Transportation Construction Projects: Transportation construction projects must address an identified casino impact. Grant funds will provide 100% of the combined total costs of all construction projects up to \$250,000 and will fund up to 30% of the costs associated with an individual project in excess of \$250,000 up to a maximum grant of \$1.5 million.

Example 1 – A community has a transportation construction project that is estimated to cost \$3 million. The subsidy for this project would be the first \$250,000 of the project at 100% and 30% of the remaining cost, or $\$2,750,000 \times 0.30 = \$825,000$. The total subsidy for the project would then be $\$250,000 + \$825,000 = \$1,075,000$.

Example 2 – A community has two construction projects: the construction of a bike share network that costs \$125,000 and an intersection improvement project that costs \$800,000. The combined costs of these projects are \$925,000. The breakdown would be as follows: \$250,000 would be spent across the two projects, the first \$125,000 on the bike share and the remaining \$125,000 towards the intersection improvements. This would leave a remainder of \$675,000 on the intersection project. Of that \$675,000, CMF would cover 30% or $\$675,000 \times 0.30 = \$202,500$. Therefore, the total award for the two projects would be $\$250,000 + \$202,500 = \$452,500$.

Applicants must demonstrate that the project will begin construction no later than June 30, 2027.

Identified Impacts: The Commission has identified transportation-related impacts associated with the gaming establishments, which municipalities may cite in their applications. There may be other impacts that have not been identified by the Commission that may be eligible for grant funds. If a municipality has identified additional impacts to be addressed, the applications must identify the impact and provide sufficient evidence that the impact is caused or is associated with a gaming establishment.

- Increased traffic associated with the gaming establishment may cause increased congestion on the major routes leading to/from the gaming establishment.
- Increased traffic associated with the gaming establishment may result in increased vehicular accidents on major routes leading to/from the gaming establishment.
- Increased traffic associated with the gaming establishment may result in increased vehicular/bicycle/pedestrian conflicts.
- Increased traffic associated with the gaming establishment may cause localized increases in air pollution due to congestion.
- Increased visitation to the gaming establishment area may place a strain on public transit services.

Eligible Transportation Planning Projects – Eligible transportation planning projects could include:

- Road safety audits
- Complete Streets evaluations and designs
- Studies to improve public transit
- Multi-use path planning and design
- Road/traffic signal improvement designs to improve vehicular safety and/or reduce traffic congestion

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- Planning for bike share networks
- Studies to identify air pollution reduction strategies
- Studies to identify ways to reduce single occupancy vehicles

Eligible Transportation Construction Projects

- Construction of multi-use paths
- Construction of identified road safety improvements
- Construction of identified roadway capacity enhancements
- Purchase and installation of bike share networks
- Construction of transit improvements
- Construction of traffic signal improvements to enhance roadway capacity and/or improve vehicle and pedestrian safety
- Other transportation-related construction projects that can be demonstrated to address an impact of a gaming establishment.

Ineligible Projects

- Routine road paving projects that do not include capacity enhancements or safety improvements.
- Projects only associated with aesthetic improvements.
- Operational costs associated with traffic safety (e.g., police costs for traffic enforcement, costs of traffic control equipment such as speed boards, etc.). Applicants should apply for these funds under public safety.
- Projects that do not address a casino-related impact.

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Public Safety

Public safety grants are intended to assist municipalities in addressing the increased public safety operational costs associated with the introduction of a gaming establishment in the region. Eligible entities include Police, Fire, EMS, and other public safety agencies. Any proposed project under this section must be done in response to a casino-related impact. All applications for public safety personnel or other public safety operational costs, including relevant training, must demonstrate that CMF funds will supplement and not supplant historical operations funding.

Applicants that are applying for radio or other communication equipment that engages with the statewide interoperability system must submit the ICIP (Interoperable Communications Investment Proposal) form and Special Conditions Form directly to the Executive Office of Public Safety and Security (EOPSS). The applicant shall submit a copy of their forms with their public safety application. The applicant shall send the approved ICIP and Special Conditions Forms to MGCCMF@Massgaming.gov when they receive an approved copy back from EOPSS.

Applicants must include detailed hourly estimates for the costs of any public safety personnel. Applicants should include the most relevant information describing historical service or staffing levels (“baseline information”) to demonstrate that all funds will be used to supplement existing efforts. For example, if a community requests funding for additional staffing for a specific time period, the application should include information about the staffing levels that have been used for that same time period during the license term of the gaming facility. Applicants are requested to provide as much detailed baseline information as practicable to help the Commission in its review.

The application should include sufficient backup information for the Review Team to fully understand the project(s). This information could include locus maps, catalog cuts of proposed equipment purchases, quotes, training course syllabi, etc. Please see the application form for additional information.

For applications requesting vehicle purchases, communities must demonstrate the following:

- That the vehicle is needed for a new effort being conducted by the community in response to a casino-related impact;
- Percent of time the vehicle will be used to address the casino impact;
- For traffic enforcement vehicles, that the community is significantly impacted by casino-related traffic;
- How the proximity of the community to the gaming establishment necessitates the purchase; and
- That the request is not for the replacement of existing vehicles in the fleet.

Identified Impacts: The Commission has identified public safety-related impacts associated with the gaming establishments, which municipalities may cite in their applications. There may be other impacts that have not been identified by the Commission that could be eligible for grant funds. If a municipality has identified additional impacts to be addressed, the applications must identify the impact and provide sufficient evidence that the impact is caused or is associated with a gaming establishment.

- Increased visitation and employment due to the casino will likely increase the interaction between public safety personnel and casino patrons and employees.

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- It is recognized by law enforcement and the casino industry that casinos and other hospitality-related businesses may attract certain types of crime including but not limited to human trafficking, money laundering, and drug trafficking. Other crimes that may be attributable to casinos include increased assaults, fraud, and property crimes.
- The presence of casinos has been demonstrated to cause an increase in cases of operating under the influence.
- Increases in traffic can cause increases in congestion, accidents, and vehicular/bicycle /pedestrian conflicts.
- The influx of visitors to a casino can result in an increase in calls for service and put pressure on local emergency services, including emergency responders like fire departments and EMS. This could lead to increased needs for mutual aid.

Possible Mitigation Measures

- Police training, including de-escalation training, implicit bias training, use-of-force training, or other training to help improve police/patron/employee interactions.
- Efforts to improve traffic safety that could include enhanced traffic enforcement, use of speed/message boards, public education programs, or other efforts that are demonstrated to improve traffic safety.
- Efforts to reduce impaired driving, potentially including sobriety checkpoints, saturation patrols, education programs, or other demonstrated measures to reduce impaired driving.
- Efforts to identify, monitor and address issues related to human trafficking, drug trafficking and money laundering.
- Efforts to better track casino-related crimes.
- Training for Fire Departments and EMS to address issues that arise specifically associated with the gaming establishment.

Ineligible Projects – MGC has identified the following projects/items as ineligible for grant funding:

- Equipment that is normally supplied by a public safety agency to their staff (e.g., uniforms, safety equipment, weapons, body armor, etc.).
- Routine replacement of vehicles – these are vehicles that would otherwise be replaced by the community if CMF funds were not available.
- Routine replacement of radio equipment.
- Equipment that does not specifically address a casino-related impact.
- Funding that supplants existing historical funding.
- Funding for Gaming Enforcement Unit personnel or operations costs specified or anticipated in the memoranda of understanding between the Massachusetts State Police and host communities' police departments.
- Any project does not address a casino-related impact.

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Gambling Harm Reduction

Funding for gambling harm reduction is designed to assist municipalities in identifying populations at risk for problem gambling, studying the impact of gambling on those populations, identifying solutions to help mitigate identified harms, and implementing solutions that help reduce the risk of gambling harms.

The Commission has received several applications to study youth gambling. If a community is proposing a study of youth gambling, please contact Commission staff prior to submitting the application to discuss methodology to ensure that the proposed study will not duplicate previous work.

Identified Impacts

- Certain groups of people are disproportionately at risk of gambling-related harm by the presence of a casino. These groups can be linked by race, ethnicity, gender, age, people who have recently immigrated, veteran status, and/or socioeconomic status.

MGC recently worked with Gambling Research Exchange Ontario (GREO) to compile research on different groups that may be relevant to your community's needs. Please click here to access the studies on different populations that may be at increased risk for gambling harm <https://massgaming.com/about/community-mitigation-fund/application-guidelines/>

Possible Mitigation Measures

- A municipality may use these funds for the development and planning of a study or project. Projects are primarily for community engagement, vision, and planning. Applicants may develop a plan to engage the community to identify a casino or gambling-related topic or issue which warrants further investigation. The product of this process should be a research strategy which may be considered for detailed research funding in subsequent funding cycles. We expect these types of grants to be for a one-year term.
- A community may also use these funds for conducting detailed research on the topic identified. Applicants that have a specific research topic and/or question and that are prepared to propose a research strategy. For this type of proposal, applicants must organize their proposal in the following order.

Specific Aims: State concisely the goals of the proposed research. Summarize the gambling-related harms and potential impacts that the results of the proposed project will exert on Massachusetts and the research field(s) involved.

Research Strategy: Provide a detailed research strategy, including the following:

Approach: Describe the overall strategy, methodology, and analyses to be used to accomplish the specific aims of the project.

Significance: Explain the importance of the topic or question that the proposed project addresses.

Innovation: Describe any new or novel theoretical concepts, approaches or methodologies to be used.

Protection of Human Subjects: Please summarize your plan to obtain Internal Review Board (IRB) approval. If you believe IRB approval is not required for this project, please provide justification.

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Collaboration and Knowledge of the Community: Describe the organization's relationship and understanding of the community with whom the study will take place.

Knowledge Translation and Exchange: Describe how an answer to the question or insight on the topic may mitigate gambling-related harms in the community. Identify specific activities and/or measures which may be supported by the Community Mitigation Fund in subsequent funding cycles. Describe a plan to share information with the community and/or use it to inform policy or practice.

Some examples of the MGC General Research Agenda and Community Engaged Research can be found: <https://massgaming.com/about/research-agenda/> or <https://massgaming.com/about/research-agenda-search/?cat=community-engaged-research>

- A community may also apply to fund a project that will help to mitigate a gambling harm identified via their own detailed research or the application of MGC research. Applicants can utilize research identified in the community-specific interventions slide deck found <https://massgaming.com/about/community-mitigation-fund/application-guidelines/> or impacts outlined in the MGC reports found <https://massgaming.com/about/research-agenda/> or <https://massgaming.com/about/research-agenda-search/?cat=community-engaged-research>

Ineligible Projects – MGC has identified the following projects/items as ineligible for grant funding:

- Project does not address a casino-related impact.
- Detailed research projects that are not grounded in available evidence.
- A project that will mitigate a gaming-related harm that is not grounded in their own detailed research or recommendations arising from MGC research (as outlined in the community specific interventions slide deck or MGC research reports referenced above).

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Specific Impact

Specific Impact Grants are only for projects that do not fit within the other categories of CMF Grants. The municipality must provide a thorough description of an identified impact of the gaming establishment and proposed mitigation measures to address the impact. The community should contact Commission staff to discuss any specific impact grants before submitting its application.

A community may also use this Specific Impact Grant to break out administrative and/or staffing costs associated with the grant as a whole.

Identified Impacts: The Specific Impact category recognizes that there may be other impacts associated with a gaming establishment that have not been identified by the Commission. If a municipality has identified an additional impact to be addressed, the application must identify the impact and provide sufficient evidence that the impact is caused by, or is associated with, a gaming establishment.

The Commission's regulation 205 CMR 125.01 2(b)4 defines operational impacts as:

"The community will be significantly and adversely affected by the operation of the gaming establishment after its opening taking into account such factors as potential public safety impacts on the community; increased demand on community and regional water and sewer systems; impacts on the community from storm water runoff, associated pollutants, and changes in drainage patterns; stresses on the community's housing stock including any projected negative impacts on the appraised value of housing stock due to a gaming establishment; any negative impact on local, retail, entertainment, and service establishments in the community; increased social service needs including, but not limited to, those related to problem gambling; and demonstrated impact on public education in the community."

Although these definitions include the types of operational impacts that may be funded, they are not limited to those. The decision will be made by the Commission after its review.

Eligible Expenses

The Commission will make funding available to mitigate gaming facility operational impacts that are being experienced or were experienced by the January 31, 2026, application deadline.

Ineligible Expenses

Any expense considered to be a municipal cost, such as any cost which may be included in its annual budget

- Any cost for which it receives payments through its Host Community Agreement or Surrounding Community Agreement.
- Any project that does not address a casino-related impact.
- Applications from non-governmental entities.

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REGIONAL AGENCY GRANT PROGRAM

3.0 REGIONAL AGENCY GRANT PROGRAM

The Commission will accept applications by regional agencies to address impacts on communities that go beyond one municipality and can be more effectively addressed in a regional manner.

3.1 Eligibility

M.G.L. c. 23K, Section 61 identifies eligible entities as “local and regional education, transportation, infrastructure, housing, environmental issues, and public safety, including the office of the county district attorney, police, fire, and emergency services. The Commission may, at its discretion, distribute funds to a governmental entity or district other than a single municipality in order to implement a mitigation measure that affects more than one municipality.”

This definition provides the Commission with broad authority regarding the distribution of mitigation funds to regional governmental entities. However, the Commission has identified two priority areas for project funding – regional workforce education programs and regional public safety.

While other regional governmental entities may be eligible for funding, any such entity proposing to apply for funding should contact the Community Affairs Division well in advance of the submission deadline to discuss project eligibility and casino-related impacts.

3.2 Key Programmatic Aspects

The reduction in funding for FY 2027 will result in reduced funding for the Regional Agency Grants. The Commission intends to award \$819,800 to Regional Agencies. All previously eligible entities continue to be eligible for grants; however, it is unlikely that all applicants will receive funding. The Commission has determined that workforce education and public safety are the highest priorities.

Considering this significant reduction in funding, the Commission reserves the right to prioritize applications and determine which requests to fund based on its assessment of a broad range of factors, including the extent of the public benefit each grant is likely to produce. The Commission also reserves the ability to fund only portions of requested projects or to fund only a percentage of the amounts requested. The following are some of the key aspects of the program:

- For each category of grant, the Commission has identified impacts that are likely to be caused by, or associated with, the gaming establishments. For these identified impacts, applicants may reference them in their applications.
- For each category of grant, the Commission has identified the types of projects that are generally acceptable to address casino-related impacts.
- For each category of grant, the Commission has identified ineligible projects or items.

3.3 Application Requirements

Grant applications are due to the Commission by 11:59 PM on January 31, 2026, via e-mail at MGCCMF@massgaming.gov or as a response to COMMBUYS BID Number: BD265-1068-1068C-1068L-121911. **Applications received after this time will not be considered for funding. Each**

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regional agency must submit only one application. Applications should include the following elements.

Please click here: www.massgaming.com/about/community-mitigation-fund/forms/ for the application forms and an example application.

- a. Applicants are required to fully complete the CMF Regional Agency Grant Application and fill out the appropriate section for the selected grant category.
- b. Applicants must identify an impact associated with the casino, describe how the project will address it, and provide justification for any funds requested.
- c. Applicants must submit an application detailing the scope, schedule, and budget, which provides details on how the agency will spend the money in accordance with the program guidelines. Agencies may submit additional materials to support their applications.

3.4 Waivers

The Commission may, in its discretion, waive or grant a variance from any provision or requirement contained in these Guidelines. Any requests for waivers shall be submitted with the Grant Application. Please click here for the waiver form: www.massgaming.com/about/community-mitigation-fund/forms/

3.5 Grant Categories

The Commission has identified three categories under which a regional agency may apply for funding. All applicants should make sure they are aware of each category's distinct requirements and that they apply under the relevant category. Projects that the Commission determines are incorrectly filed may be recategorized by staff.

Regional Planning Grants

Certain casino-related impacts may present challenges across multiple communities or create opportunities to leverage the presence of a casino to provide regional benefits. Projects to address these types of impacts are often better served using a regional agency to develop and implement solutions.

For FY 2027, the Commission is authorizing grants of up to \$75,000 for Regional Planning Agencies (RPAs) to identify and implement projects that address regional impacts associated with the gaming establishments.

The eligible RPAs for these grants are those that serve the casino's host community – the Metropolitan Area Planning Council for Region A, the Southeast Regional Planning and Economic Development District for the Category 2 facility, and the Pioneer Valley Planning Commission for Region B. Other governmental agencies may be eligible for this grant if their project meets all other program requirements. If interested, please contact Commission Staff in advance of application to confirm eligibility.

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Similar to the Community Planning and Transportation categories under the Municipal Block Grant Program, these grants are designed to help either address the negative impacts of the gaming establishment on the region or to take advantage of opportunities that the gaming establishment presents.

Regional planning projects must address an identified casino-related impact. Grant funds may be used for both project planning and project implementation. Planning projects must have a defined area or issue that will be investigated, as well as a clear plan for implementation of the results. Applicants should work in collaboration with or on behalf of impacted municipalities.

Planning grants are intended to assist agencies with gathering data and analysis, hiring planning consultants, performing engineering review/surveys, conducting public meetings, preparing final reports, and preparing analysis or design.

Identified Impacts: The Commission has identified impacts associated with the gaming establishment, which RPAs may cite in their application. There may be other impacts that have not been identified by the Commission that could be eligible for grant funds. If an agency has identified additional impacts to be addressed, the application must identify the impact and provide sufficient evidence that the impact is caused or is associated with a gaming establishment.

Positive Impacts

- Gaming establishments attract a large group of patrons and employees to their establishments that would not otherwise be present in the area. This provides opportunities for local communities and businesses to attract these patrons and employees to their communities and business establishments.
- Gaming establishments typically purchase millions of dollars of goods and services each year, much of which is purchased locally. This provides the opportunity for local businesses to provide these goods and services.
- Gaming establishments require a significant number of workers, which provide employment opportunities for local residents.

Negative Impacts

- Competition from the gaming establishment may have negative impacts on other businesses competing in the hospitality or entertainment industries.
- The presence of a gaming establishment may result in reallocated spending. Reallocated spending is spending on goods and services which would have occurred had the casinos never opened, but which did not occur because an individual chose to spend their money at the casino instead. The main areas where monies are reallocated are transportation, retail items, hotels and travel, restaurants and bars, recreation, non-live entertainment, and live entertainment.
- The marketing capabilities of the gaming establishments may put other competing local businesses at a disadvantage.
- Increased traffic associated with the gaming establishment may cause increased congestion on the major routes leading to/from the gaming establishment.

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- Increased traffic associated with the gaming establishment may result in increased vehicular accidents on major routes leading to/from the gaming establishment.
- Increased traffic associated with the gaming establishment may result in increased vehicular/bicycle/pedestrian conflicts.
- Increased traffic associated with the gaming establishment may cause localized increases in air pollution due to congestion.
- Increased visitation to the gaming establishment area may place a strain on public transit services.

Eligible Projects – The following types of projects may be considered to address casino related impacts:

- Marketing and tourism plans to attract casino patrons and employees to the municipality, highlight local businesses, promote recreational and entertainment opportunities, and help communities compete with the gaming establishments for business.
- Projects to provide economic development opportunities for local businesses.
- Programs to increase business opportunities to provide goods and services to the gaming establishments.
- Other programs to encourage casino employees to live/work/play in the region.
- Road safety audits.
- Complete Streets evaluations and designs.
- Studies to improve public transit.
- Multi-use path planning and design.
- Road/traffic signal improvement designs to improve vehicular safety and/or reduce traffic congestion.
- Planning for bike share networks.
- Studies to identify air pollution reduction strategies.
- Studies to identify ways to reduce single occupancy vehicles.

Ineligible Projects – The following types of projects have been deemed ineligible for grant funding:

- Projects that do not address a casino-related impact.
- Applications from non-governmental entities.

Regional Public Safety Grants

M.G.L. c. 23K, Section 61 identifies regional public safety agencies as being eligible for mitigation funds and specifically identifies the county District Attorney's Offices. The Commission seeks to support the Attorney General and District Attorney's Offices in jurisdictions where the establishment and operation of a casino have resulted in an increase in criminal cases. The objective of this category is to ensure that these offices have the necessary resources to effectively manage and prosecute cases associated with the operation of a casino.

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The regional agencies eligible for funding under this category include:

- The Office of the County District Attorneys
- Attorney General's Office
- Other relevant public safety agencies

For FY 2027, the Commission has established a maximum grant of \$75,000 for the District Attorney's Offices. Grant amounts for the Attorney General will be based on available funding and demonstrated need. Any other relevant public safety agencies will be limited to a maximum grant of \$75,000.

Identified Impacts: The Commission has identified regional public safety-related impacts associated with the gaming establishments, which agencies may cite in their applications. There may be other impacts that have not been identified by the Commission that could be eligible for grant funds. If an agency has identified additional impacts to be addressed, the application must identify the impact and provide sufficient evidence that the impact is caused or is associated with a gaming establishment.

- The introduction of casinos in the Commonwealth has led to increased criminal cases being handled by the District Attorney or Attorney General.
- It is recognized by law enforcement and the casino industry that casinos and other hospitality-related businesses may attract certain types of crime. This is including but not limited to human trafficking, money laundering, and drug trafficking. Other crimes that may be attributable to casinos include increased assaults, fraud, and property crimes.
- The presence of casinos has been demonstrated to cause an increase in cases of operating under the influence.

Eligible Costs

- Funding for personnel, including prosecutors, investigators, and administrative staff, and victim-witness advocates to assist these offices in handling the additional workload created by the casino's presence. The office must demonstrate an increase in criminal cases directly related to the presence of the casino. The office must have a clear plan for the utilization and record-keeping of the grant funds, specifying the roles and responsibilities of the additional personnel to be hired or assigned to the grant.

Ineligible Costs

- Staff whose jobs are not directly tied to the increased case load associated with a casino.
- A project that does not address a casino-related impact.

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Reporting and Accountability

Grant recipients will be required to provide quarterly progress reports on their progress as well as a final report with case numbers to ensure that the funds are being used as intended and to assess the program's impact on case management. The grantee will also provide the Commission staff a record of the following case types.

- Motor Vehicle/OUI
- Property Damage/Theft
- Assaults
- Sexual Assault
- Drug Offenses
- Money Laundering
- Disorderly Conduct
- Human Trafficking
- Firearms
- RICO
- Identity Theft

Additional details with respect to reporting will be included in the grant documents if awarded.

Regional Workforce Development Grants

Regional Workforce Development Grant applicants should focus on areas highly impacted by casino operations to mitigate strain in existing resources and a potential impact to the regional labor market. Applicants must be able to demonstrate that the education and skills training programs proposed are in response to an identified need at the casinos or to provide a sufficient supply of workers to backfill jobs being lost to the casinos. The Commission encourages new and innovative program ideas that align with the grant program's intention.

A consortium application is required. Eligible workforce development proposals must include a regional consortium approach to improve the skills, knowledge, and credential attainment for residents. The proposal must also include regional labor market information and evidence of employer partnerships.

Grantees will be expected to track numbers related to student participation and job placement across several defined parameters, such as gender, minority status, and veteran status.

Regional Workforce Development Program Spending

The Commission anticipates awarding one grant per region with the following maximum value:

- Region A - \$300,000
- Region B - \$300,000

Identified Impacts: The Commission has identified the following impacts associated with the gaming establishment, which may be cited in the application. There may be other impacts that have not been identified by the Commission that could be eligible for grant funds. If an agency has identified additional impacts to be addressed, the application must identify the impact and provide sufficient evidence that the impact is caused or is associated with a gaming establishment.

- Increase in demand for employees with a high school diploma or equivalent credentials
- Increase in demand for employees with understanding of roles in the hospitality field
- Increase in demand for employees who speak English
- Increase in demand for applicants with basic digital literacy

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Eligible Expenses

- Gaming school scholarships
- Post-secondary vocational programs in culinary, hospitality skills, banking, or general customer service training or vocational programs focused on English language/adult basic education
- A program that structures intentional connections among adult basic education, occupational training, and post-secondary education programs designed to meet the needs of both adult learners and employers
- Registered apprenticeships in the hospitality and banking fields
- Courses leading to college credits or industry-recognized certificates
- Adult Basic Education (“ABE”) and vocationally based English for Speakers of Other Languages (“ESOL”) training programs, contextualized learning
- Integrated Education and Training and industry-recognized credentials
- Translation services to help with student success
- Transportation and childcare vouchers
- Technology related to participant access
- Administrative costs include activities related to management, oversight, reporting, and record keeping, and monitoring of the grant program. This amount may not exceed 7.5% of the grant.

Ineligible Expenses

- Programs that are not directly or indirectly tied to the presence of a casino.

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4.0 OTHER GRANTS

4.1 Emergency Mitigation Grants

The Commission may award up to \$100,000 to cover newly identified impacts of an emergency nature that would cause significant harm to a community if it were not remedied in an expeditious fashion. The intent of this grant is to allow the Commission to be more responsive in addressing significant casino-related issues that do not fall within the normal CMF timelines. This grant is not intended to circumvent the normal CMF processes.

4.2 Tribal Gaming Technical Assistance Grants

The Commission may award up to \$100,000 to assist in the determination of potential impacts that may be experienced by communities in geographic proximity to the potential Tribal Gaming facility in Taunton. Such funding will only be made available after approval of any application by SRPEDD or a comparable regional entity.

5.0 OTHER PROGRAM ELEMENTS

5.1 Administrative Costs

For FY 2027, administrative costs are eligible under the CMF. Grantees may use up to 7.5% of the grant for administrative purposes up to \$50,000. Administrative costs include activities related to management, oversight, reporting, record keeping, and monitoring of the grant program. The grant application must identify how much of the grant funding is being used for administrative purposes and must also outline what funds are being contributed by the entity, such as in-kind services. Workforce Development Grants are not subject to the \$50,000 cap. **Applicants should indicate administrative costs by project where necessary and under specific impact when the funds will be directed across multiple projects.**

5.2 Operational Costs

Operational costs are intended to supplement existing departmental budgets impacted by the operation of a gaming facility. Examples of eligible items could include the cost of staff to run a program, overtime of public safety personnel; public safety equipment upgrades and/or supplies, increased demand on community regional water and sewer systems; and stresses on the community's housing.

5.3 Collaborative Applications

Applicants are encouraged to work with other local municipalities in the development of joint applications. Applications should provide details regarding consultations with nearby communities for cooperative regional efforts for pooling CMF funds for joint projects. For a joint application, the application must specify which community will be the fiscal agent for the grant. Each community must state how much and from which distribution category the funds are being drawn from. The administering entity would be responsible for all activities related to the management of the grant, such as providing timely quarterly reports, preparing expenditure reports, and all documentation needed as part of the Close-out Process. Each Community would list the joint applicants, specify

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which category, and how much each community is contributing. The funding may be requested only for the costs of a joint project being proposed by more than one community, not similar projects.

5.4 Regional Agencies

There are several Regional Planning Agencies which entities can use to provide services and resources. These agencies have expertise in planning, planning studies, development of mitigation plans for impacts, and can provide other technical assistance in its region.

5.5 Waivers and Variances

Applicants may request a waiver of a condition set forth in the Application for the Commission's consideration. All requests for waivers or variances shall be submitted with the Application. The Commission may, in its discretion, waive or grant a variance from any provision or requirement contained in these Guidelines where the Commission finds that:

- a. Granting the waiver or variance is consistent with the purposes of M.G.L. c. 23K;
- b. Granting the waiver or variance will not adversely affect the public interest; and
- c. Not granting the waiver or variance would cause a substantial hardship to the community, governmental entity, or person requesting the waiver or variance.

The Waiver shall set forth the specific provision of the Guidelines to which the waiver or variance is sought. The Waiver Form can be found at: www.massgaming.com/about/community-mitigation-fund/forms/

Applicants may contact Mary Thurlow at mary.thurlow@massgaming.gov or Joseph Delaney at Joseph.Delaney@massgaming.gov with any questions.

The Commission may grant a waiver or variance, deny a waiver or variance, or grant a waiver or variance subject to such terms, conditions, and limitations as the Commission may determine. The terms, conditions, covenants, duties, and obligations contained in this Application may be waived only by written agreement executed by duly authorized representatives of the Commission and the Grantee. No waiver by either party of any term, condition, covenant, duty or obligation shall be construed as a waiver of any other term, condition, covenant, duty or obligation nor shall a waiver of any breach be deemed to constitute a waiver of any subsequent breach, whether of the same or a different section, subsection, paragraph, clause, phrase, or other provision of this Grant.

5.6 Requests for Changes to Components of Grant Awards

The Commission authorized MGC staff to approve requests for changes to components of grant awards, provided that staff provides notice of such changes to all Commission members and provided further that such changes shall not exceed 10% of the grant award or \$25,000, whichever is smaller. Requests over this amount must be approved by a vote of the Commission.

5.7 Application Review Process

Commission Process:

The Commission may ask Applicants for supplementary materials, may request a meeting with Applicants, and reserves the ability to host a hearing or hearings on any Application. Depending on

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the content of the Application, Commission Staff may consult with outside agencies with expertise in various areas to assist the review process. Staff may provide a detailed memoranda of considerations for the Commissioner's to review in a public meeting.

The Commission reserves the ability to fund only portions of requested projects and to fund only a percentage of the amounts requested. The Commission also reserves the ability to place conditions on any award.

The Commission reserves the right to determine which requests to fund based on its assessment of a broad range of factors, including the extent of public benefit each grant is likely to produce.

Evaluation Factors:

- A demonstration that the impact is being caused by the gaming facility;
- The significance of the impact to be remedied;
- The potential for the proposed mitigation measure to address the impact;
- The feasibility and reasonableness of the proposed mitigation measure;
- A demonstration that any program to assist non-governmental entities is for a demonstrated public purpose and not for the benefit or maintenance of a private party;
- The significance of any matching funds including but not limited to the ability to compete for state or federal workforce, transportation or other funds;
- Any demonstration of regional benefits from a grant award;
- A demonstration that other funds from host or surrounding community agreements are not available to fund the proposed mitigation measure;
- A demonstration that such mitigation measure is not already required to be completed by the licensee pursuant to any regulatory requirements or pursuant to any agreements between such licensee and Applicant;
- The inclusion of a detailed scope, budget, and schedule for each mitigation request; and
- The inclusion of information detailing diversity in vendor/supplier spending practices relative to Minority Business Enterprises ("MBE"), Veteran's Business Enterprises ("VBE"), and Women's Business Enterprises ("WBE").

5.8 Grant Award Process for Municipal Block Grants

The following is the anticipated process for the CMF Municipal Block Grants:

- a. Eligible municipalities will receive notification from the Commission regarding the amount of proposed grant funding for their community. This notification will be sent via email to their respective Town Manager/City Administrator/Grant Manager and current CMF Grant Managers noted on previous applications. **Entities should notify the Community Affairs Division of any additional people or changes to ensure that notifications are correctly distributed.**
- b. Municipalities will have until January 31, 2026, to submit their application for the proposed grant amount previously issued by the Commission. This will constitute their application for funds as required by 23K Section 61. These applications must detail how the municipality plans to use the funding.
- c. If applications are not submitted by January 31, 2026, the municipality forfeits the funds for that year.

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- d. **After receipt of the Applications:** Members of the Review Team analyze and develop recommendations on the applications for the Commission. The Review Team will review each community's conformance with the Guidelines. Communities will be given the opportunity to modify their applications if the Review Team finds areas that do not comply with the Guidelines or require additional information.
- e. Once the applications are finalized, these will be brought to the Commission for final approval. Such decisions will be made prior to July 1, 2026.
- f. After the Commission's decision, grant instruments and contracts will be prepared and sent to the Applicants.

5.9 Rescission of Grants

If a Grantee does not expend the funds in a timely manner, the Commission may rescind the grant and make those funds available in the next grant round for the Region in which the grant originated. Before any grant is rescinded, Commission staff will notify the Grantee that the expenditures on the grant are not timely and establish a timeline for the Grantee to either expend the funds or have the grant rescinded.

5.10 Program Staff Directory

CMF Applicants are encouraged to contact the Commission's staff with any questions or concerns. The Commission's Chief of the Division of Community Affairs, Joseph Delaney, can be reached at (617) 721-9198 or via e-mail at joseph.delaney@massgaming.gov or MGCCMF. The Commission's address is 101 Federal Street, 12th Floor, Boston, MA 02110.

Joseph Delaney	617 721-9198	Joseph.Delaney@massgaming.gov
Mary Thurlow	617 979-8420	Mary.Thurlow@massgaming.gov

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ATTACHMENT A-

For FY 2027, the Commission will use a direct ratio of the currently available funding to the proposed funding for FY 2026. The total proposed funding for FY 2027 is \$5,000,000, and the total proposed funding for FY 2026 was \$19,500,000. Therefore, the available funding for FY 2027 is 25.64% of the FY 2026 Funding. This results in the following amounts being available for each region and the regional agencies:

Region A	\$2,949,100
Region B	\$1,102,800
Category 2	\$ 128,300
Regional Agencies	\$ 819,800

FY 2027 PROPOSED GRANT AMOUNTS BY REGION

Region A – Encore Boston Harbor FY 2027 Proposed Grant Amounts

Funding Available - \$2,949,100

Community	Base Grant	HCA/SCA Status	Proximity to Casino	Traffic	Total FY 2026 Grant Amount	FY 2027 Grant 25.64% of FY 2026 Grant*
Everett	\$200,000	\$400,000	\$1,600,000	\$662,000	\$2,862,000	\$733,900
Boston	\$200,000	\$200,000	\$800,000	\$1,407,000	\$2,607,000	\$668,500
Cambridge	\$200,000	\$200,000	\$300,000	\$0	\$700,000	\$179,500
Somerville	\$200,000	\$200,000	\$400,000	\$310,000	\$1,110,000	\$284,700
Medford	\$200,000	\$200,000	\$400,000	\$248,400	\$1,048,400	\$268,900
Malden	\$200,000	\$200,000	\$400,000	\$82,800	\$882,800	\$226,400
Revere	\$200,000	\$0	\$400,000	\$62,100	\$662,100	\$169,800
Chelsea	\$200,000	\$200,000	\$400,000	\$227,700	\$1,027,700	\$263,500
Saugus	\$200,000	\$0	\$0	\$0	\$200,000	\$51,300
Lynn	\$200,000	\$0	\$0	\$0	\$200,000	\$51,300
Melrose	\$200,000	\$0	\$0	\$0	\$200,000	\$51,300
Total	\$2,200,000	\$1,600,000	\$4,700,000	\$3,000,000	\$11,500,000	\$2,949,100

***All grant amounts are rounded to the nearest \$100.**

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Region B – MGM Springfield FY 2027

Proposed Grant Amounts Funding Available - \$1,102,800

Community	Base Grant	HCA/SCA Status	Proximity to Casino	Traffic	Total FY 2026 Grant Amount	FY 2027 Grant 25.64% of FY 2026 Grant*
Springfield	\$75,000	\$150,000	\$666,000	\$512,700	\$1,403,700	\$360,000
W Springfield	\$75,000	\$75,000	\$281,000	\$87,300	\$518,300	\$132,900
Holyoke	\$75,000	\$75,000	\$84,000	\$60,000	\$294,000	\$75,400
Chicopee	\$75,000	\$75,000	\$142,000	\$49,100	\$341,100	\$87,500
Ludlow	\$75,000	\$75,000	\$84,000	\$10,900	\$244,900	\$62,800
Wilbraham	\$75,000	\$75,000	\$142,000	\$21,800	\$313,800	\$80,500
E Longmeadow	\$75,000	\$75,000	\$142,000	\$60,000	\$352,000	\$90,300
Longmeadow	\$75,000	\$75,000	\$142,000	\$32,800	\$324,800	\$83,300
Agawam	\$75,000	\$75,000	\$142,000	\$65,400	\$357,400	\$91,700
Hampden	\$75,000	\$0	\$0	\$0	\$75,000	\$19,200
Northampton	\$75,000	\$0	\$0	\$0	\$75,000	\$19,200
Total	\$825,000	\$750,000	\$1,825,000	\$900,000	\$4,300,000	\$1,102,800

***All grant amounts are rounded to the nearest \$100.**

Category 2 – Plainridge Park Casino FY 2027

Proposed Grant Amounts Funding Available - \$128,300

Community	Base Grant	HCA/SCA Status	Proximity to Casino	Traffic	Total FY 2026 Grant Amount	FY 2027 Grant 25.64% of FY 2026 Grant*
Plainville	\$25,000	\$50,000	\$50,000	\$28,300	\$153,300	\$39,300
Wrentham	\$25,000	\$25,000	\$20,000	\$6,800	\$76,800	\$19,700
Foxborough	\$25,000	\$25,000	\$10,000	\$4,500	\$64,500	\$16,500
Mansfield	\$25,000	\$25,000	\$10,000	\$3,000	\$63,000	\$16,200
N. Attleborough	\$25,000	\$25,000	\$10,000	\$21,700	\$81,700	\$21,000
Attleborough	\$25,000	\$25,000	\$0	\$10,700	\$60,700	\$15,600
Total	\$150,000	\$175,000	\$100,000	\$75,000	\$500,000	\$128,300

***All grant amounts are rounded to the nearest \$100.**

ATTACHMENT B- TRIP DISTRIBUTION MAPS REGION A ENCORE BOSTON HARBOR

Encore Boston Harbor Patron Trip Distribution

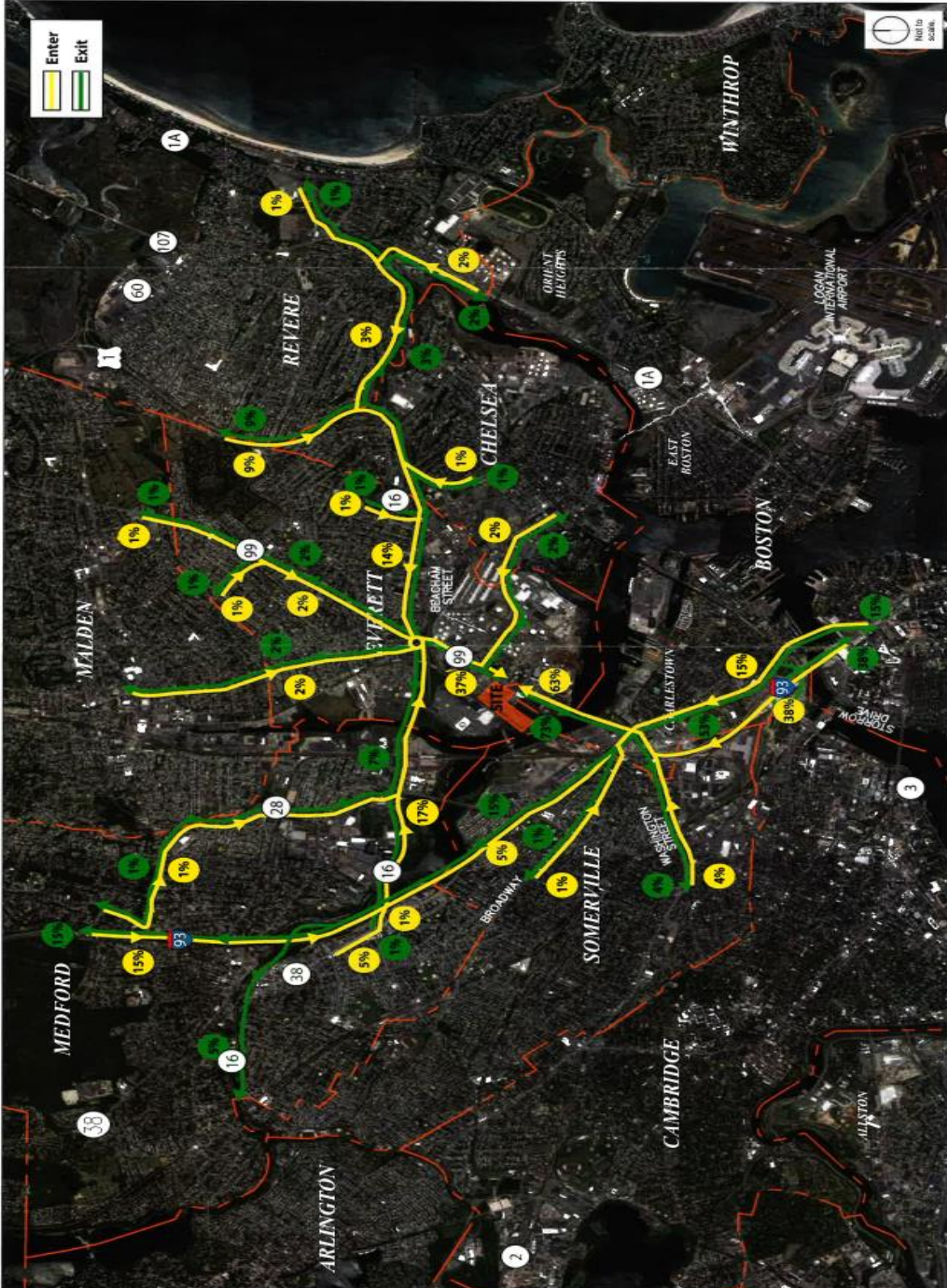
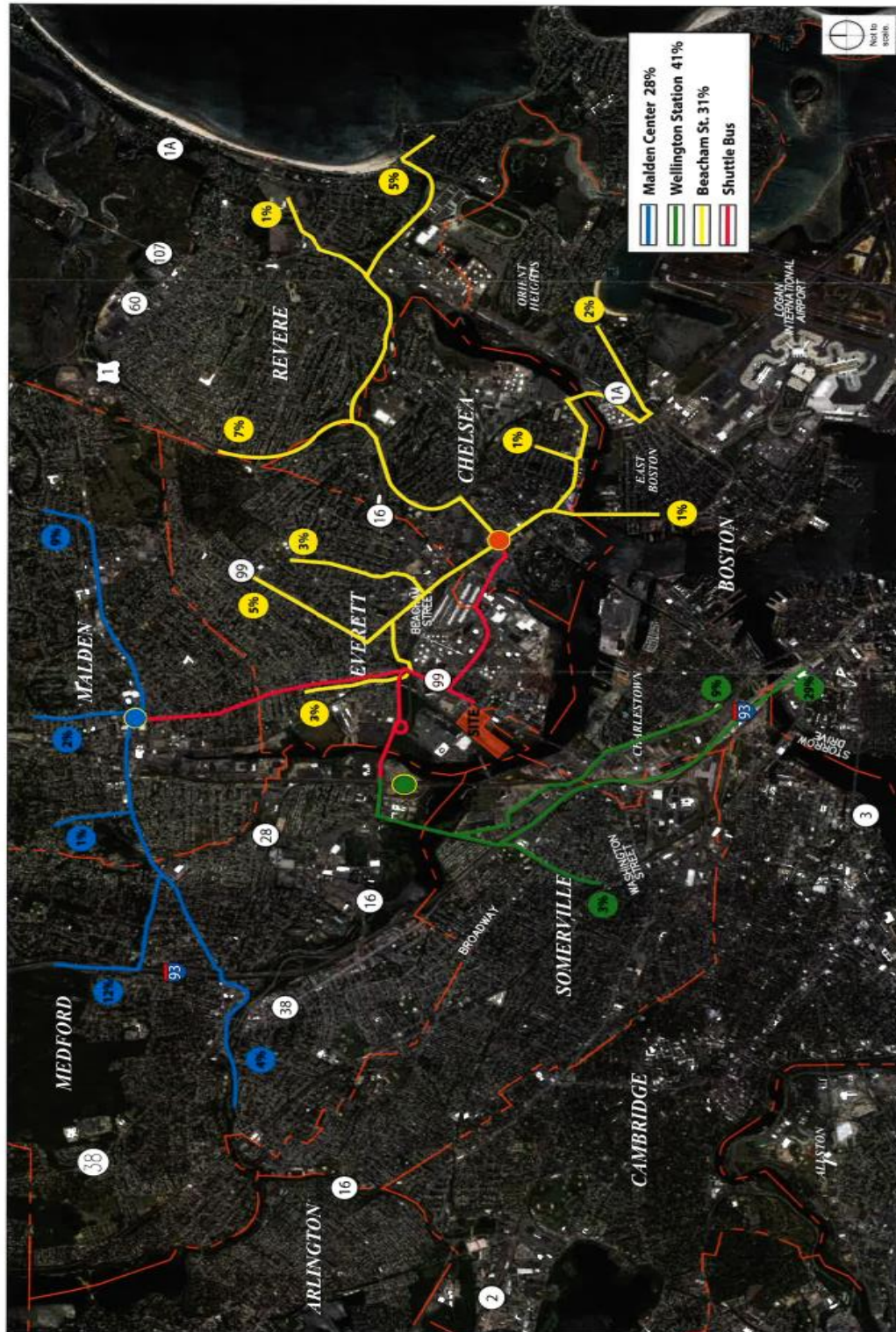


Figure 4-49
Trip Distribution (Patrons)
Source: Howard/Stein-Hudson Associates, Inc., 2013

Encore Boston Harbor Employee Trip Distribution

Draft Environmental Impact Report



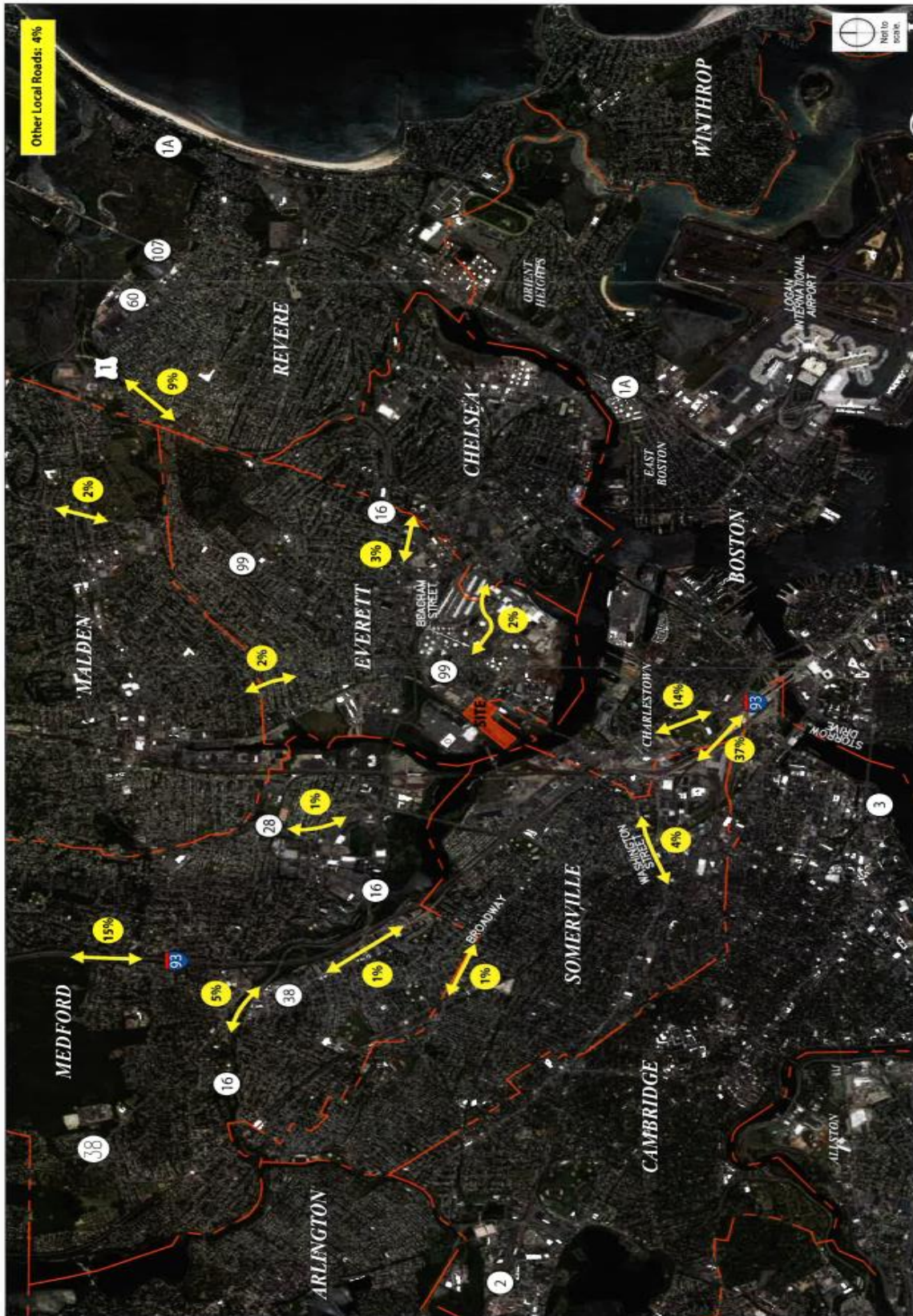
Wynn Everett

Figure 4-50
Trip Distribution (Employees)
Source: Howard/Stein-Hudson Associates, Inc., 2013

Wynn Everett
Everett, Massachusetts

Draft Environmental Impact Report

Wynn Everett



Wynn Everett
Everett, Massachusetts

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Encore Boston Harbor Trip Distribution by Travel Corridor

Wynn Everett

Draft Environmental Impact Report

Table 4-21, Vehicle Trip Distribution by Travel Corridor

Travel Corridor	Patron Percent	Employee Percent	Composite Percent
I-93 North	15%	12%	15%
Route 16 West	5%	3%	5%
Route 38 West	1%	1%	1%
Broadway West	1%	1%	1%
Washington Street West	4%	3%	4%
I-93 South	38%	29%	37%
Rutherford Avenue	15%	9%	14%
Beacham Street East	2%	4%	2%
Route 16 East	3%	6%	3%
Route 1 North	9%	7%	9%
Route 99 North	2%	5%	2%
Main St (Everett Malden)	2%	3%	2%
Route 28 North	1%	1%	1%
Other Local	2%	16%	4%
Total	100%	100%	100%

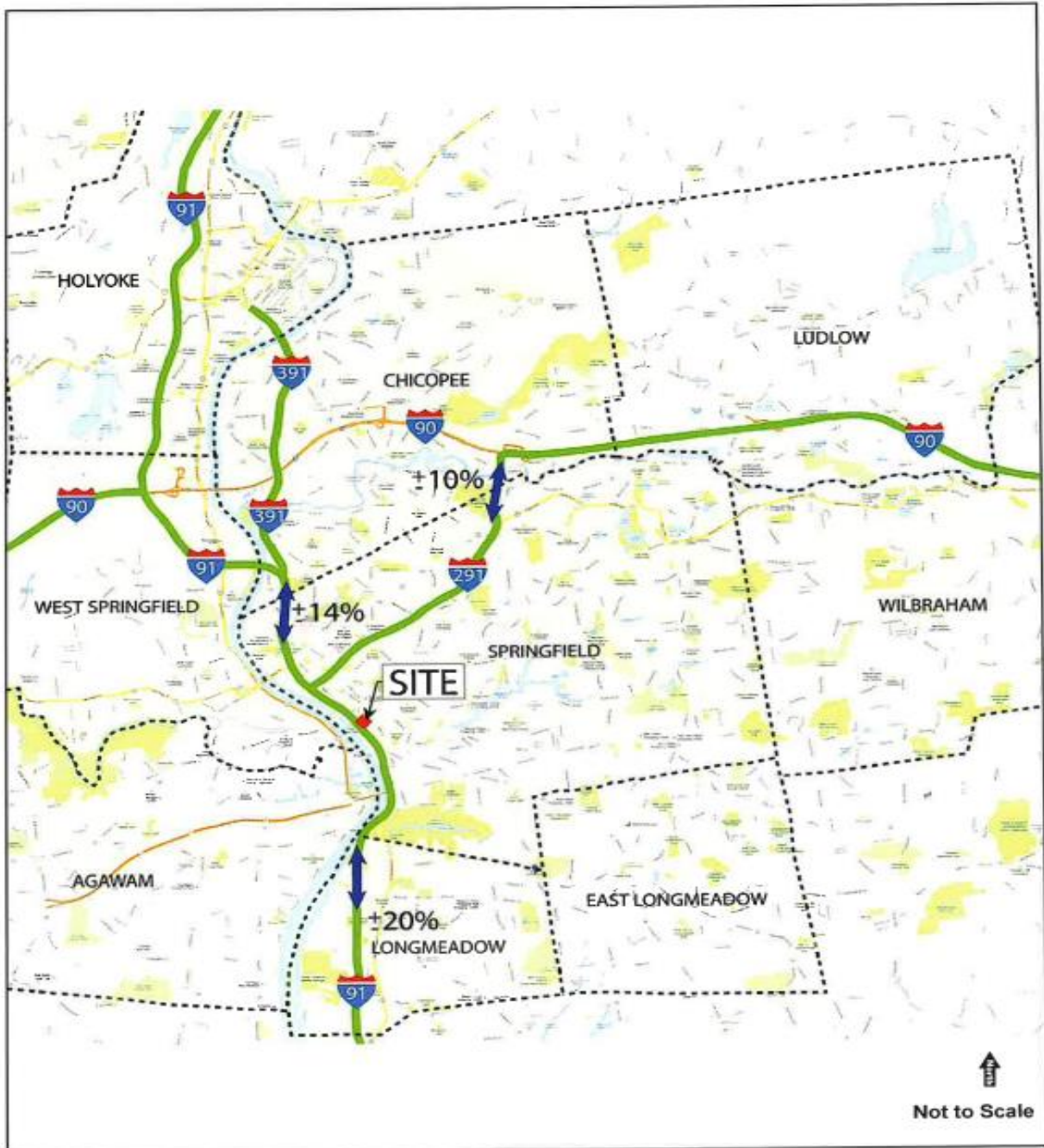
The patron and employee trip distribution patterns were used to assign new Project vehicle trips to the area roadway network. Figure 4-51A and Figure 4-51B depict the Friday p.m. peak hour Project trip assignments at intersections 1-26, located in Everett. Figure 4-52 shows Friday p.m. peak hour Project trip assignments at intersections 27-32, located in Chelsea and Revere. Figure 4-53 shows the Friday p.m. peak hour Project trip assignments at intersections 33-44, located in Medford. Figure 4-54 shows the Friday p.m. peak hour Project trip assignments at intersections 45-57, located in Somerville, Boston, and Cambridge. Figure 4-55A and Figure 4-55B depict the Saturday afternoon peak hour Project trip assignments at intersections 1-26, located in Everett. Figure 4-56 shows the Saturday afternoon peak hour Project trip assignments at intersections 27-32, located in Chelsea and Revere. Figure 4-57 shows the Saturday afternoon peak hour Project trip assignments at intersections 33-44, located in Medford. Figure 4-58 shows the Saturday afternoon peak hour Project trip assignments at intersections 45-57, located in Somerville, Boston, and Cambridge.

Plainridge Park Casino Trip Distribution



FY 2027 Community Mitigation Fund Guidelines

MGM Springfield Trip Distribution Freeway



MGM Springfield Springfield, Massachusetts

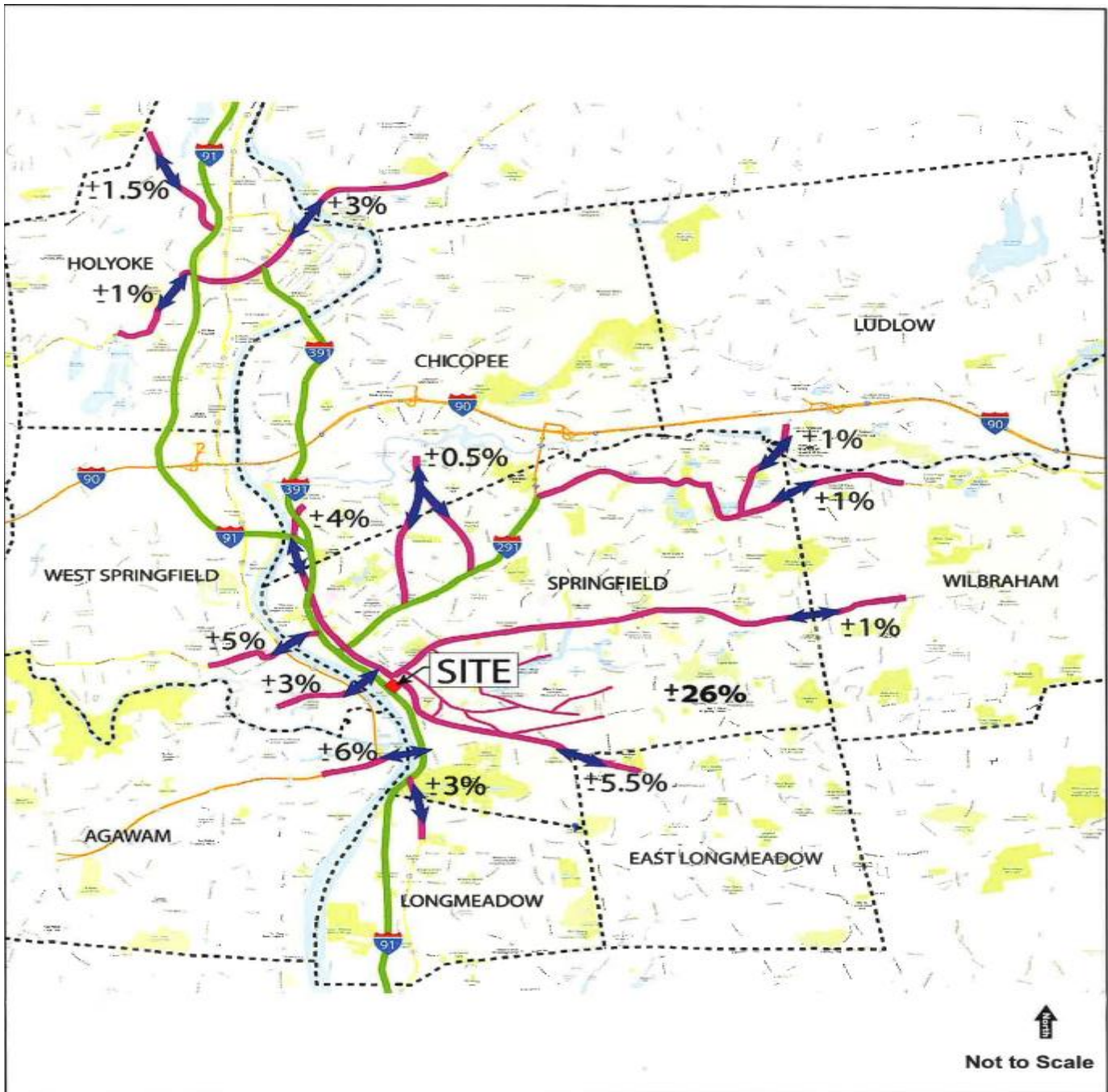
TEC

Figure 6.2-9

Total Site-Generated Trip Distribution - Freeway Corridors

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MGM Springfield Trip Distribution -Surface Roads



MGM Springfield Springfield, Massachusetts

TEC

Figure 6.2-8
Total Site-Generated Trip Distribution - Surface Roads

FY 2027 Community Mitigation Fund Guidelines

MGM Springfield Trip Distribution -Surface Roads

Trip Distribution Summary

The resulting trip distribution by land use for the proposed development is summarized in Table 6.2-9. The site-generated traffic volume networks for each land use are presented in Appendix B-12. The regional scale distribution of trips is shown in Figures 6.2-8 and 6.2-9 for the local roadways and freeway corridors, respectively. The regional scale site-generated trip increases is shown in Figures 6.2-10 and 6.2-11 for local roadways and freeway corridors, respectively. The resulting site-generated traffic-volume networks for Friday evening and Saturday midday peak hours are shown in Figures 6.2-12 through 6.2-15.

Table 6.2-9 Trip Distribution Summary

Routes	Percentage from Route / Community				
	Casino / Hotel Patron	Casino / Hotel Employee & Armory Square Office	Armory Retail	Apartment	Total
Route 5 - Longmeadow	1.0%	3.9%	5.0%	0.6%	2.8%
Route 83 - East Longmeadow	3.9%	5.7%	7.2%	5.6%	5.4%
South End Bridge - Agawam	5.0%	5.0%	8.0%	3.2%	6.1%
Memorial Bridge - West Springfield	2.5%	4.0%	4.0%	3.7%	3.3%
North End Bridge - West Springfield	3.5%	5.0%	6.0%	6.3%	4.7%
Main Street - Chicopee	3.7%	5.5%	3.8%	5.5%	4.0%
Liberty St / St. James Ave - Chicopee	0.4%	0.8%	0.7%	0.7%	0.6%
Boston Road (Route 20) - Wilbraham	0.8%	4.0%	0.7%	1.5%	1.1%
Wilbraham St - Wilbraham	0.9%	0.9%	1.5%	0.2%	1.1%
Route 21 - Ludlow	0.6%	2.0%	1.2%	0.9%	1.0%
Route 141 - Holyoke	1.5%	1.9%	1.3%	0.5%	1.4%
Route 203 West - Holyoke	1.6%	0.8%	0.3%	1.0%	1.0%
Route 203/16 - Holyoke	3.5%	3.6%	1.6%	3.6%	2.8%
I-91 North*	22.0%	12.0%	6.0%	6.1%	14.3%
I-91 South	30.0%	2.0%	13.0%	0.0%	19.6%
I-291 Northeast	15.3%	7.3%	5.3%	1.1%	10.1%
City of Springfield	10.5%	41.9%	37.7%	64.7%	26.0%
Total*	100.0%	100.0%	100.0%	100.0%	100.0%

*Note that all routes through Holyoke will also use I-91 North. Therefore, the percentages shown for I-91 North also include traffic from Holyoke.



November 3, 2025

Introduction

Crown MA Gaming, LLC d/b/a DraftKings (“DraftKings”) respectfully submits this Corrective Action Plan (“CAP”) in response to the Massachusetts Gaming Commission’s (“Commission”) Decision dated July 25, 2025 (“Decision”). This CAP addresses item two of the Commission’s Decision requiring the development of a CAP to ensure that (1) regulatory communications are properly communicated internally, and (2) no credit card deposits will be accepted or used for wagers.

I. Regulatory Communications

To ensure regulatory communications are properly communicated internally, DraftKings has developed and implemented an improved compliance communication and execution framework consisting of the following:

- Regulatory communications received through email from the Commission are now logged and tracked through a case management system, ServiceNow.
- Service Now routes such communications to the designated email distribution lists in gaming compliance: (1) RGC (regulatory gaming compliance) Inquiries, (2) RGC Complaints (regulatory complaints), (3) RGC Incidents (regulatory incidents), and/or (4) RGC Management (regulatory escalations). The email distribution lists are monitored by Gaming Compliance associates who route the email communications to the appropriate teams as needed for additional support (e.g., AML/Fraud, Privacy, Management, Licensing, etc.). Senior compliance leaders are also included on each of the distribution lists.
- If an individual receives an email directly from the Commission and the email distribution list is not copied, employees have been instructed to forward that communication to the relevant email distribution list so that the communication is routed appropriately.
- There is a weekly (or more often if needed) meeting among DraftKings’ Compliance and Risk Senior Leadership, chaired by the Chief Compliance and Risk Officer. There are attendees from all compliance and risk departments: Strategy, Corporate Compliance, Privacy, Financial Crimes, Licensing, and Gaming Compliance. This is a comprehensive cross-functional meeting where DraftKings’ product lines are covered: Online Sports Betting, iGaming, DFS/Poker/Horse, Retail & Lottery. In the event there is a question or concern regarding a regulatory communication from the Commission, this meeting provides a regularly scheduled opportunity for these items to be discussed.

II. Elimination of Credit Card Deposits for Sportsbook and Casino Wagers

In addition to the restrictions on using credit card funds for sportsbook wagers in Massachusetts already in place, as of August 25, 2025, DraftKings removed credit card as a deposit option for sportsbook and casino throughout the United States.

Additionally, DraftKings worked directly with its card payment processors, Braintree (“Paypal”) and Paysafe, to block the DraftKings’ credit card Merchant Identification from their processing systems. This control is to ensure that any credit card deposit made for any other DraftKings product, such as daily fantasy sports, cannot be used on wagering for sportsbook and casino.

To provide further oversight, DraftKings has developed monitoring by the Financial Platform Team designed to detect a credit card deposit or the use of credit card funds in a jurisdiction where they are not permitted.



Legal Division

TO: Jordan Maynard, Chair
Eileen O'Brien, Commissioner
Bradford Hill, Commissioner
Nakisha Skinner, Commissioner
Paul Brodeur, Commissioner

FROM: Judith A. Young, Associate General Counsel
Burke Cain, Chief of the Gaming Agents Division
David Diorio, Casino Compliance Coord. / Asst. Chief of the Gaming Agents Div.

CC: Justin Stempeck, Interim General Counsel

RE: Update to 205 CMR 146.13: *Blackjack Table; Card Reader Device; Physical Characteristics; Inspections*

DATE: November 6, 2025

Code of Massachusetts Regulations ("CMR") Chapter 146.00: *Gaming Equipment*, sets forth the equipment necessary to conduct table games at the two gaming establishments within the Commonwealth. Sections of the regulation prescribe the requisite chips, dice, displays (placards), shufflers, and physical layouts for common table games and game variations including but not limited to, Blackjack, Roulette, Poker and Baccarat.

Titles of the specific sections within 205 CMR 146.00, which may have been misnumbered or not fully listed, have been updated and corrected. 205 CMR 146.13: *Blackjack Table; Card Reader Device; Physical Characteristics*, has been amended in sections to increase clarity, and to remain consistent with the [Authorized Rules of the Game of Blackjack](#).

The Legal Division, in conjunction with the IEB's Gaming Agent's Division are seeking final authorization to file the amended regulation and Amended Small Business Impact Statement (ASBIS) with the Secretary of the Commonwealth.

205 CMR 146.00 was approved by the Commission to begin promulgation on September 4, 2025, and was promulgated in the ordinary course. The regulation was posted for public comment on September 17th. A public hearing was held on October 28, 2025. No comments were received regarding this regulation; and no additional changes have been made to the regulation since its initial presentation to the Commission.

If authorized by the Commission, the final draft of the regulation and ASBIS will be filed on November 7, 2025, and become effective on November 21, 2025.



Massachusetts Gaming Commission

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

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 146.00: GAMING EQUIPMENT

Section

- 146.01: Gaming Chips and Plaques (General Rules)
- 146.02 Receipt of Gaming Chips or Plaques from Manufacturer or Distributor; Inventory, Security, Storage and Destruction of Chips and Plaques
- 146.03: Value Gaming Chips
- 146.04: Non-value Gaming Chips
- 146.05: Non-value Chips; Permitted Uses; Inventory and Impressment
- 146.06: Tournament Chips
- 146.07: Poker Rake Chips
- 146.08: Gaming Plaques; Issuance and Use; Denominations; Physical Characteristics
- 146.09: Exchange and Redemption of Gaming Chips, Plaques and Coupons
- 146.10 : Roulette Wheel and Table; Physical Characteristics; Double Zero Roulette Wheel Used as a Single Roulette Wheel
- 146.11 : Roulette Balls
- 146.12 : Roulette; Inspection Procedures; Security Procedures
- 146.13 : Blackjack Table; Card Reader Device; Physical Characteristics; Inspections
- 146.14 : Three-card Poker Table; Physical Characteristics
- 146.15 : Spanish 21 Table; Physical Characteristics
- 146.16 : Blackjack Switch Table; Physical Characteristics
- 146.17 : Craps and Mini-craps Tables; Physical Characteristics
- 146.18 : Baccarat, Midi-baccarat, Mini-baccarat, and Baccarat-chemin de Fer Tables; Physical Characteristics
- 146.19 : Big Six Wheel and Layout; Physical Characteristics
- 146.20: Sic Bo Table; Sic Bo Shaker; Physical Characteristics
- 146.21 : Pai Gow Poker Table; Pai Gow Poker Shaker; Physical Characteristics; Computerized Random Number Generator
- 146.22 : Pai Gow Table; Pai Gow Shaker; Physical Characteristics
- 146.23 : Chase the Flush Table; Physical Characteristics
- 146.24 : Poker Table; Physical Characteristics
- 146.25 : Double Down Stud Table; Physical Characteristics
- 146.26 : Caribbean Stud Poker Table; Physical Characteristics
- 146.27 : Let It Ride Poker Table; Physical Characteristics
- 146.27146.28 Pontoon 21 Table; Physical Characteristics
- 146.29: Fast Action Hold'em Table; Physical Characteristics
- 146.30: Casino War Table; Physical Characteristics
- 146.31 : Colorado Hold'em Poker Table; Physical Characteristics
- 146.32 : Boston 5 Stud Poker Table; Physical Characteristics
- 146.33 : Double Cross Poker Table; Physical Characteristics
- 146.34 : Double Attack Blackjack Table; Physical Characteristics
- 146.35 : Four-card Poker Table; Physical Characteristics
- 146.36 : Texas Hold'em Bonus Poker Table; Physical Characteristics
- 146.37 : Flop Poker Table; Physical Characteristics
- 146.38 : Two-card Joker Poker Table; Physical Characteristics
- 146.39 : Asia Poker Table, Asia Poker Shaker; Physical Characteristics; Computerized Random Number Generator
- 146.40 : Ultimate Texas Hold'em Table; Physical Characteristics
- 146.41 : Winner's Pot Poker Table; Physical Characteristics
- 146.42 : Supreme Pai Gow Table; Pai Gow Poker Shaker; Physical Characteristics; Computerized Random Number Generator
- 146.43 : Mississippi Stud; Physical Characteristics
- 146.44 : Red Dog Table; Physical Characteristics
- 146.45 : Dice; Physical Characteristics
- 146.46 : Dice; Receipt; Storage; Inspections; and Removal From Use
- 146.47 : Manual and Automated Dice Shakers; Security Procedures
- 146.48 : Cards; Physical Characteristics
- 146.49 : Cards; Receipt, Storage, Inspections and Removal From Use
- 146.50: Pre-shuffled and Pre-inspected Cards
- 146.51 : Dealing Shoes; Automated Shuffling Devices
- 146.52 : Pai Gow Tiles; Physical Characteristics
- 146.53 : Pai Gow Tiles; Receipt; Storage; Inspections and Removal From Use
- 146.54 : Inspection and Approval of Gaming Equipment and Related Devices and Software

Section: continued

146.55 : Approval of Gaming Equipment/Approval of New Gaming Equipment

146.56 : Security of Gaming Equipment

146.58 : Crazy 4 Poker Table; Physical Characteristics

146.59 : Criss-cross Poker Table Physical Characteristics

146.60: Free Bet Blackjack; Physical Characteristics

146.61 : Heads Up Hold'em ; Physical Characteristics

146.62 : High Card Flush; Physical Characteristics

146.63 : Table Game Progressive Wager Equipment

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

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

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

- (a) The name or trade name of the gaming licensee offering the game; and
- (b) Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number.

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

- (a) Blackjack pays 3 to 2 or 6 to 5;
- (b) The draw rules of one of the following options:
 - 1. Dealer must draw to 16 and stand on all 17s; or
 - 2. Dealer must hit on soft 17s; ~~or~~
- (c) Insurance pays 2 to 1.

(4) If a gaming licensee offers blackjack rule variations, the blackjack layout shall have imprinted on it the appropriate rules or payout odds observed for the particular version of blackjack being offered, which may include:

- (a) Blackjack pays 1 to 1;
- (b) Dealer must draw to 16 and stand on all 17s or Dealer must hit on soft 17s;
- (c) Dealer's hole card dealt face up; or
- (d) Other similar language approved by the Assistant Director of the IEB.

(5) Each blackjack table shall have a drop box and a tip box attached to it with the location of said boxes on the same side of the gaming table, but on opposite sides of the dealer, or an area approved by the Assistant Director of the IEB.

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

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

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

- (a) Three separate designated betting areas for each player position at the table with each

separate betting area being numbered one through three; provided, however, that the number of player positions at each table shall not exceed six;

(b) A separate designated area on the layout for each player position for the placement of insurance wagers;

(c) A separate designated area on the layout for each player position for the placement of double down wagers;

(d) A separate designated area on the layout for each player position for the placement of split pair wagers; and

(e) Three separate areas designated for the placement of the dealer's original face up card with each separate area being numbered one through three.

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

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

(a) A separate acceptor device for the placement of a progressive wager. Each acceptor device shall have a light which shall illuminate upon placement and acceptance of a gaming chip;

(b) A method to ensure that only one progressive blackjack wager is made per spot, per round of play;

(c) A device or method to indicate that a progressive blackjack wager has been won;

(d) A sign describing the winning wagers and the payouts to be awarded on winning progressive blackjack wagers at a location near or on the table;

(e) A table controller panel which shall be equipped with a "lock-out" button which, once activated by the dealer, will prevent any player's gaming chip from being recognized in the acceptor device; and

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

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

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

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

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

controller;

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

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

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

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

- (a) A layout which shall include, at a minimum, an additional designated betting area bearing the inscription "Match-the-dealer" at each of the player positions at the table; and
- (b) A layout inscription or sign posted at the blackjack table indicating the payout odds for the Match-the-dealer wager.

(14) If a gaming licensee offers the 20-point bonus wager pursuant to the authorized Rules of the Game of blackjack, the layout otherwise required by 205 CMR 146.13 shall also include, at a minimum, an additional designated betting area for the 20-point bonus wager at each of the player positions at the table. The blackjack table shall also contain a sign setting forth the payout odds for the 20-point bonus wager.

(15) If a gaming licensee offers the option set forth in the authorized Rules of the Game of blackjack that requires the dealer to draw additional cards on a soft 17, the blackjack layout shall have imprinted on it, at a minimum, the following inscription instead of the inscription set forth in 205 CMR 146.13(3)(b): "Dealer must draw to 16 and soft 17 and stand on hard 17's and above all 18's."

(16) If a gaming licensee offers the optional bonus wager pursuant to the authorized Rules of the Game of blackjack, the layout otherwise required by 205 CMR 146.13 shall include, at a minimum, an additional designated betting area for such wager at each of the player positions at the table. In addition, payout odds for the optional bonus wager shall be inscribed on the layout or posted on a sign at each such blackjack table.

(17) If a gaming licensee requires a hand fee, the approved layout otherwise required by 205 CMR 146.13 shall include, at a minimum, an additional designated area at each player position for the placement of the hand fee.

REGULATORY AUTHORITY

205 CMR 146.00: M.G.L. c. 23K, §§ 2, 4(37), and 5.



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this amended Small Business Impact Statement in accordance with G.L. c.30A, § 5 relative to the amendment to **205 CMR 146.00: Gaming Equipment**, specifically **146.13: Blackjack Table; Card Reader Device; Physical Characteristics; Inspections**, for which a public hearing was held on October 28, 2025.

This regulation is primarily governed by G.L. c. 23K, § 2, 4(37) and 5. This regulation applies directly to gaming licensees, equipment manufacturers, and Blackjack dealers. Accordingly, it is not anticipated to have an impact on small businesses.

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

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

This regulation will not create any additional reporting requirements for small businesses.

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

There are no schedules or deadlines for compliance or reporting requirements established this regulation.

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

This regulation does not impose any reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:

A performance standard is appropriate to prescribe alteration of Blackjack tables in casinos; both to provide clarity for guests and to be consistent with the Commission’s approved rules of the game of Blackjack.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:



Massachusetts Gaming Commission

The amendments to this regulation are unlikely to deter or encourage the formation of small businesses within the Commonwealth.

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

Alternative regulatory methods have not been utilized, as these regulations are not likely to adversely impact small businesses.

Massachusetts Gaming Commission

By:



Judith A. Young
Associate General Counsel
Legal Division

Dated: November 6, 2025



Massachusetts Gaming Commission



Memorandum

To: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

From: Autumn Birarelli, Staff Attorney

Cc: Justin Stempeck, Interim General Counsel

Re: Finalizing proposed amendment to 205 CMR 238.48

Date: October 30, 2025

Enclosed for the Commission's review is the proposed final draft of 205 CMR 238.00: Additional Uniform Standards of Accounting Procedures and Internal Controls for Sports Wagering, specifically 205 CMR 238.48: Expiration of Sports Wagering Tickets and Vouchers; Payment to the Sports Wagering Control Fund. The amendment establishes an additional method by which funds from expired wagers may be paid to the Sports Wagering Control Fund.

This regulation amendment was before the Commission for initial review at a public meeting on September 4, 2025. After initial discussion and review the Commission voted to promulgate the regulation by the normal process. A public hearing was held on October 28, 2025. No comments pertaining to this regulation were received and no edits have been made to the regulation since its presentation to the Commission on September 4, 2025.

We are seeking a vote to adopt the final version of the proposed regulation. The final version of the regulation and accompanying amended small business impact statement have been included in the Commissioners' Packet.



Massachusetts Gaming Commission

205 CMR 238.00: ADDITIONAL UNIFORM STANDARDS OF ACCOUNTING PROCEDURES
AND INTERNAL CONTROLS FOR SPORTS WAGERING

Section

238.48 : Expiration of Sports Wagering Tickets and Vouchers; Payment to the Sports Wagering Control Fund

- (1) The system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include provisions governing the expiration of winning Sports Wagering tickets and vouchers that provide, at a minimum, that:
 - (a) Any money that is owed to a patron by a Sports Wagering Operator as a result of a winning Sports Wagering ticket or voucher must be claimed within one year of the date of the Sporting Event for which the Wager was won or the obligation of the Sports Wagering Operator to pay the patron will expire. Upon expiration of the obligation, the involved funds must be transferred to the Sports Wagering Control Fund in accordance with M.G.L. c. 23N, § 13(h). In calculating the one year period referenced in 205 CMR 238.48(1)(a) and in M.G.L. c. 23N, § 13(h), any period of time for which the Gaming Establishment or Sports Wagering facility was not in operation shall be excluded; and
 - (b) A Sports Wagering Operator shall maintain a record of all unclaimed winning Sports Wagering tickets and vouchers that have expired.
- (2) Before the end of each calendar month, the Sports Wagering Operator shall report the total value of winning Sports Wagering tickets and vouchers owed to its patrons that expired during the preceding calendar month in a format prescribed by the Commission.
- (3) Each Sports Wagering Operator shall submit ~~a wire transfer or~~ a check with its monthly report payable to the Sports Wagering Control Fund in accordance with M.G.L. c. 23N, § 13(h) in the amount of the winning Sports Wagering tickets and vouchers owed to its patrons that expired during the preceding month as stated in the report.
- (4) Upon the payment of the expired debt, the Sports Wagering Operator shall post the payment and remove the amount from its records as an outstanding debt.
- (5) Failure to make the payment to the Sports Wagering Control Fund by the due date shall result in the imposition of penalties and interest as prescribed by 205 CMR.
- (6) Nothing in 205 CMR 238.648 shall preclude the Sports Wagering Operator from, in its discretion, issuing cash or other form of complimentary to a patron to compensate the patron for a winning Sports Wagering ticket or voucher that has expired.



AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Amended Small Business Impact Statement in accordance with G.L. c. 30A, § 5 relative to the proposed amendments to 205 CMR 238.00: Additional Uniform Standards of Accounting Procedures and Internal Controls for Sports Wagering, specifically 238.48: Expiration of Sports Wagering Tickets and Vouchers; Payment to the Sports Wagering Control Fund, for which a public hearing was held on October 28, 2025, at 9:30 AM EST.

This regulation was initially developed as part of the regulatory framework governing sports wagering in the Commonwealth, and is authorized by G.L. c. 23N, §§ 4, 6, 10, and 13. It is now being amended to enable an additional method by which funds from expired wagers may be paid to the Sports Wagering Control Fund.

205 CMR 238.48 governs the process by which sports wagering tickets and vouchers expire, and how those funds are transferred to the Sports Wagering Control Fund. Accordingly, this proposed regulation is unlikely to have a negative impact on small businesses.

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

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

It is not readily apparent that this regulation would affect small businesses, as it applies to payment methods utilized by licensed sports wagering operators to transfer funds from expired tickets and vouchers to the Sports Wagering Control Fund. Accordingly, there are no less stringent compliance or reporting requirements for small businesses.

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

This regulation establishes the process for transferring funds from expired wagers to the Sports Wagering Control Fund. As such, this proposed regulation does not impose any schedules or deadlines for compliance or reporting requirements for small businesses.

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

The regulation does not consolidate or simplify compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:
The proposed regulation prescribes less stringent design standards by providing flexibility to sports wagering operators in how they transfer funds from expired wagers in accordance with G.L. c. 23N § 13(h).
5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:
This regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth at this time.
6. Minimizing adverse impact on small businesses by using alternative regulatory methods:
This regulation is not likely to adversely impact small businesses.

Massachusetts Gaming Commission
By:

/s/ Autumn Birarelli
Staff Attorney
Legal Division

Dated: October 30, 2025



MEMORANDUM

TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Nathaniel Kennedy, Enforcement Counsel, IEB

CC: Caitlin Monahan, Director, IEB
Kathleen Kramer, Chief Enforcement Counsel/ Asst. Director, IEB
Justin Stempeck, Interim General Counsel

DATE: October 29, 2025

RE: Sports Wagering Noncompliance Matter

At the November 6, 2025 Public Meeting, the IEB will be presenting the following Sports Wagering Noncompliance matters to the Commission:

1. Bally's Interactive LLC, d/b/a Bally's ("Bally's"), Temporary Category 3 Sports Wagering Operator: This matter relates to Bally's offering wagering on Boston College football, outside of tournament play, in contravention of G.L. c. 23N, § 3, 205 CMR 247.01(2)(a)(2) and the Massachusetts Sports Wagering Catalog. Bally's accepted two (2) wagers on September 13, 2025, for a total stake of \$6.00.



Massachusetts Gaming Commission

October 31, 2025

RSM US LLP

The Commissioners
Massachusetts Gaming Commission
101 Federal Street, 12th Floor Boston, MA 02110

Re: Request for Conflict of Interest Waiver

Dear Commissioners:

On behalf of RSM US LLP ("RSM"), I am writing to formally request a waiver of the conflict of interest provisions, as outlined in our Statement of Work, to permit RSM to provide process improvement consulting to PENN Entertainment, Inc. ("PENN"), with respect to PENN's internal auditing and related accounting of horse racing revenues at ten (10) of their properties, including Plainville Gaming and Redevelopment LLC d/b/a Plainridge Park Casino ("PPC"), an MGC Licensed Entity.¹

Our firm's role would be strictly advisory, focused on providing PENN's internal auditors with recommendations to improve their internal audit processes; we would not be involved in performing audits, calculating revenues or preparing financial statements or tax reporting. Our services would involve evaluating current processes compared with leading practices and identifying potential process improvements through improved procedures and/or use of technology. This work is entirely unrelated to gaming operations, wagering systems, or any matter that would typically fall under the Commission's direct regulatory oversight concerning the integrity of gaming.

For additional context, the following summarizes RSM's services provided to the MGC relating to PENN and PPC:

- **PENN** – PENN has been licensed in the Commonwealth of Massachusetts since 2014, prior to RSM's engagement with the MGC. During our engagement, we performed high-level financial statement analysis based on PENN's public filings and summarized our observations in a subsection of a financial suitability report on Penn Sports Interactive, LLC ("PSI"), issued in January 2025. Horse racing revenues at specific properties/subsidiaries of PENN were not in the scope of our analysis and represent a minimal proportion of PENN's revenues. During our corporate governance analysis, we analyzed policies and procedures of PENN relating to cybersecurity when those policies were not available at the PSI level.
- **PPC** – PPC has also been licensed in the Commonwealth of Massachusetts since 2014, prior to RSM's engagement with the MGC. RSM evaluated the two Category 3 sports wagering operators tethered to PPC (PSI and Fanatics). We also performed industry market analysis during preliminary suitability, prior to sports wagering launch. Our scope of work did not include evaluating PPC's Category 2 Gaming License or its Live Racing License as those licenses were already issued at the time of our services.

¹ PENN is an entity qualifier to licensee Plainville Gaming and Redevelopment LLC d/b/a Plainridge Park Casino. PENN is also an entity qualifier for Category 3 Sports Wagering licensee Penn Sports Interactive, LLC.

We believe that granting this waiver is appropriate and justified for the following reasons:

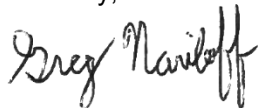
1. **Consistency with M.G.L. c. 23K:** The proposed services are focused on back-office process improvements. This work does not touch upon gaming integrity, security, or policy, and therefore granting the waiver is fully consistent with the purposes of the Massachusetts Expanded Gaming Act.
2. **No Interference with Commission Duties:** The services are functionally distinct from any work our firm performs for the MGC. To ensure no actual or perceived conflict arises, we will implement strict internal safeguards as stipulated in our agreement. Specifically, no team member performing work for the MGC will perform any work for PENN or PPC, and no MGC-related information will be made accessible to the PENN project team.
3. **No Adverse Effect on Public Interest:** The engagement is designed to provide recommendations to improve the efficiency and accuracy of PENN's internal financial reporting, which is a matter of good corporate governance. This work has no bearing on the fairness or integrity of gaming in the Commonwealth and, as such, does not adversely affect the public interest.
4. **Avoidance of Substantial Hardship:** As detailed in a previous correspondence and discussions, RSM is a large, diversified organization in which the team serving the MGC is a small component. One area in which our firm specializes is accounting process improvements, including subject matter expertise in casino and horse racing entities. Prohibiting us from providing these necessary, non-gaming-related services to a client would create a substantial hardship by restricting our ability to operate in a core area of our business and could negatively impact our reputation in the industry.

RSM adheres to comprehensive independence standards established by AICPA, PCAOB, SEC and other regulatory agencies for which RSM has established programs. Consistent with these programs, we only accept work that does not impair independence. Beyond independence, RSM has detailed procedures and mandatory training around real and perceived business conflicts.

As stipulated in our agreement, any individual providing services to the MGC would be strictly prohibited from performing services of any kind for MGC Licensed Entities. To ensure continued transparency and oversight, RSM will continue its monthly disclosure procedures with the IEB regarding new project opportunities.

We are fully committed to upholding the integrity of our relationship with the Commission. Should you grant these requests, we will adhere to all conditions and limitations imposed. Thank you for your time and consideration of this important matter. We are prepared to provide any additional information you may require.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Naviloff", written in a cursive style.

Greg Naviloff
Partner

RSM US LLP



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

FROM: Andrew Steffen – Compliance Operations Manager, Sports Wagering

MEMO: 10/1/2025
MEETING: 11/6/2025

RE: Update to Plainridge Park Casino House Rules

REGULATION BACKGROUND:

Pursuant to [205 CMR 247.02\(4\)](#), a Sports Wagering Operator shall not change or modify the House Rules without prior written approval of the Commission.

EXECUTIVE SUMMARY:

Plainridge Park Casino (PPC) has requested changes to their retail location house rules. A full detailed summary of changes can be found in the attached redline exhibit.

The summary of changes is as follows:

1. **General Rules:** Clarifies settlement for Same Game Parlays (SGPs), simplifies language for cancelled or postponed events, expands examples for Dead Heat settlement, and streamlines definitions for home/away/neutral site designations.
2. **Football:** Adds clarification for shortened games, refines language for First/Next Offensive Play markets, and introduces guidance for the “Drive Crosses X Yardline” market.
3. **Baseball:** Removes the 12-hour void provision, aligns settlement with innings-completion standards, modernizes terminology, and adds exceptions for Mercy Rule outcomes.



Sports Wagering Division

4. **Basketball:** Clarifies settlement for matches that end in a tie when no overtime is played.
5. **Boxing:** Adds language clarifying settlement conditions and result determination for match outcomes.
6. **Cricket:** Removes “Maiden in Match” and “Race to X Runs” markets, and introduces new guidance for combination bets where tied components result in a losing settlement.

CONCLUDING STATEMENT:

The Sports Wagering Division confirms all requirements have been met under 205 CMR 247.02 and recommends approving these changes.

3. Betting Props

21. During selected events, ESPN Bet will provide users with functionality to place bets combining outcomes and occurrences from the same event (aka Intra-Event Combinations), either through pre-established combinations present in its Sportsbook (excluding Enhanced Multiples, Boosted Odds, etc for which <Section B, Para 3, Clause 21> applies), or through the [BetBuilder] functionality. Such functionality is only present at ESPN Bet's sole discretion and without prejudice to related contingencies as described in <Section A, Para 5.5, 4>.
- ~~Settlement will be based on the respective Sport specific rules. All related occurrences must be fully accomplished for a bet to be considered as having happened and eventually paid out at the odds struck. Stakes refunded should any part of the combination be settled as VOID. All selections within an intra-event combination (Same Game Parlay (SGP)) will be settled according to the respective sport-specific rules. Should any selection be settled as VOID, all selections within that intra-event combination will be settled as VOID and stakes refunded.~~ Where applicable, should the combination feature any outcome the result of which ties exactly the chosen Over/Under or Spread line (aka PUSH), such part of the combination will be removed from settlement calculation and bets will be paid out taking into consideration only the other parts of the combination.

5. Result Settlement

- 3.) Occurrences which have not been sanctioned and/or acknowledged by the match/event officials (e.g. disallowed goals) will not be taken into account towards the settlement of the bet. ~~Unless otherwise stated in the betoffer, occurrences will be settled based on the time the related action is taken, not on the time when the occurrence was awarded.~~ As a general rule, and unless the offer specifies otherwise, ESPN Bet will settle offers based on the exact time that the flow of play was interrupted/resumed (as applicable) by the occurrence in question (e.g. ball went out of play for a throw in/goal kick or crosses the line for a goal), or play is interrupted by the referee, whichever is earliest. Occurrences are only considered ~~awarded~~ valid for settlement, if the subsequent related action is performed i.e. (Offside must result in a free kick, corners must be taken, and Goal kicks must be taken). Should the occurrence be only awarded and not taken, it will not be considered for settlement purposes.

7. ~~Bets on events that are cancelled, postponed or rescheduled more than 12 hours beyond their official start time will be void, unless otherwise specified in sport-specific rules or the specific betoffer. However, bets will remain valid under the following exceptions:~~

~~The event did not have an official start time confirmed by the relevant governing body at the time of bet placement.~~

~~The event is rescheduled for logistical or broadcast reasons but remains within the same competition round, and the sequence of official fixtures for all participants remains unchanged.~~

~~The start time is advanced, but the match still occurs within the same round, and the order of official fixtures is preserved. Past-posting and similar cancellation occurrences as defined in <Section A, Para 5.4> still apply.~~

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A fixture is no longer deemed part of the same matchday/round if, due to rescheduling, it is no longer the next scheduled official match for all participating teams. In such cases, affected bets will be VOID.

This rule does not apply to season or outright bets, which remain valid provided the competition is held and completed in the relevant season/year as displayed within the offer, regardless of scheduling changes.

For playoff or multi-leg series, individual match rescheduling does not affect bet validity provided the order of home/away fixtures is maintained and the match occurs within the series framework. Otherwise, bets are VOID.

7.—Unless otherwise stated either in the Sport-Specific rules or in conjunction with the bet offer, specific events forming part of tournaments/competitions which are not held, get postponed and/or rescheduled for a time/date longer than 12 hours from the last scheduled time issued by the governing body due to bad weather, crowd trouble or similar scenarios will be declared void with the following exceptions where bets will remain valid:

- a. Events which starting times have not been officially confirmed yet by the governing body at time of bet placement.
- b. Events which are moved due to scheduling conflicts/tv broadcasts but remain scheduled to be played within the same matchday/game week/round (as applicable) and the change does not change the order of official fixtures for any of the participants in the offer.
- c. Events which start times are anticipated (brought forward) but remain scheduled to be played within the same matchday/game week/round (as applicable) and, without prejudice to past-posting and similar occurrences as defined in <Section A, Para 5.4>, the change does not modify the order of official fixtures for any of the participants in the offer.

For the avoidance of doubt the definition of same matchday/game week/round is to be interpreted as the order of fixtures as dictated by the governing body with each specific match representing a matchday/game week/round. Should this order not be upheld and the sequence of fixtures changes in a way that matches against other teams get scheduled in between so much that the listed fixture ceases to be the next official commitment from that particular tournament/league/competition for all teams involved, that will be considered as not part of the same matchday/game week/round and offers will be declared void. The above does not apply to Season bets which will remain valid granted that the tournament/league/competition is held and decided during the season/year it refers to, regardless of any eventual date changes. In cases of Play-offs series or other series of matches which are scheduled to confront 2 teams over 2 or more matches, any re-scheduling of a single match will be considered as being part of the same matchday regardless of the length of the re-scheduling, granted that the order of home and away fixtures in the series is not modified and the listed fixture takes place within the series. Bets will be declared void otherwise.

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Simplified and clarified a number of implications within this rule regarding cancellations/postponements ("12 hour rule")

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14) **If two or more Participants share the applicable finishing positions and**

no odds have been offered for a drawn outcome, the payout will be calculated by dividing the odds by the number of participants sharing those certain positions and are settled accordingly. The payout will always be at least equal to the stake, except in cases of “Head to Heads”, see <Section B, Para 2.5> and <Section B, Para 5.19>.

13) If two or more Participants share the applicable finishing positions and no odds have been offered for a drawn outcome, the payout will be calculated using “Dead Heat” rules. The payout is calculated using the following equation;

Payout = Stake x (Odds ÷ Number of Participants Sharing the Certain Positions).

The payout will always be at least equal to the stake, except in cases of “Head to Heads.”, see <Section B, Para 2.5> and <Section B, Para 5.19>

Examples of Dead Heat rules settlements include, but are not limited to, the following instances (All calculations use decimal odds):

Example 1

You bet \$20 on a participant to finish in the Top 20 at odds 2.0. The participant finishes tied 16th with 5 other players. Payout would be calculated as follows:

2.0 x 5 = 10.0 (Original odds multiplied by number of places remaining in top 20)

10.0 ÷ 6 = 1.67 (10.0 taken from output of the calculation above, divided by number of players sharing the remaining places in top 20)

1.67 x 20 = 33.40 (New odds multiplied by stake)

Payout of \$33.40

Example 2

You bet \$10 on a participant to finish in the top 10 at odds 3.0. The participant finishes tied 10th with 3 other players. Payout would be calculated as follows:

3.0 x 1 = 3.0 (Original odds multiplied by number of places remaining in top 10)

3.0 ÷ 4 = 0.75 (3.0 taken from output of calculation above, divided by number of players sharing 10th place)

0.75 x 10 = 7.50 (New odds multiplied by stake)

Payout of \$10

Note here the payout computed is less than the original stake. As the rule states, payouts will always equal the stake except in cases of head to heads. In this example, the bet was not a head to head, and thus payout equals the stake of \$10.

Example 3

You bet \$10 on a participant to win his 3-ball at odds 2.40. The participant finishes tied for best score with 1 other player. Payout would be calculated as follows:

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$2.40 \div 2 = 1.20$ (Original odds divided by number of players who tied)

$1.20 \times 10 = 12.0$ (New odds multiplied by stake)

Payout of \$12

Example 4

You bet \$10 on a participant to win his 3-ball at odds 1.50. The participant finishes tied for best score with 1 other player. Payout would be calculated as below:

$1.5 \div 2 = 0.75$ (Original odds divided by number of players who tied)

$0.75 \times 10 = 7.50$ (New odds multiplied by stake)

Payout of \$7.50

Note here the payout is less than the stake. As the rule states, payouts will always equal the stake except in cases of head to heads. In this example, the bet was a head to head, and thus payout can be less than the stake.

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Clarification of Dead-Heat rule and expanding via practical examples

30) Should an event be moved from its originally announced venue and/or have its playing surface changed, this will not be treated as a cause for offers to be voided unless (i) the Sport-specific rules dictate such, and/or the new location in which the event takes place is the habitual "home" pitch of either participant involved in the match. Bets remain valid if the venue or surface changes, unless the sport's specific rules state otherwise or the event is moved to the regular home venue of one of the teams involved.

4) —

As a general principle, ESPN Bet will refer to the designation of 'Home' (host) and 'Away' (visitor) is determined by the governing body's official fixture list, not by the order teams appear on the betting interface the Home team (host) and the Away team (visitor) in accordance with the definition issued by the governing body for that particular match/competition. Bets on matches played on so-called "Neutral pitches" will remain valid, regardless of whether such information has been detailed in the bet offer and/or the positioning of the teams on the betting board/display. Furthermore, bets on matches at neutral venues remain valid regardless of how the teams are positioned in the betting display or whether neutrality is explicitly stated in cases where there is a discrepancy between the positioning of the teams/participants on the official website and their placement on the betting board/display, and such discrepancy causes a significant effect on the odds of the match/competition ESPN Bet will void the affected bets. Such

eventuality is contemplated only in cases where the discrepancy has a material and visible effect on the odds. For example, in cases of swapped Home and Away teams in an Ice Hockey match ESPN Bet will void the bets. Nevertheless ESPN Bet will consider valid bets placed on events where the so-called home-field advantage is not considered and in cases of neutral venues. Examples of such cases include but are not limited to tennis tournaments, MMA fights, singles competitions in general, or specific events such as the final/late stages of team competitions being held in pre-established venues, like the Superbowl, the NCAA Final 4 or the Italian Football Cup Final even if the location can be deemed as a potential customary "home" pitch for either of the teams involved. In such cases, said events will be considered as being played in neutral venues and all bets stand, regardless of the positioning of the teams/participants on the official website and their placement on the betting board/display. Home/Away designations will not affect bets in sports or events where venue doesn't provide any material advantage, such as, but not limited to, Tennis, UFC events or MMA fights. Similarly, events held at pre-determined venues such as the NCAA Final Four or the Super Bowl are considered neutral even if one participant/team is playing at a location or venue deemed as a potential 'Home' pitch, such as, but not limited to, the Super Bowl being held in LA with the LA Rams being one of the participants.

2. Football

4.) In NCAA matches, should the playing time of any quarter(s) be shortened by mutual agreement of the opposing head coaches and referee, this will not serve as grounds to void any bets. All bet offers will be settled as normal based off of the official result at the end of the match

- 11) First/Next Offensive Play markets are settled based on the first/next offensive play from scrimmage (as applicable), excluding Penalties. ~~Should a kick-off be returned for a touchdown, bets will be settled with the outcome of the subsequent kick-off.~~ For settlement purposes, incomplete/intercepted passes, ~~Quarterback sacks or fumbles~~ will be considered as "Pass Play" ~~unless the Quarterback has passed the line of scrimmage, at which point it would be considered as "Run Play".~~ Fumbles on exchanges to the Runningback will be considered as "Run Play". Quarterback sacks or fumbles will be considered as

“Pass Play” unless the Quarterback has passed the line of scrimmage, at which point it would be considered as “Run Play”. For NCAAF, Quarterback sacks or fumbles will be considered as “Run Play” in all situations.

~~4-22)~~ “Drive Crosses X Yardline” markets will be settled according to the spot of the ball at the end of the drive. If the drive ends in a Field Goal, the final yardline is the line of scrimmage of the field goal attempt. If the drive ends in a Fumble, the final yardline is the yardline where the fumble occurred. If the Drive ends in an Interception, the final yardline is the line of scrimmage of the play during which the interception occurs.

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5. Baseball

1) Unless otherwise stated, bets on Baseball are determined on the basis of the result after any eventual extra innings, and regardless of the amount of extra innings played, as declared by the respective organising body. In case of a draw after the eventual extra innings, match bets will be settled as void.

~~2) A bet is declared void on a cancelled or postponed match which has not started, or in the case of a result not having been issued within twelve hours of the scheduled start time.~~

~~4-2)~~ In the case of a shortened or abandoned match, “Match” bets (aka Moneyline) will be settled, as per the rules of the respective governing body. “Spread”, “Over/Under”, “Odd/Even” and all other markets, including player performance markets, but except Moneyline require all scheduled innings to be completed, or at least 8.5 innings to be completed if the home team is in advantage, for bets to stand. This applies to all offers except those the outcome of which has been decided prior to the abandonment and could not possibly be changed regardless of future events. These will be settled according to the decided outcome. For NCAA, exceptions will be made for matches that are shortened by mutual agreement of the opposing head coaches and referee or any “Mercy Rules” which come into play as stipulated by the relevant governing body. In case “Mercy Rules” are

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invoked, specified offers will be settled as follows:

- "Match Odds" – Settled as normal
- 'Handicap' and 'Total' offers – Void with the exception of offers the outcome of which has already been determined.

-
- ~~3) "Handicap", "Over/Under", "Odd/Even" and all other markets, including player performance markets, but except Moneyline require all scheduled innings to be completed, or at least 8.5 innings to be completed if the home team is in advantage, for bets to stand. This applies to all offers except those the outcome of which has been decided prior to the abandonment and could not possibly be changed regardless of future events. These will be settled according to the decided outcome:~~
- ~~4) During certain events ESPN Bet might decide to offer markets related to the outcome of a series of consecutive Regular Season matches playing between the listed teams during the specified timeframes. Settlement will include outcomes deriving from any doubleheaders as much as these are played within the specified timeframe. In cases where no drawn (tie) outcome has been made available for betting, bets will be settled as void should both of the listed teams win the same number of matches. All scheduled matches must be completed as per the rules of the governing body for bets to stand except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome:~~

6. Basketball

- ~~5)3) All 'match' bets on Basketball are determined on the basis of the final result, including potential overtime, unless stated otherwise. Matches that end in a tie where no overtime period(s) is played will have the "Match Odds" offer voided.~~

8. Boxing

- a. The following descriptions are to be considered as the applicable outcomes for the different scenarios:

“Finish”: A win by KO (Knockout), TKO (Technical Knockout), DQ (Disqualification),
“Throwing of the towel” from either fighters’ corner, Any referee stoppage which declares
either fighter as the only winner of the fight;
“Points/Decision”: Any win based on the judges’ scorecards;
“Unanimous decision”: A decision where all judges declare the same fighter as the
winner;
“Majority Decision”: A decision where the majority of the judges declare the same fighter
as the winner while the minority of the judges declare the fight as a draw;
“Split Decision”: A decision where the majority of the judges declare a particular fighter
as the winner while the minority of the judges declare the other fighter as the winner;
“Majority Draw”: A decision where the majority of the judges declare the fight as a draw
while the minority of the judges declare a particular fighter as the winner;
4. “Split Draw”: A decision where each of the judges’ scorecards declare
a different outcome of the fight and no outcome prevails over the other.

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a-b. If for any reason, the number of rounds in a fight is changed between the time of bet
acceptance and the actual fight, offers which make specific reference to rounds, such as
"Round betting", "Group of Rounds", "Over/Under", "Winning Method", "Alternate
winning round", "Alternate Winning group of rounds" and "To go the distance" will be
declared void.

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1. 6 For settlement purposes, betting on rounds or groups of rounds refers to a
fighter to win by KO (Knockout), TKO (Technical Knockout), or disqualification during
that round or group of rounds. If for any reason, a points decision is awarded before the full
number of scheduled rounds is completed (Technical Decision), offers such as "Alternate
Round Betting", "Group of rounds" and "Over/under" will be declared void, unless the
outcome is already determined.

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9. Cricket

General Cricket Rules

b. For "Maiden in Match" betting, a maiden is considered any over bowled with no runs
scored. Only completed overs with zero runs count. A minimum of 1 over must be bowled
for bets to stand. For settlement purposes leg-byes and byes are not applied to this bet offer,
as per the match scorecard.

13) Offers combining a number of occurrences by a specific player/team within a
match/event require that all connotations related to said offer be fully and unquestionably complied with. Should one
or more parts of the offer end in a tie, bets will be settled as LOST.

Player Cricket Rules

1) For "Race to X Runs" bets, both players must open the batting for bets to stand.



MASSACHUSETTS GAMING COMMISSION

To: Jordan Maynard, Chair
Eileen O'Brien, Commissioner
Brad Hill, Commissioner
Nakisha Skinner, Commissioner
Paul Brodeur, Commissioner

From: John Scully

Date: 11/6/2025

Re: MGC Diversity Update

Background:

This memorandum is to provide the Commission with a diversity update regarding the Massachusetts Gaming Commission's (MGC) Final FY25 numbers for diversity spend.

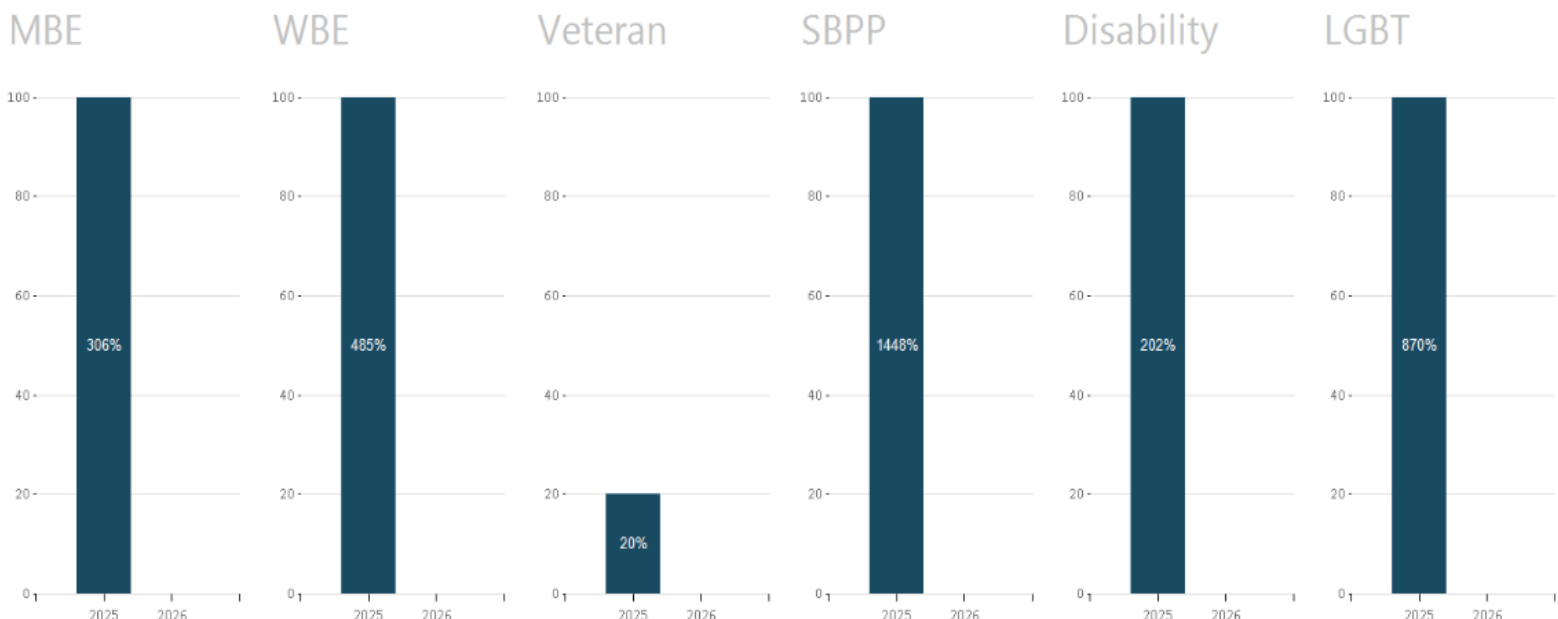
The Massachusetts Gaming Commission (MGC) has had a commitment to diversity since its inception as it has adopted OSD's policies for procurement. More recently, the Supplier Diversity Office (SDO) was established as its own state agency by Chapter 262 of the Acts of 2020, effective January 2021. The mission of SDO is to increase opportunities for certified businesses and small business through annual state agency benchmarks. As such the SDO independently sets the benchmarks and does the spend tracking for the Massachusetts Gaming Commission (MGC).

MGC Diversity Spend Update:

The following chart shows MGC's final spending status for FY25 across 6 spend categories. As you can see MGC far exceeded its benchmarks for all spend categories with the exception of VBE spending for FY25.

Secretariat: Massachusetts Gaming Commission

Department: Massachusetts Gaming Commission



The table below shows the benchmarks for FY25 MGC spending as prescribed by the Supplier Diversity Office (SDO). As you can see from the data, MGC met its benchmarks for the 2025 fiscal year for Disability Owned Businesses, LGBT Owned Businesses, Minority Owned Businesses, Women Owned Businesses, and the Small Business Purchasing Program. MGC continues working towards its Veteran Owned Business spend benchmark and significantly increased its spending from FY24 with a 63.18% increase in spending.

Fiscal Year	Department	Spending Category	Benchmark Amount	Direct %	Direct Payment
2025	MGC	Disability	\$21,946.29	201.83	\$44,294.84
2025	MGC	LGBTBE	\$21,946.29	869.99	\$190,931.34
2025	MGC	MBE	\$585,234.50	306.49	\$1,793,657.25
2025	MGC	SBPP	\$241,409.23	1447.79	\$3,495,088.75
2025	MGC	Veteran	\$219,462.94	20.18	\$44,294.84
2025	MGC	WBE	\$1,024,160.44	485.12	\$4,968,368.50



MASSACHUSETTS GAMING COMMISSION

To: Jordan Maynard, Chair
Eileen O'Brien, Commissioner
Brad Hill, Commissioner
Nakisha Skinner, Commissioner
Paul Brodeur, Commissioner

From: Dean Serpa, Executive Director
Derek Lennon, CFAO

Date: November 6, 2025

Re: MGC Fiscal Year 2026 Cost of Living Adjustments (COLAs)

Summary:

For FY26 the Executive Branch has announced COLAs for Managers and employees covered by collective bargaining agreements including a 2% increase implemented in July 2025 and a potential for an additional 2% in January 2026.

Historically, the Commission has closely aligned its actions with those of the Executive Branch regarding annual COLA increases.

Background: MGC FY25 Cost of Living Adjustments (COLA):

In January 2025, consistent with the Executive Branch, all non-union MGC staff received 3% FY25 COLAs. The Commission's approved COLAs for FY25 were retroactive to July of 2024, while the Executive Branch COLAs were not retroactive, covering only January 12, 2025 – June 30, 2025.

DISCUSSION:

A. MGC FY26 Cost of Living Adjustments (COLA):

In July 2025 the Commonwealth's Human Resources Division (HRD) implemented 2% FY26 COLAs for non-union employees. The Administration also presented a plan that would include an additional 2% FY26 COLA to be implemented in January 2026. The stated goal of this 4% increase (July 2% + January 2%) is to keep pace with the Executive Branch bargaining unit employees.

Due to Federal funding cuts and the Executive Branch hiring freeze, the second COLA for non-union employees (January 2026) has been suspended. See State House News Service: (<https://www.wvlp.com/news/massachusetts/healey-signs-60-9-billion-budget-vetoes-130-million/>).

As reported, the Executive Branch will remain in a hiring freeze for FY26, and the plans for the second 2% COLA in January for Executive Branch non-union personnel have been eliminated, saving \$17M and helping to alleviate budgetary pressures.

For MGC's FY 26 discussion, please note that the cancelled January 2026 COLA applies only to Executive Branch managers. Most Executive Branch non-managers -- those covered by collective bargaining agreements -- will receive a second January 2026 COLA increase as part of their collective bargaining agreement. See chart below for a sample of the CBAs scheduled to receive the January 2026 increase:

COLAs in Current Executive Branch CBAs			
Effective Date	Unit 2 AFSCME	Unit 3 NAGE Skilled Trades	Unit 6 NAGE
1/12/2025	3%	3%	3%
7/13/2025	2%	2%	2%
1/11/2026	2%	2%	2%
7/12/2026	2%	2%	2%
1/10/2027	2%	2%	2%

B. Eligibility Requirements: Executive Branch FY26 COLAs:

Below are the eligibility requirements and effective dates for the 2% Executive Branch COLA implemented on July 13, 2025:

- Managers must hold a management position on or before December 31, 2024.

The following individuals are not eligible for the July 13th COLA per HRD's guidance:

- Managers hired on or after January 1, 2025.
- Managers promoted into a management position from a non-management position who receive the July 13, 2025, collectively bargained increase.
- Managers in a terminated or terminated with pay status on July 13, 2025.
- Post-retirement appointments and Intermittent employees.

C. MGC Available Funding for FY26 COLAs:

On July 1, 2025, the Commission approved its FY26 budget, which allocated funding for a potential 3% COLA for all Commission employees in a non-union position. The table below demonstrates the COLA source funding by trust fund:

Appropriation	3% Budgeted
10500001 (Gaming Control Fund)	\$ 255,520.83
10500003 (Racing Oversight and Development Fund)	\$ 17,957.46
10500004 (Community Mitigation Fund)	\$ 9,469.89
10501384 (Sports Wagering Control Fund)	\$ 144,823.22
40001101 (Public Health Trust Fund)	\$ 16,226.82
Total 3%	\$ 443,998.22
	1% \$ 147,999.41

MGC FY26 COLA Options:

In past fiscal years, the MGC staff has advanced the position that it is important for the Agency to remain, at the very least, competitive with the Executive Branch, and when possible, to provide additional incentives for the purpose of employee retention and recruitment. While the Commission could consider no FY26 COLA to realize budgetary savings, the FY26 budget does currently contemplate a 3% COLA for all non-union staff.

Should the Commission wish to implement COLAs utilizing the budgeted 3% allocations, the following options could be considered:

- A. Provide a 2% COLA to all non-union MGC staff retroactive to July 13, 2025.
[This option matches Executive Branch treatment of only Executive Branch Managers.]
~\$215.5K

- B. Provide a 2% COLA to all non-union MGC staff retroactive to July 13, 2025 and implement a second 2% COLA effective January 11, 2026 to all non-union MGC staff.
[This option matches Executive Branch treatment of all employees covered by collective bargaining agreements.]
~\$325.3K
- C. Provide a 3% COLA to all non-union MGC staff retroactive to July 13, 2025.
[This option is in line with the Agency FY26 budget.]
~\$323.2K
- D. Provide a 2% COLA retroactive to July 13, 2025, for all non-union MGC staff and implement a second 2% COLA to non-union MGC staff in Grades 1-6 but not for Grades 7 and 8 (Grades 7 and 8 are MGC senior staff).
[This option mimics the combined treatment of Executive Branch Managers and Executive Branch staff covered by collective bargaining agreements.]
~\$298.2K.

Note that, regarding our unionized employees, their FY25 and FY26 COLAs will be implemented at the time of ratification of their bargaining agreement.

As additional considerations:

- 1. HRD is not recommending COLA increases for post-retiree employees. In FY24 and FY25, the MGC did include post-retirees in the staff awarded COLA increase.
- 2. HRD's guidance excluded managers hired on or after January 1, 2025, from receiving the July 13, 2025 COLA. Staff recommend that all non-union MGC employees hired on or before November 1, 2025, be eligible for the FY26 COLA.

Conclusion:

We request that the Commission authorize the Executive Director to implement one of the options above and provide FY26 COLA increases to non-union staff and post-retirees in their positions as of November 1, 2025.

MGC Commissioner Salaries

MGC Commissioner salaries, by statute, are tied to the Commonwealth's Secretary of Administration and Finance.

In FY25, MGC Commissioners received a 3% COLA, effective January 12, 2025, and did not receive the retroactive portion of the COLA covering the period from July 2024 to January 12, 2025 received by the MGC staff.

In FY 26, Commissioners received the 2% COLA awarded to Executive Branch managers in June 2025 and will not receive a second FY 26 COLA in January 2026, regardless of the option selected above for MGC staff.