



Massachusetts Gaming Commission Meeting Minutes

Date/Time: September 15, 2022, 10:00 a.m.
Place: Massachusetts Gaming Commission
 VIA CONFERENCE CALL NUMBER: 1-646-741-5292
 PARTICIPANT CODE: 112 818 2918

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

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

Chair Judd-Stein called to order the 393rd Public Meeting of the Massachusetts Gaming Commission (“Commission”). Roll call attendance was conducted, and all four commissioners were present for the meeting.

2. [Community Affairs Division](#) (00:38)

a. Community Mitigation Fund 2022 Boston Police Grant Reallocation

Community Affairs Division Chief Joe Delaney presented a request by the City of Boston to repurpose funds from their public safety grant. He explained that due to the City of Boston’s internal controls, the city could not apply the grant to a training that took place prior to the grant being awarded. He stated that the City of Boston wanted to reallocate the training funds and an additional \$2,125 of their authorized overtime to purchase \$12,000 of ballistic vests for their human trafficking unit. Chief Delaney recommended that the repurposing of funds be allowed. The *Community Mitigation Fund 2022 Boston Police Grant Reallocation Request* was included on pages 3 through 4 of the Meeting Packet.

Commissioner O'Brien moved that the Commission approve the City of Boston's request to reallocate funds from its 2022 public safety grant to provide \$12,000 for the purchase of ballistic vest carriers as included in the Commissioner's Packet and discussed here today. The motion was seconded by Commissioner Hill

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously.

3. [Discussion of Temporary Licensure for Sports Wagering](#) (4:12)

a. Discussion of Requirements for Temporary Licensure under G.L. c. 23N, §6(c)

Chair Judd-Stein stated that a potential outcome of implementing temporary licensing under G.L. c. 23N could require a dismantling process of ongoing betting operations who would not receive full operator's licenses, which could result in a destabilization of the new industry.

General Counsel Todd Grossman introduced Deputy General Counsel Caitlin Monahan and Attorney Mina Makarious from Anderson and Krieger. Deputy General Counsel Monahan and Attorney Makarious presented on the Commission's statutory and regulatory responsibilities related to sports wagering. The topics included an overview of the Commission's regulatory responsibility to regulate sports wagering; the responsibility to determine eligibility for licensure; the responsibility to deny or revoke a license; the licensee's responsibilities; temporary licensure per G.L. Chapter 23N; and the potential regulatory framework for temporary licensure. A memorandum regarding Discussion of Requirements for Temporary Licensure was included on pages 5 through 9 of the Meeting Packet.

Deputy General Counsel Monahan noted that the presentation combined this agenda item with other pre-launch considerations. Chair Judd-Stein expressed an interest in a more detailed discussion regarding technology issues. Commissioner O'Brien stated that she wanted more detail regarding the interplay between G.L. Chapter 23K and Chapter 23N. She stated that looking at G.L. Chapter 23N § 5(b), it seemed that temporary operators would have to be full operators, and that she was interested in further discussion regarding house rules. Deputy General Counsel Monahan stated that the Commission had discretion in determining which operator requirements temporary operators would need to abide by, but every operator requirement need not apply to temporary operators. Chair Judd-Stein stated that the definitions in the statute might need to be clarified, as she considered the term operator to refer to those with an operator's license and not a temporary license. Commissioner O'Brien stated that viewing statutory analysis would be necessary to address the operator's requirements in a temporary license setting.

Commissioner Skinner stated that the discussion related to temporary licenses felt premature as the temporary license operators would not be able to engage in sports wagering until operational requirements, such as house rules and technical standards, were met. She stated that she did not see utility in issuing temporary licenses without a process in place for creating a house rules model. Chair Judd-Stein stated that this meeting was to become educated on the temporary licensure process. Commissioner Skinner questioned whether operational requirements should exist before discussing temporary licensure. Chair Judd-Stein stated that operational requirements would be discussed. Attorney Makarious stated that operational requirements needed to be in place before any operations could commence. He stated that applicants would need to have their operational requirements reviewed, and there would be a step between being licensed and operating. Deputy General Counsel Monahan stated that operational requirements and the temporary licensure process could proceed on parallel paths.

Commissioner O'Brien stated that there is a distinction between a license and a certificate of operation present in the statute. Commissioner Skinner asked how the sections outlined in the presentation could be structured to align.

In response to Chair Judd-Stein's request for more information regarding the technology aspects, Executive Director Karen Wells stated that it is important for the public and operators to understand industry best practices. She stated that the technical aspect is enormous in sports wagering and is core to sports wagering's function. She explained that the current setup required potential operators to contract with certified independent test labs to ensure compliance with Massachusetts' technical standards. She stated that there was a temporary basis for reciprocity, where the potential operators could comply by providing technical compliance with a jurisdiction with similar regulations, and later file a GLI letter conforming to Massachusetts' standards within thirty days.

Executive Director Wells stated that there was also a technical standard for geofencing to ensure any sports wagering occurs within the boundaries of Massachusetts. She stated that there were issues of responsible gaming compliance related to Massachusetts directives. She stated that there was additional internal controls testing for sports wagering kiosks at retail sportsbooks. Chair Judd-Stein stated that the Commission should emphasize the acceptable expectations and model for temporary licensure and full operating licenses in the future, in addition to the expectation of suitability.

Commissioner O'Brien stated it would be helpful to receive more detail about the technology requirements for launching mobile sports wagering applications. Chair Judd-Stein noted that even in temporary licensing constructs there was still an expectation of suitability from potential operators. Executive Director Wells stated that the statute directive related to temporary licensure in G.L. Chapter 23N differs from G.L. Chapter 23K where there was not a directive to implement temporary licensure. She stated that casino gaming utilized a temporary process for suitability of primary vendors, and a similar process could be utilized for temporary sports wagering licensure instead of a complete nine-month suitability investigation.

Director of the Investigations and Enforcement Bureau Loretta Lillios stated that the process for temporary or provisional licensure with respect to gaming was not only used for primary

vendors, but secondary vendors, key employees, and gaming employees as well. She stated that there was an interim process for REIT transactions. She explained that it was a truncated security review intended to balance operational needs with the need to review for integrity purposes. She explained that it was a risk-based approach, and staff would develop criteria for this review to present to the Commission.

Executive Director Wells stated that internal controls and responsible gaming measures were critical due to the Commission's focus on protecting vulnerable individuals. She stated there would need to be a discussion related to the differences between mobile operators and retail operators, and that gaming agents were working with casino licensees regarding the location of their sportsbooks. Chair Judd-Stein clarified that the temporary licensing process is limited to mobile sports wagering operators. Executive Director Wells stated that all three categories of sports wagering operators could receive temporary licensing, but the specific provision in G.L. Chapter 23N § 6(c) related to mobile operators.

b. [Discussion regarding potential impacts of temporary licensure](#) (46:24)

1. Impacts on mobile/digital sports wagering operators

Executive Director Wells stated that operators tethered to category one and two licenses were different from untethered category three operators. She stated that upon review of the statute she identified significant potential impacts from implementing the temporary licensure of sports wagering. She explained that the statute allowed the Commission to award up to seven untethered category three licenses, but that there was not a cap on the number of temporary licenses the Commission could award.

Executive Director Wells stated that the Commission received a robust response from potential category three applicants and they might expect thirty entities to compete for the seven untethered category three licenses. She explained that each temporary license applicant was required to pay \$1 million, and that if a temporary licensed operator was awarded for a permanent operator's license that \$1 million would apply to the \$5 million license fee. She stated that there was not a mechanism to return the \$1 million to those who are not granted a full license. She stated that if each potential applicant was awarded a temporary license, 76% would be required to shut down operations once the Commission made the final determination on who would receive full sports wagering operations licenses. Executive Director Wells stated that the Commission would require a regulatory process for the shutdown of operators who were not rewarded a full operation license, and that there are concerns related to consumer protection during the shutdown period.

Executive Director Wells presented potential issues including money remaining in consumers accounts being returned upon shutdown; that the Commission's regulatory authority would be limited as the former operators would no longer be licensed; wagers placed for the future where the operator may shut down prior to the event; how entities ensure patrons are aware of the risk the platform may shut down; potential bonds or insurance to pay wagers in event of a shutdown; and what happens to the operator's patron list and personal financial information after shutdown. She stated that it would be beneficial to hear from potential applicants regarding how to proceed.

She stated that she was unaware of other jurisdictions who utilized this potential structure and did not have the benefit of other jurisdiction's experience.

Commissioner O'Brien stated that, in terms of temporary licensure, her interpretation of G.L. Chapter 23N § 6(d) was that prior to receiving an operator's license, the applicant's suitability would be investigated. She noted that the final number of untethered mobile sports wagering operators was up to seven, but could be zero. She stated an interest in protecting the public from the issues that occur in dismantling temporary operators.

Commissioner Hill stated that there was a potential issue of a temporary operator suing if they were not granted a full operational license and were forced to shut down, and stated concern that a lawsuit could stall the industry. Deputy General Counsel Monahan stated that while anyone could file a claim in court, the claim may not be valid. She stated that she did not believe there was a strong claim in the scenario presented by Commissioner Hill. General Counsel Grossman stated that a plaintiff would have to demonstrate a likelihood of success in order to stall the industry as a whole, and that it was unlikely as the Commission would have assured their processes were in accordance with Massachusetts law. Executive Director Wells stated that a creative claim may not be anticipated.

Commissioner Skinner stated that she wanted to avoid a scenario where a majority of the operators would close down, and that she was interested in exploring the legal authority of the Commission to limit temporary licenses to seven. She stated that given the general authority of the Commission in G.L. Chapters 23K and 23N, there may be room to interpret the authority of the Commission to limit the issuance of temporary licenses to prevent having to shut down operators. General Counsel Grossman stated that it was dependent upon how the Commission interpreted the language in G.L. Chapter 23N that discussed temporary licensure to understand the purpose of the process. He stated that the Commission would need to establish the purpose of the provision before limiting the temporary licensure, and that a competitive process was required. He stated that a competitive licensing process was lengthier than otherwise.

Chair Judd-Stein stated that the language in G.L. Chapter 23N mentioned timeliness, and that narrowing the potential temporary licensees down to seven would require the same suitability process required for full operator's licenses. Chair Judd-Stein stated that suitability could be included but it would add time. General Counsel Grossman stated that the process could be done in a truncated fashion that would not require full suitability. He also noted concern that if the number of temporary licenses was reduced, those who received temporary licenses would have advantage over others when applying for full licenses. Chair Judd-Stein stated that would likely result in duplicative efforts if there was a competitive process for temporary licensure. General Counsel Grossman stated that there would be overlap but overlap was not a dealbreaker, and that while it would extend the process it would only be a little longer, but not lengthy.

Commissioner Skinner expressed she would be comfortable with a truncated suitability review for a reduced number of seven temporary licensees, but would want more in-depth suitability if there was a larger number of potential temporary licensees. Executive Director Wells stated that the Commission would have to review and determine criteria for the competitive temporary process.

Commissioner Maynard raised concern about implementing a licensing construct that would saturate the market with temporary operators that would not ultimately receive category three licenses as it would create instability. He expressed interest in having category three licensure implemented as soon as possible to provide stability and focus on the long-term. Commissioner O'Brien stated she was worried about the lack of a sunshine provision, and that the Commission would need to address potential consequences of shutting down temporary operators. She stated that she had more confidence in the suitability of category one and two operators.

Chair Judd-Stein stated she struggled with the complexity in the statute that the temporary licensing pool was not limited by the legislature in the same way full operational licensing was. She stated she was unsure if the Commission had the legal authority to limit the number of entrants for temporary licensure. She stated that there would be a delay in conducting a competitive review at this stage, but the outcome of having to shutdown potential temporary operators and the potential fallout to customers was untenable. She stated that the operator's input at the roundtable the following week would be beneficial.

Commissioner O'Brien stated that she shared concerns, but there are options that mitigate the risk even if they are not perfect prior to a legislative fix. Chair Judd-Stein stated that customers would need to understand the potential that temporary operators may need to shut down at a later date. Chair Judd-Stein inquired if there was a possibility to reduce the group of potential operators without reducing it at the onset. General Counsel Grossman stated that the operators would require disclaimers or notifications to consumers regarding that status of each of the operations. He stated that linking the temporary licensing process with the permanent licensing process would be more fluid.

Lon Povich, Attorney from Anderson and Krieger, stated that the Commission has broad powers in the area. He explained that if there is a process for an untethered temporary license, part of the application process could require recipients to mitigate issues raised here. He stated that having to shut down temporary operators would be disruptive, but issues can be addressed by incorporating mitigation factors into the application.

Commissioner Skinner stated that it was reasonable to have the legal division research and analyze risks associated with limiting the number of temporary licenses granted to potential operators.

c. [Discussion on simultaneous vs. staggered launch](#) (1:31:43)

Executive Director Wells stated that an early competitive process for untethered mobile operators also affected whether the launch would be simultaneous or staggered. She stated that if there is added time to the licensing component, the Commission would have to address the issue of allowing parties to launch when ready or wait to launch at the same time. She stated that different jurisdictions have done both staggered and simultaneous, and there is precedent for each way. Chair Judd-Stein stated that the Commission would likely be more informed on the issue after the operators' roundtable in the following week.

Commissioner Hill asked approximately how long consumers would anticipate waiting for mobile sports wagering after the category one and two retail sportsbooks were allowed to operate. Executive Director Wells stated that the initial issue with a timeline was how truncated the suitability review would be for temporary licensure. She stated that significant work would be required in evaluating proposals which may take months if the competitive process was used to reduce temporary licenses granted. She stated that there was also the issue of allowing mobile sports wagering operators tethered to category one and category two licenses to operate prior to temporary licensure of category three operators, as they were two similar categories competing for the same market.

Chair Judd-Stein stated that the timeline can not be addressed due to the number of potential applicants for category three licenses, and additional input from operators regarding the temporary licensing procedure would be required. Commissioner Hill stated that while the Commission can't provide a timeline at this juncture, an expected timeline should be provided to the public soon as the Commission was facing criticism due to not releasing a general timeframe. Commissioner O'Brien stated that part of the reason a timeline had not been formed was due to the topics discussed in this meeting.

Executive Director Wells stated that some of the issues would be resolved by the cooperation and ideas presented by the potential licensees in the operators' round table on September 22, 2022. She stated that a relationship between the regulator and licensee can be helpful for understanding. Chair Judd-Stein stated that there might be more comfort amongst the potential operators regarding shutting down than the Commission anticipated. Commissioner Maynard stated that temporary licensure may be a red herring, and it may be more worthwhile to move along the full licensing process if temporary operators would enter and be removed from the market in under a year.

4. [MGC Preparations for Matters Related to Sports Wagering](#) (2:27:22)

a. Update on 205 CMR 238.00: House Rules

General Counsel Grossman stated that adjustments had been made to 205 CMR 238.03 to change language in accordance with past meetings. He stated that the regulation would return to the Commission shortly with additional regulations necessary for the commencement of sports wagering operations. The *Draft of Regulation 205 CMR 238.03 and Small Business Impact Statement* were included on pages 10 through 15 of the Commissioner's Packet.

b. [Process for Sports Wagering Test Lab Certification](#) (2:28:49)

Deputy General Counsel Carrie Torrisi explained that draft regulation 205 CMR 233.06 authorized entities certified as independent test labs for gaming equipment to be certified as independent test labs to provide certification for sports wagering equipment. She stated that staff recommended that the two existing certified independent test labs, Gaming Labs International (GLI) and BMM Testlabs (BMM), submit a petition for authorization for the Commission to review during the September 19, 2022, meeting. The *Draft of Regulation 205 CMR 244.06 and*

Small Business Impact Statement were included on pages 16 through 20 of the Commissioner's Packet.

5. [Horse Racing Application and Related Issues](#) (2:30:51)

- a. 205 CMR 2.01: new regulation governing the application for a new license for the conduct of horseracing, initial review of draft and Small Business Impact Statement

General Counsel Grossman explained that the draft regulation 205 CMR 2.01 codified the statutory directive that an application to conduct horse racing start a review process. He stated that the application reflected provisions of G.L. Chapter 128A and had been approved by the Commission at the September 12, 2022, meeting. He stated that the regulation had not been redlined as it was new. The *Draft of Regulation 205 CMR 2.01 and Small Business Impact Statement* were included on pages 21 through 26 of the Commissioner's Packet.

General Counsel Grossman explained that regulations regarding horse racing had additional administrative requirements regarding the promulgation of regulations under G.L. Chapter 128A § 9(b). He stated that the draft regulation must be submitted to the legislature for a sixty-day review process, and that it would extend the normal sixty-to-ninety-day promulgation process.

General Counsel Grossman stated that the emergency adoption of regulations in the context of horseracing must be designed to protect the health or safety of public participants or animals. Chair Judd-Stein asked how the Commission could reconcile the current regulation with the emergency requirements. General Counsel Grossman stated that the statute affords the Commission clear authority to release the application in the form done previously and that the application incorporates G.L. 128A. He stated that under G.L. 128A § 2. the Commission has authority to add additional questions to the application, as the regulation was simply intended to support the application in the future.

Chair Judd-Stein introduced Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian. Dr. Lightbown suggested a language change to clarify that the regulation addressed parimutuel wagering that was occurring on live racing, simulcasting, and advance-deposit wagering.

Commissioner O'Brien moved that the Commission approve the small business impact statement and draft of 205 CMR 2.01 as included in the Commissioners' Packet and as further discussed and edited here today, particularly noting Dr. Lightbown's edit 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, and further move the staff be authorized to modify chapter or section numbers or titles and to file any additional regulations as reserved or make any administrative changes as necessary to execute the regulation promulgation process. The motion was seconded by Commissioner Skinner.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously.

- b. [Discussion of impact of Massachusetts Sports Wagering Act on prospective new horse racing licensee\(s\) relative to mobile/digital sports wagering.](#) (2:42:40)

General Counsel Grossman stated that he was actively researching the effect of awarding a horse racing license under G.L. Chapter 128A vis-a-vis sports wagering. Chair Judd-Stein inquired as to whether the new application was available on the Commission website. Executive Director Wells stated that both the application for new applicants and renewals was available on the website. Chair Judd-Stein noted that the deadline for the application, including applications for renewal, is October 1, 2022. General Counsel Grossman stated that Plainridge Park Casino was the only renewal, and that sports wagering would not be an issue for them as they qualify for a category one sports wagering license.

- 6. [Commissioner Updates](#) (2:46:50)

- a. Plan for Sports Wagering Roundtable related to Mobile/Digital Sports Wagering Operators

Chair Judd-Stein stated that a roundtable for potential mobile sports wagering operators was scheduled for an in-person meeting on September 22, 2022, at the Massachusetts state house. She explained that in recognition of time constraints Executive Director Wells had created two questions which addressed consumer protections should temporary operators shut down and the operators' opinions on a simultaneous or staggered launch.

Commissioner O'Brien asked about the potential length of the meeting given each operator would have five minutes to address the Commission. Chair Judd-Stein stated that with the assumption that there would be thirty to forty operators present, the maximum length of the meeting would be three hours and forty-five minutes. Commissioner O'Brien stated that due to circumstances she would likely be remote and asked for twenty to thirty minutes for the Commissioner's to ask questions.

Commissioner O'Brien stated that the first question might be better suited for the Commission as the potential operators may not have appreciation for regulatory implementation. Executive Director Wells stated that the applicants may be worried about having their license pulled after paying \$1 million, and that potential licensees may want to expedite the final licensure process despite the structure in the statute requiring temporary licensure. Commissioner O'Brien stated that she wanted to narrow the questioning to avoid repetition in topics the Commission had already considered. Commissioner Maynard stated that the potential applicants may not want to apply for a temporary license knowing there would be a later competitive process for full

licensure and they would not be awarded a full operator’s license. Chair Judd-Stein stated that the roundtable would allow the Commission to learn the level of interest in the industry related to temporary licensing.

Commissioner Skinner expressed an interest in having time to hear the applicant’s concerns. Commissioner Hill stated that in his experience, the Commission would likely hear a theme of similar concerns from the operators. Chair Judd-Stein stated that due to the format it was harder to have a detailed conversation with the applicants, and that the Commission might require additional written comments or a virtual roundtable. Commissioner Skinner stated the Commission should communicate at the roundtable that the applicants would have an opportunity to submit written comments. The Commission edited the questions for the roundtable to address their concerns.

Chair Judd-Stein stated that an issue that arose in the responsible gaming roundtable was the Commission’s authority to regulate advertisements. Commissioner Maynard responded that it would be helpful to know the parameters of what the Commission can govern related to nationalized media. Chair Judd-Stein stated that the Commission could look into procuring a law firm with first amendment law experience. Commissioner O’Brien stated that there was also a difference between legal compliance and practicability of regulations being implementing. Commissioner Hill expressed it would be informative to invite national, regional, and local networks to explain how the commercials are implemented.

Chair Judd-Stein stated that while there is consensus related to the legal construct, there may be issues getting comment from various entities. Chief Financial and Accounting Officer Derek Lennon explained that fees under \$10,000 qualified for incidental one-time procurement. He stated that there were existing statewide contracts for legal services that could be utilized, and that the marketing firm contracting with the Research and Responsible Gaming Division could answer questions related to marketing. Chair Judd-Stein stated that the state law contract gave the Commission flexibility.

Chair Judd-Stein asked if the Commission could pick three industry experts or if there were concerns about the process. Attorney Povich stated that the Commission could invite parties to receive information, and there did not seem to be a conflict. He stated that different states have different requirements and national commercials typically had language riders included to address that. Chair Judd-Stein stated that the Commission had questions related to marketing but they needed to understand how markets work differently on a regional versus national level.

Hearing no other business, Chair Judd-Stein asked for a motion to adjourn.

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

Roll call vote:

<i>Commissioner O’Brien:</i>	<i>Aye.</i>
<i>Commissioner Hill:</i>	<i>Aye.</i>
<i>Commissioner Skinner:</i>	<i>Aye.</i>
<i>Commissioner Maynard:</i>	<i>Aye.</i>
<i>Chair Judd-Stein:</i>	<i>Aye.</i>

The motion passed unanimously. Meeting Adjourned.

List of Documents and Other Items Used

1. Notice of Meeting and Agenda dated September 12, 2022
2. [Meeting Packet](#) from the September 15, 2022, Open Meeting



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Plainridge Park Casino Request for Premium-Free
Period for 2023

Dear Commissioners:

As part of their Application for a License to Hold or Conduct a Racing Meeting in 2023, Steve O'Toole, Director of Racing, Plainridge Park Casino, included their requested premium-free period as part of Exhibit 27. This period is Sunday June 18, 2023 to Saturday September 9, 2023 in accordance with Massachusetts General Law 128C, § 2 (4).

Recommendation: That the Commission approves the Plainridge Park request for approval of their premium free period from Sunday June 18, 2023 to Saturday September 9, 2023.



Massachusetts Gaming Commission

EXHIBIT 27

Include as Exhibit 27 a master list of requested simulcast imports. A new form (“Licensee Request for Simulcast Import”) MUST be completed for EACH signal and submitted to the Commission no later than November 29 of each calendar year. Approval letters from the host racetrack’s regulatory authority and both representative horsemen’s groups must be on file with MGC by the close of business on the day prior to the first day of import.

IMPORT SIMULCAST SIGNALS

Notice of “Premium Free” Election

Plainville Gaming and Redevelopment, LLC identifies and elects the period from Sunday June 18, 2023 to Saturday September 9, 2023 as the period for “which no premium need be paid” for simulcast signals received in accordance with MGL 128C, section 2 (4). The remaining period subject to be paid as outlined in the premium provisions in 128C, section 2 (5).

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 27

- Ajax Downs, Canada
- Alameda County Fair, CA (Pleasanton)
- Aqueduct, NY
- Arapahoe Park, CO
- Arc de Triomphe, France
- Argentina Racing (Sky Racing World), Argentina
- Arizona Downs, AZ
- Assiniboia Downs, Canada
- Australia Racing (Sky Racing World), Australia
- Australia Greyhound Racing (Sky Racing World), Australia
- Bangor Raceway, ME
- Batavia Downs, NY
- Belmont Park, NY
- Belterra Park, OH
- Big Fresno Fair, CA (Fresno)
- Breeders' Cup, CA
- Breeders' Cup Future Wager, CA
- Buffalo Raceway, NY
- Cal Expo, CA
- Caliente Hipódromo Greyhound, Mexico
- California State Fair, CA (Sacramento)
- Canterbury Park, MN
- Century Downs, Canada (Harness Meet)
- Century Downs, Canada (Thoroughbred Meet)
- Century Mile, Canada (Harness Meet)
- Century Mile, Canada (Thoroughbred Meet)
- Charles Town, WV
- Churchill Downs, KY
- Clinton Raceway, Canada
- Colonial Downs, VA
- Dayton Raceway, OH
- Del Mar Thoroughbred Club, CA
- Delaware County Fair, OH
- Delaware Park, DE
- Delta Downs, LA (Quarter Horse Meet)
- Delta Downs, LA (Thoroughbred Meet)
- Dover Downs, DE
- Dubai World Cup, United Arab Emirates
- DuQuoin State Fair, IL
- Ellis Park, KY
- Emerald Downs, WA
- Evangeline Downs, LA (Quarter Horse Meet)
- Evangeline Downs, LA (Thoroughbred Meet)
- Fair Grounds Race Course, LA (Quarter Horse Meet)
- Fair Grounds Race Course, LA(Thoroughbred Meet)
- Fair Meadows at Tulsa, OK
- Fairmount Park, IL
- Fairplex Park, CA
- Finger Lakes, NY
- Flamboro Downs, Canada
- Fonner Park, NE
- Fort Erie Racetrack, Canada
- Fraser Downs, Canada
- Freehold Raceway, NJ
- French Racing (PMU), France
- Georgian Downs, Canada
- Golden Gate Fields, CA
- Grand River Raceway, Canada
- Grants Pass Downs, OR
- Gulfstream Park, FL
- Harrah's Philadelphia, PA
- Harrington Raceway, DE
- Hanover Raceway, Canada
- Hastings Racecourse, Canada
- Hawthorne Race Course, IL (Harness Meet)
- Hawthorne Race Course, IL (Thoroughbred Meet)
- Hiawatha Horse Park, Canada
- Hippodrome Trois-Rivieres, Canada
- Hong Kong Jockey Club, Hong Kong
- Hoosier Park, IN
- Horsemen's Park, NE
- Humboldt County Fair, CA (Ferndale)
- Illinois State Fair, IL
- Indiana Grand Racing Casino, IN
- Iowa Greyhound Association, IA
- Irish Greyhound Racing, Ireland (see attached list of tracks)
- Irish Thoroughbred Racing, Ireland (see attached list of tracks)
- Japan Racing (Sky Racing World), Japan
- Japan Racing (Woodbine), Japan
- Kawartha Downs, Canada
- Keeneland, KY
- Kentucky Derby Future Wager, KY
- Kentucky Derby Sire Future Wager, KY
- Kentucky Downs, KY
- Kentucky Oaks Future Wager, KY

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 27

Latin American Racing Channel Thru Gulfstream	Running Aces Harness Park, MN
Latin American Racing Channel Thru Laurel	Saudi Cup, Saudi Arabia
Latin American Racing Channel Thru Pimlico	Sam Houston Race Park, TX (Quarter Horse)
Laurel Park, MD	Sam Houston Race Park, TX (Thoroughbred)
Little Brown Jug Future Wager, OH	San Joaquin County Fair, CA (Stockton)
Lone Star Park, TX (Quarter Horse Meet)	Santa Anita Park, CA
Lone Star Park, TX (Thoroughbred Meet)	Saratoga Raceway, NY (Harness)
Los Alamitos, CA (Quarter Horse Meet)	Saratoga, NY (Thoroughbred)
Los Alamitos, CA (Thoroughbred Meet)	Scarborough Downs, ME
Louisiana Downs, LA (Quarter Horse Meet)	Scioto Downs, OH
Louisiana Downs, LA (Thoroughbred Meet)	Shenandoah Downs (Harness), VA
Malaysia Racing (Sky Racing World), Malaysia	Singapore Racing (Sky Racing World), Singapore
Mahoning Valley Race Course, OH	Sonoma County Fair, CA (Santa Rosa)
Melbourne Racing Club, Australia	South Africa Racing, (Sky Racing World) South Africa
Meadowlands, NJ	South Korea Racing (Sky Racing World), South Korea
Miami Valley Gaming, OH	Southland Greyhound Park, AR
Mohawk Racetrack, Canada	Suffolk Downs, MA
Monmouth Park, NJ	Sunland Park, NM
Monticello Raceway, NY	SunRay Park, NM
Moosomin D&E @ Marquis Downs, Canada	Tampa Bay Downs, FL
Mountaineer Park, WV	The Downs at Albuquerque, NM
New Zealand Racing (Sky Racing World), New Zealand	The Meadows, PA
Northfield Park, OH	The Red Mile, KY
Northville Downs, MI	Thistledown, OH
Oak Grove Racing, KY	Timonium Fair, MD
Oaklawn Park, AR	Tioga Downs, NY
Ocean Downs, MD	Tri-State Greyhound Park, WV
Parx Racing, PA	Turf Paradise, AZ
Penn National Race Course, PA	Turfway Park, KY
Pimlico, MD	UK Thoroughbred Racing, United Kingdom (see attached list of tracks)
Pocono Downs, PA	UK Greyhound Racing, United Kingdom (see attached list of tracks)
Prairie Meadows, IA	Valley Race Park, TX
Presque Isle Downs, PA	Vernon Downs, NY
Red Shores Charlottetown, Canada	Virginia Gold Cup Races, VA
Red Shores Summerside, Canada	Western Fair Raceway, Canada
Remington Park, OK (Quarter Horse Meet)	Wheeling Island Greyhound, WV
Remington Park, OK (Thoroughbred Meet)	Will Rogers Downs, OK (Quarter Horse Meet)
Retama Park, TX (Quarter Horse Meet)	Will Rogers Downs, OK (Thoroughbred Meet)
Rideau Carleton Raceway, Canada	Woodbine, Canada (Harness Meet)
Rillito Park, AZ	Woodbine, Canada (Thoroughbred Meet)
Rosecroft Raceway, MD	Yonkers Raceway, NY
Ruidoso Downs, NM	Zia Park, NM

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 27

UK THOROUGHBRED TRACKS

Ascot
 Bath
 Brighton
 Chelmsford City
 Chepstow
 Doncaster
 Exeter
 Fakenham
 Ffos Las
 Fontwell
 Yarmouth
 Hereford
 Hexham
 Kelso
 Leicester
 Lingfield
 Newcastle
 Newton Abbot
 Perth
 Plumpton
 Ripon
 Windsor
 Sedgefield
 Southwell
 Stratford
 Taunton
 Towcester
 Uttoxeter
 Wolverhampton
 Worcester
 Aintree
 Ayr
 Bangor-on-Dee
 Beverley
 Carlisle
 Cartmel
 Catterick
 Chester
 Cheltenham
 Epsom
 Goodwood
 Hamilton Park
 Haydock Park
 Huntingdon

Kempton Park
 Ludlow
 Market Rasen
 Musselburgh
 Newbury
 Newmarket
 Nottingham
 Pontefract
 Redcar
 Salisbury
 Sandown Park
 Thirsk
 Warwick
 Wetherby
 Wincanton
 York

IRELAND THOROUGHBRED TRACKS

Ballinrobe
 Bellewstown
 Clonmel
 Cork
 Curragh
 Downpatrick
 Down Royal
 Dundalk
 Fairyhouse
 Galway
 Gowran Park
 Kilbeggan
 Killarney
 Laytown
 Leopardstown
 Limerick City
 Listowel
 Naas
 Navan
 Punchestown
 Roscommon
 Sligo
 Thurles
 Tipperary
 Tramore
 Wexford

UK GREYHOUND TRACKS

Central Park
Crayford
Doncaster
Harlow
Henlow
Monmore Green
Romford

IRELAND GREYHOUND TRACKS

Cork
Kilkenny
Waterford (aka Kilcohan Park)
Limerick
Mullingar
Tralee
Youghal



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Plainridge Park Casino Request for Simulcast
Export Locations for 2023

Dear Commissioners:

As part of their Application for a License to Hold or Conduct a Racing Meeting in 2023, Steve O'Toole, Director of Racing, Plainridge Park Casino, included their list of requested simulcast export locations as Exhibit 28.

Recommendation: That the Commission approves the Plainridge Park request for approval of the simulcast export locations listed as Exhibit 28 in their Application for a License to Hold or Conduct a Racing Meeting in 2023.



Massachusetts Gaming Commission

EXHIBIT 28

Include as Exhibit 28 a master list of requested simulcast export outlets with this application. Such list should identify all secondary, satellite, and/or guest sites serviced by the primary outlet. In addition, a new form (“Licensee Request for Simulcast Export”) MUST be completed for each signal and submitted to the Commission, along with an approval letter from the applicant’s representative horsemen’s group, no later than 30 days before the first scheduled day of the live race meet.

EXPORT SIMULCAST SIGNALS

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Guest and Secondary Sites	Customer Code
AmWest Entertainment (OTB's and ADW)	
Triple Crown (South Dakota)	NSC
The Greenbrier Resort (West Virginia)	GBR
Coeur D'Alene Casino (Idaho)	WRL
AmWest Accounts	AWA
AmWest Entertainment	AWE
AmWest Web Services	AWS
AmWest Ent. Group 1	AW1
AmWest Ent. Group 2	AW2
AmWest Ent. Group 3	AW3
AmWest Ent. Group 4	AW4
AmWest Ent. Group 5	AW5
Arapahoe Park (Colorado)	
Big Ds OTB at Whiskey River	BDW
ES2 at The Block CS	CSE
Celtic on Market OTB	CTO
Elevations at Union Station CS	ECS
Fox and Hound P6 Lone Tree	FHP
Grand Junction OTB	GJO
Havana Park	HAV
Mardi Gras Black Hawk	MGC
Mirage Sports Littleton	MSL
Post Time OTB	PTT
Southern Colorado Gaming - Pueblo	PUE
Odds On OTB Arvada	SCY
Sundance Steakhouse and Saloon	SUS
Ultimate Sports Golden	USG
Arima Race Club (Trinidad)	
Park Street Betting Shop	AR1
St. James OTB	AR2
Curepe OTB	AR3
Santa Rosa Park OTB	AR4
Keate Street OTB	ARK
Union Park OTB	ARU
Arima OTB	ARA
Chaguanas OTB	CHA
Assiniboia Downs (Manitoba, Canada)	
Club Regent Teletheatre	CBR
Central Hotel	CEN
Green Brier Inn	GBI
McPhillips St Station Teletheatre	MSS
Pembina Hotel	PMX
Quest Inn	QIN
Windsor Park Inn	WPI
Assiniboia Downs Handicap	HXS
Assiniboia Downs TAB (Canadian Residents Only)	TSD
Atlantic City Casinos (New Jersey)	
Borgata Casino	BRG

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Bangor Raceway (Maine)	BAN
Belterra Park (Ohio)	BEP
BetMakers DNA Pty LTD (International Fixed Odds Wagering) Global Racing Network	
Birmingham Race Course (Alabama)	BHM
Victoryland Greyhound (Alabama)	VLD
Buffalo Raceway (New York)	BUR
Canterbury Park (Minnesota)	CBY
Capital District Off-Track Betting Corporation (New York) Capital Internet & Phone Wagering	
Catskill Off-Track Betting Corporation (New York) Catskill Internet & Phone Wagering	CAR
Century Downs (Alberta, Canada) Century Downs on-track	CED
Century Mile (Alberta, Canada) Backstreet Pub & Pizza	BTP
Century Casino Calgary	CC1
Medicine Hat Lodge	MHL
Olds Hotel CB	OHC
Ricky's Douglas Square	RAG
Rookie's Lounge	ROK
Schanks North	WU2
RMTC Airdrie Theatre	WUA
Elbow River OTB	WUE
Five Star Bingo	WUF
Stoney Nakoda Resort & Casino	WUN
RMTC Okotoks	WUO
Schanks 1 OTB	WUS
Barney's Bar & Grill	BAA
Beverly Crest Games Room	BCG
LaBiche Inn	BCH
Billy Budd's	BIB
Best Western Denham Inn	BWD
BW Regency Inn Airdrie	CEA
Elbow River Casino Calgary	CEB
Century Casino Edmonton	CEC
Medicine Hat Lodge	CEF
Rockies Rocky Mountain House	CEG
Royal Duke Okotoks	CEH
Stoney Nakoda Resort Morley	CEI
Norsemen Inn Camrose	CEJ
Century St. Albert	CES
Continental Inn	COI
Central Suite Hotel	CSH
Century Mile on-track	CMR
Dom's Gastropub Slave Lake	DOM
Dover Hotel	DVH
Evergreen Park Casino	EGP
Eagle River Casino	EGR

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Franklin's Inn	FKI
Franco's Pub	FRP
Good Buddy Sherwood Park	SPJ
Grove Motor Inn	GMI
Longshots	LGS
Post Time at Fitzgeralds	PAF
River Cree Resort & Casino	RIC
Ruths Cold Lake NP	RLI
Rosslyn Inn & Suites	ROI
Schanks Athletic Club Edm	SCH
Santo's Restaurant & Lounge	SRL
The Sawridge Inn	TSI
Charles Town Races (West Virginia)	CTR
Colonial Downs (Virginia)	CLD
Rosies at Vinton	HP1
Rosies at Richmond	HP2
Rosies at Hampton	HP3
Rosies at Chesapeake	HP4
Horseplay Breakers Henrico	HP5
Horseplay Ponies&Pints Richmond	HP6
Horseplay Buckets Chesapeake	HP7
Horseplay Windmill Collinsville	HP8
Rosies at Dumfries	HP9
Columbus Races (Nebraska)	CLS
Corpus Christi Greyhound Racing (Texas)	CPC
Day At The Track (ADW)	DAT
Dayton Raceway (Ohio)	HGD
Delaware Park (Delaware)	DEL
Delta Downs (Louisiana)	DLT
DerbyWars (Handicapping Contest, Non-Wagering Site)	
Downs at Albuquerque (New Mexico)	ALD
Dover Downs Raceway (Delaware)	DOV
eBet Technologies Inc. (ADW)	EBT
HorsePlayersBet.com/eBet	HPB
HarringtonBets.com/eBet	HTB
Compubet.com/eBet	CUB
AustralianRacingbets/eBet	OZB
MutuelsOnline.com/eBet	MOL
RaceUwin.com/eBet	RUW
WagerLiveRacing.com/eBet	WLR
123Bet.com	E23
Winia EBet	WIA
Elite Turf Club (ADW)	
Elite Turf Club - Office 10	ETA
Elite Turf Club 11	ETB
Elite Turf Club 12	ETC
Elite Turf Club 2	ETD
Elite Turf Club 13	ETE
Elite Turf Club 14	ETF

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Elite Turf Club 15	ETG
Elite Turf Club 16	ETH
Elite Turf Club 17	ETI
Elite Turf Club 18	ETJ
Elite Turf Club 19	ETL
Elite Turf Club 20	ETM
Elite Turf Club 21	ETN
Elite Turf Club 22	ETQ
Elite Turf Club 23	ETR
Elite Turf Club 24	ETS
Elite Turf Club 25	ETT
Elite Turf Club 26	ETU
Elite Turf Club 1	ET1
Elite Turf Club - Office 3	ET3
Elite Turf Club - Office 4	ET4
Elite Turf Club - Office 5	ET5
Elite Turf Club - Office 6	ET6
Elite Turf Club - Office 7	ET7
Elite Turf Club - Office 8	ET8
Elite Turf Club - Office 9	ET9
Emerald Downs (Washington)	EMD
Washington Offtrack Locations	WOF
Evangeline Downs (Louisiana)	EVD
Eunice OTB	EUN
Races and Aces-Henderson	HEN
St. Martinville OTB	SMV
Fair Grounds (Louisiana)	FRG
Finish Line #2 - Covington	FLA
Finish Line #3 - Slidell	FLB
Finish Line #4 - Gretna	FLC
Finish Line #6 - Houma	FLD
Finish Line Elmwood	FLE
Finish Line #7 St.Bernard	FLF
Finish Line Kenner	FLQ
Finish Line Metairie	FLR
Finish Line LaPlace	FLS
Finish Line Thibodaux	FLT
Slidell FG OTB	FLU
Finish Line Westwego	FLW
Destrehan OTB	FLY
Meraux OTB	FLX
LaPlace OTB	FLZ
Fairgrounds Acct. Wagering (LA Residents Only)	FAW
Fair Meadows (Oklahoma)	FMT
Favorites at Gloucester Township (New Jersey)	FGC
Finger Lakes (New York)	FIL
FingerLakesBonusBets.com	FGL
Fonner Park (Nebraska)	FON
Fort Erie Race Track (Ontario, Canada)	FOE

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Fraser Downs, Hastings Park, BC Teletheatres (British Columbia, Canada)	
Fraser Downs	FRD
Hastings Park	HST
TBC Castlegar Chances	CBH
TBC Chilliwack Chances	CCH
TBC Duncan Chances	CIW
TBC Prince Rupert Chances	CPR
TBC Sechelt Gilligans	GGP
TBC Vernon LCC	KAH
TBC Kamloops Chances	KAM
TBC Maple Ridge Chances	MRP
TBC Penticton Clancys	PIN
TBC Squamish Chances	SFI
TBC Salmon Arm Chances	SHS
TBC Prince George TCC	TNH
TBC New Westminster SC	TBA
TBC Richmond RRC	TB1
TBC Cranbrook COTR	TB2
TBC Nanaimo	TB3
TBC Surrey DBG	TB4
TBC Victoria Playtime	TB5
TBC Kelowna Chances	TB6
TBC Coquitlam HCC	TB7

Freehold Raceway (and New Jersey OTB)	FHR
Favorites at Tom's River	TOM

Game Play Network (ADW)	
Game Play Network ADW	ODY
Game Play Network Oddz	ODZ

Global Wagering Group, LLC (ADW)	
Global Wagering Group	GWG
Global Wagering 01	G01
Global Wagering 02	G02
Global Wagering 03	G03
Global Wagering 04	G04
Global Wagering 05	G05
Global Wagering 06	G06
Global Wagering 07	G07
Global Wagering 08	G08
Global Wagering 09	G09
Global Wagering 10	G10
Global Wagering 11	G11
Global Wagering 12	G12
Global Wagering 13	G13
Global Wagering 14	G14
Global Wagering 15	G15
Global Wagering 16	G16
Global Wagering 17	G17
Global Wagering 18	G18
Global Wagering 19	G19

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Global Wagering 20	G20
Global Wagering 21	G21
Global Wagering 22	G22
Global Wagering 23	G23
Global Wagering 24	G24
Global Wagering 25	G25
Global Wagering 26	G26
Global Wagering Solutions (International ADW)	
Andalucia AHDI	AND
GWS German Tote	GGT
International Betting Association Ltd	GOX
Magna Bet	MAB
Pferdewetten.de GmbH	GPW
Racebets	GRR
Scientific Games Racing BV	GSN
Betsson	GWB
GWS - SBO B to B	GSB
GWS - SBO B to C	GSC
GWS Stan James	GSJ
GWS Boylesports	GBS
GWS Ladbrokes Australia	GLQ
Irish Tote	HRI
GWS Coral LC Int.	GCO
GWS Ladbrokes LC Int	GLU
Greyhound Park at Post Falls (Idaho)	
	CAO
Harrah's Philadelphia (Pennsylvania)	
TVG - Harrahs Chester Downs	HCR
TVG Group 8	TVH
	TV8
Harrington Raceway (Delaware)	
	HAC, HAL
Hawthorne Race Course (Illinois)	
Aurora OTB	HAW
Bloomington OTB	AUR
Corliss OTB	BLO
Crestwood OTB	CSO
Evergreen Park OTB HRC	CST
MQ's Sports Bar OTB	EPK
Green Oaks Sports HRC	EPO
Salernos Sports Hodgkins HRC	GOS
Shark City OTB	HOD
Players Club OTB	HWG
Joes on Weed Street HRC	HWP
Joliet OTB	JOE
Lansing OTB	JOO
McHenry OTB HRC	LNS
Mokena OTB	MHN
North Aurora OTB HRC	MOK
Oakbrook Terrace OTB	NAO
Furlongs at Ottawa	OKT
Peoria OTB	OTA
	PEO

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Rockford Shooters HRC	RSG
Villa Park Sportsbar HRC	VIL
Fairmount Park	FPK
Club Hawthorne AW (IL Residents Only)	HWA
Hiawatha Horse Park (Ontario, Canada)	HHP
Hipicia Presidente Remon - Codere (Panama)	
Panama	PAN
Panama OTB Agents	POA
LA Kelvin OTB	POB
Panama Turf OTB's	PTO
Panama Phone Bet	PPB
Hipodromo de Agua Caliente (Separate Pool)	
Hoosier Park (and Indiana OTB's)	HPG
Fort Wayne OTB	FWG
Indianapolis OTB	IAG
Merrillville OTB	MEG
Horse Racing New Brunswick (Canada Tracks & OTB's)	
Exhibition Park Raceway	EPR
Fredericton OTB	FSA
Horseshoe Sports Pub	HSP
KV Billiards Quispamsis	KVQ
Horsemen's Park (and Nebraska outlets)	NEB
Lincoln Race Course	LRC
Horseshoe Casino Council Bluffs	BLF
HorseTournays (Handicapping Contest, Non-Wagering Site)	
Indiana Downs (and Indiana OTB's)	IDS
Clarksville OTB	IOC
Intermountain Racing & Entertainment (Idaho Track, OTB, ADW)	
Sandy Downs	TET
The Turf Club at Fort Hall Casino	TCC
Idaho Falls OTB	IFO
Idabet.com	IDB
Iowa Greyhound Association (Iowa)	IGA
Wild Rose Clinton	IG1
Wild Rose Emmetsburg	IG2
Wild Rose Jefferson	IG3
Jockey Club do Rio Grande do Sul - Codere (Brazil)	
Turff Azenha	AZE
Cristal Hipodromo Porto Alegre	BRA
HC Caxias do Sul Centro	CAX
HC Charqueadas Centro	CQD
HC OTB Elise Pacheco	EPA
Jose Do Patrocinio	JDP
Moinhos De Vento	MOI
Suaposta Niteroi	NIT
HC OTB Paim Apostas	PAI
Cristal Porto Alegre	RGR
Turff Santana	SAA
Sumatra Eireli Londrina	SEI

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Codere Suaposta	SUA
Taruma Hipodromo	TAR
Las Vegas Dissemination Company	
Foxwoods Casino (Connecticut)	FXC
Cities of Gold Sports Bar (New Mexico)	POJ
Meskwaki (Iowa)	MSK
Megatote (ADW)	MGT
Lewiston Raceways, Inc.	
Newport Jai Alai (Rhode Island)	NJA
Winner's Circle OTB (Maine)	LEW
Lien Games Racing, Inc. (North Dakota OTB's and ADW)	
Chips Lounge & Casino	LGC
Skydancer Casino	SKY
Rumors	LGR
Turf Room OTB	LGE
OTB.Com Phone	LGA
HOJO OTB	LGM
CW Technologies US	CWU
Lien Games OT.com NY	LGY
Lien Games CA Internet	LG2
Luckys OTB Bismarck	LG3
Lien Games Potent Systems	LG4
Lien Games QuantumBet	LG5
LG RushBetWin CA	LG6
Veggie Plus OTB St. Thomas LGR	LG7
Lien Games Internet Wagering	LIW
Lien Games Internet Wagering 2	LI2
Lien Games Internet Wagering 3	LI3
Lien Games Internet Wagering 4	LI4
Pickthewinner.com	LI5
PlayUp Rush LGR	LP1
PlayUp RushCA LGR	LP2
Wager2win	L2W
OffTrackBetting.com	L3W
X The Spot OTB LGR	XTS
Lone Star Park (Texas)	
	LSP
Louisiana Downs (Louisiana)	
Harrahs Louisiana Downs OTB	LAD
	LDT
Mahoning Valley Race Course (Ohio)	
	MVR
Marquis Downs (Saskatchewan, Canada)	
Lucky's Bar & Grill Teletheatre	MAQ
Seven Oaks Regina	LBT
Sports On Tap	SOI
	SOT
Maryland Jockey Club (Laurel, Pimlico, Rosecroft, and Maryland OTB's)	
Riverboat OTB	MJC
Horseshoe Baltimore Casino	LLE
Boonesboro OTB	LLE
Timonium OTB	LLE
Perryville OTB	LLE

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Greenmount Station OTB	LLE
MGM National Harbor OTB	LLE
Frederick OTB	LLE
MJC On-Track Accounts	MJN
Rosecroft Raceway	ROR
Meadowlands Racetrack (New Jersey)	MED
Winners Bayonne	BAY
The Meadows (Pennsylvania)	MEA
Meadows Acct Wagering	MAW
Miami Valley Gaming and Racing (Ohio)	MVG
Midcoast OTB, Inc.	
Winners OTB (Maine)	BRU
Mississippi Off-Track Wagering (Mississippi)	
Harlow's Casino	HLW
Riverwalk Casino	RVW
Monmouth Park (New Jersey)	MTH
Favorites at Woodbridge	WOB
Favorites at Hillsborough	FHO
Jamie's Bar	JMB
NJ ADW-Online	NJ1
NJ ADW-Mobile	NJ2
NJ ADW-IVR	NJ3
Monticello Raceway (New York)	MRA
Mountaineer Park (West Virginia)	MNR
Nassau Regional Off-Track Betting Corporation (New York)	
Nassau Internet & Phone Wagering	
New York Racing Association (New York)	NYR
NYRA Acct Wagering	NYA
NYRABets	NYB
NYRA Bets IL	NBI
NYRA Bets CA	NBW
NYRABets National 1	NA1
NYRABets National 2	NA2
BetMGM NYRABets OR	BMO
BetMGM NYRABets IL	BMI
BetMGM NYRABets CA	BMC
Northfield Park (Ohio)	NPK
Cedar Downs OTB	CDR
Northville Downs (Michigan)	NOR
Oak Grove Racing (Kentucky)	OGG
Oaklawn Park (Arkansas)	OPA
Oaklawn Park Account Wagering	OPT
Ocean Downs (Maryland)	OCD
Oregon Off-Track Wagering (Oregon)	
Alexander Sports Fairview	ASB
Capital Cantina Salem	CLC
Emerald Lanes Eugene	ELU
Speakeasy Oswego	KEK
Lava Lanes Bend	LLB

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Lava Lanes of Medford	LLM
Rainier OTB	RAI
Rialto	RIA
Rialto Killingsworth	RKI
Stadiums Milwaukie	SMO
Ten Downs Lanes Roseburg	TDL
Tom's Bar Portland	TMS
Trackstir's	TRK
PariBet US (ADW)	PBU
PariBet 1	PB1
PariBet 2	PB2
PariBet 4	PB4
Parx Racing (Pennsylvania)	PHA
Parx Malvern Race & Sportsbook	MAV
South Philadelphia Turf Club	SPO
Philly Park Internet	PHI
Philly Park Phonebet	PHP
Philly Park IVR	PVR
Egg Harbor Turf Club (New Jersey)	EHT
Penn ADW, LLC (ADW)	ACX
Penn National Race Course (Pennsylvania)	PEN
Off-Track Wagering York	YRK
Hollywood Casino Morgantown	MRG
Penn National Account Wagering	ACW
Player Management Group (ADW)	PMG
Player Management Group A	PMA
Player Management Group B	PMB
Player Management Group C	PMC
Player Management Group D	PMD
Player Management Group E	PME
Player Management Group F	PMF
Player Management Group H	PMH
Player Management Group I	PMI
Player Management Group J	PMJ
Player Management Group K	PMK
Player Management Group L	PML
Player Management Group N	PMN
Player Management Group O	PMO
Player Management Group P	PMP
Player Management Group Q	PMQ
Player Management Group R	PMR
Player Management Group V	PMV
Pocono Downs (Pennsylvania)	POC
Pocono Downs OTB	POT
Pocono Downs Account Wagering	PAW
Pocono Downs Internet	POI
Pompano Park (and Florida In-State Guest Locations)	PPK
Naples-Fort Myers Greyhound	BFM
Daytona Beach Kennel Club	DBK

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Dania Jai Alai	DJA
West Volusia Racing	DWV
Ebro Dog Track	EBG
Edgewater Jai Alai @ Magic City	EJA
Florida City Jai Alai	FCY
Magic City Jai Alai	FGH
Fort Pierce Jai Alai	FPJ
Gretna Racing LLC	GIQ
GPW- Miami Gardens	GMG
Gulfstream Park	GPK
Hamilton Jai Alai & Poker	HJP
Hialeah Park	HIA
Big Easy Racing	HKC
Big Easy Holding	HKH
Palm Beach KC Summer	INQ
Palm Beach Kennel Club	INV
Jacksonville Kennel Club	JKC
Melbourne Greyhound Park	MEL
Miami Jai Alai	MJA
Ocala Breeders Sales	OBS
Ocala Jai Alai	OJA
Orange Park Kennel	OPK
Penn-Sanford Kennel Club	ORP
Sanford-Orlando Kennel Club	ORR
Orlando Seminole Jai Alai	ORS
Oxford Downs Summerfield	OXS
Pensacola Greyhound Track	PGH
Summer Jai Alai @ Magic City	SJA
St. John's Greyhound Park	SJG
Sarasota Kennel Club	SKC
Summersport Jai Alai @ Dania	SMR
Derby Lane	SPK
Tampa Bay Downs	TAM
Tampa Greyhound Track	TKC
William Hill Miami JA	WHM
Prairie Meadows (Iowa)	PRM
Prairie Meadows Contest	PMS
Premier Gateway International (International ADW)	IOM
Phumelela Gold – Europe	EUC
Phumelela Gold - UK	UKP
Safetote	TVA
Premier Turf Club (ADW)	PRT
Premier Turf Club 2	PRS
Presque Isle Downs (Pennsylvania)	PID
Racing & Gaming Services (ADW)	RGS
Racing Gaming Services Grp. 1	RG1
Racing Gaming Services Grp. 2	RG2
Racing Gaming Services Grp. 3	RG3
Racing Gaming Services Grp. 4	RG4

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Racing Gaming Services Grp. 5	RG5
Racing Gaming Services Grp. 6	RG6
Racing Gaming Services Grp. 7	RG7
Racing Gaming Services Grp. 8	RG8
Raynham Greyhound Park (Massachusetts)	TDT
Raynham Account Wagering	TDA
Red Mile, The (Kentucky)	REM
Red Shores Racetrack & Casino (Prince Edward Island, Canada)	
Charlottetown	CTN
Summerside Raceway	SUM
Remington Park (Oklahoma)	REP
Bordertown	RPB
Newcastle Gaming Center	RPN
Riverwind Casino	RPR
Winstar Casino	RPW
Southwind Casino	SWC
Durant OTB	CHW
Choctaw Casino- Pocola	CCP
Medio Tiempo OTB	MOA
Thunder Roadhouse	TRH
RP Golden Mesa	RPG
Retama Park (Texas)	RET
Rocky Mountain Turf Club (Alberta, Canada Track, OTB's, ADW)	RMT
Whoop-Up Downs	WUP
Whoop Up Downs TAB	WUT
Ruidoso Downs (New Mexico)	RUI
Running Aces Harness Park (Minnesota)	ACE
Sam Houston Race Park (Texas)	HOU
Valley Greyhound Park	VGT
Saratoga Harness Raceway (New York)	SRA
SaratogaBets	SGR
Scarborough Downs (Maine)	SDO
Scioto Downs (Ohio)	SCD
Seabrook Greyhound (New Hampshire)	SEA
Seabrook Greyhound Phonebet	SEP
Southland Greyhound Park (Arkansas)	SGP
Sportech Venues	
Shoreline Star Greyhound Park (CT)	BJA
Connecticut OTB (CT)	CTB
Connecticut OTB Acct Wagering (ADW)	CTA
CT OTB Internet Wagering (ADW)	CTW
Ho-Chunk Casino (Wisconsin)	HOK
Mohegan Sun Casino (CT)	SUN
Mohegan Sun Poker Room (CT)	SUP
Favorites OTB (Maine)	WAT
Sanford OTB (Maine)	SFD
Oneida Bingo & Casino (Wisconsin)	ONO
Coushatta Casino Resort (Louisiana)	CSR
Tote Investment Racing Service (Barbados)	BBS

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Royal Beach Casino (St. Kitts)	RBC
Pony Bar (St. Thomas)	UVI
Hodge OTB (Virgin Islands)	HGO
Stable Duel (Handicapping Contest, Non-Wagering Site)	
Sudbury Downs (Ontario, Canada Track)	SDN
Suffolk Downs (Massachusetts)	SUF
Suffolk Regional Off-Track Betting Corporation (New York)	
Suffolk Internet & Phone Wagering	
Sunland Park (New Mexico)	SNP
SunRay Park & Casino (New Mexico)	SUR
Television Gaming Network (TVG)	TVG
TVG Massachusetts	TMA
TVG - Minnesota	TVM
TVG Illinois	TVI
TVG/Prairie Meadows Account Wagering	TVP
TVG Arizona	TVT
TVG Group 3	TV3
TVG Group 4	TV4
TVG Group 5	TV5
TVG Group 6	TV6
TVG Group 7	TV7
TVG Group 9	TV9
TVG California Retail	TC1
TVG California HV	TC2
FanDuel California Retail	TC3
FanDuel California HV	TC4
FanDuel Group 1	TF1
FanDuel Group 2	TF2
FanDuel Group 3	TF3
Betfair Games Limited (International)	BFG
Betfair Exchange Wagers (Separate Pool – New Jersey and International Exchanges)	
The Track on 2 (Alberta, Canada)	TO2
Hybrid Ultra Red Deer	HUL
Thistledown (Ohio)	TDN
Tioga Downs (New York)	TIO
Tri-State Greyhound Park (West Virginia)	TSG
Twin River Greyhound (Rhode Island)	TWR
TwinSpires (ADW)	TWS
TwinSpires Oregon (Domestic)	TWO
TwinSpires California (California Residents)	TWC
Twinspires Mountain View (Domestic)	TWN
TWS-L White Label (Domestic)	TWL
TWS-M White Label CA (California Residents)	TWM
US Offtrack (ADW)	GYC
Velocity Wagering Group Ltd. (ADW)	VVO
You Bet Portland	YBG
Velocity Wagering Grp 1	VW1
Velocity Wagering Grp 2	VW2
Velocity Wagering Grp 3	VW3

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Velocity Wagering Grp 4	VW4
Velocity Wagering Grp 5	VW5
Velocity Wagering Grp 6	VW6
Velocity Wagering Grp 7	VW7
Velocity Wagering Grp 8	VW8
Velocity Wagering Grp 9	VW9
Vernon Downs (New York)	VRN
Virginia Equine Alliance (Virginia)	VEA
WatchandWager.com, Ltd. (International ADW)	EOT
Watch and Wager (Domestic ADW)	WNW
WAW - Global	WNG
Watchandwager Player1 USD	WW1
WatchandWager CA Group	WWC
Western Regional Off-Track Betting Corporation (New York)	
Western Internet & Phone Wagering	
Batavia Downs	BTV, BAD
Batavia Downs Online	BAG
Wheeling Island (West Virginia)	WHE
Will Rogers Downs (Oklahoma)	WRD
Cherokee Casino West Siloam Springs	WSS
Cherokee Casino Sallisaw	CCE
Woodbine Entertainment Group (Ontario, Canada)	
AC Ranch Caffe Toronto	ACR
A&F Billiards	AFB
Ajax Downs	PIC
Busters Bar Ottawa	BCO
The Brunswick Hotel Complex (Don Cherry)	BHD
Bumpr's Roadhouse Milton	BPM
Broad Street Billiards	BSB
Buffy's Tavern & Dining	BTD
Club Alouette	CA1
Coach and Horses	CAH
Clancy's	CB1
Champions on Bloor	CBO
Cheffy's Last Stop	CFL
Salle de paris Place Dupuis	CJ1
Salle de paris Boucherville	CJ2
Salle de Paris de Pointe-Aux-Trembles	CJ3
Salle de Paris de Quebec	CJ4
Salle de Paris de Laval	CJ5
Salle de Paris Pointe-Claire	CJ6
Salle de Paris Square Decarie	CJ7
Salle de Paris de Sherbrooke	CJ8
Salon de Paris de Chateaugua	CJ9
Salon de Paris de Gatineau	CJ0
Salon de Paris de Brossard	CJA
West Island OTB Dorval	CJB
Clinton Raceway	CLR
Clinton Teletheatre	CLT

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Chicago Pub Kitchener	CPK
Champions at Royal Square	CRQ
DC Sports Grill Kingston	DCS
Doolys Ottawa	DOT
Elements Brantford	EBO
Flamboro Downs	FLM
Fort Erie OTB	FOO
Georgian Downs	GEO
Grand River Raceway	GRD
Grand River Raceway Teletheatre	GRO
Galaxy Lanes TB	GTB
Greenwood Racetrack	GWR
Huron Fish & Game Conservation	HFG
Honest Lawyer Hamilton	HLR
Hanover Raceway	HNV
Hippodrome de Trois-Rivieres	HTR
Karlee's OTB	KAB
Lucky 7 Bingo/VIP Lounge	L7B
Last Furlong	LAF
Lee Hotel	LEE
Western Fair Raceway	LON
London Players Bar & Grill	LPB
Mohawk Contest	MHC
McGinnins Landing LO	MLO
Moodies	MOD
Mohawk Raceway	MOH
Northern Teletheatre Network	NTN
WEG Special Event	OSE
Pic-A-Deli Oakville	PDI
Pour House Hamilton	PHH
Perth Jamesons	PJR
Pick and Shovel Cambridge	PSC
Peterborough Stick Sports	PSS
Rideau Carleton Raceway	RCR
Quinte Bowling Centre	RQU
Italia Soccer Club Ottawa	RSA
Black Bear	RTN
Rex Hotel	RXH
Shorelines Belleville	SHB
St. Thomas Jackpot City	SJC
Sneakers Sports Bar	SKS
Shoeless Joe's	SLJ
Stewart Maguires	SMS
Sgt Peppers Stouffville	SPS
Coch's Corner SSM	SSM
Thirsty Judge Bracebridge	TJB
Time Out Georgetown	TOG
Trophy Case Bradford	TRB
Ultimate Sports Bar	USB
Victoria Pub Guelph	VPG

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

Mississauga Chinese Centre	W02
Offside's	W12
RJ's on Main	W14
RJ's on Chrysler	W15
Sports Centre Cafe	W16
Stonehouse	W17
Sheraton Parkway	W18
Select Winners Lounge	W19
Turf Lounge	W20
Winner's Edge	W21
Silks	W22
WEGZ Stadium Bar	W23
Jimmyz Sports Bar	W27
Albert's Parlour	WAP
Mane Event	WEM
Adam's Rib	WER
Windsor Tavern	WIT
Champions on the Danforth	WO3
Century Palace	WO4
Deerfield	WO5
East Chinatown	WO6
Heritage	WO7
Woodbine Entertainment Group Int'l	WO8
Woodbine	WOO
Assiniboia HPI	AHP
Barrie IVR	BAI
British Columbia Telephone Acct. Wagering	BCT
Quinte IVR	BQI
Century Bets HPI	CBI
Clinton IVR	CLI
Charlottetown IVR	CTI
Dresden IVR	DRI
Elmira IVR	ELI
Ex Park IVR	EPI
Flamboro IVR	FLN
Fort Erie IVR	FOI
Hiawatha IVR	HHI
Hanover IVR	HNI
Kawartha IVR	KAI
Western Fair IVR	LOI
Marquis IVR	MAI
Newfoundland IVR	NFI
Northlands IVR	NOI
Nova Scotia IVR	NSI
Quebec HPI	QBC
Rideau IVR	RII
Sudbury IVR	SD1
Summerside IVR	SUI
IVR WEG/FLAM	WEF
IVR WEG/GRAND	WEG

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 28

IVR WEG/OTN	WEO
Windsor IVR	WII
Windsor IVR II	WIP
Woodbine IVR	WOI
Woodstock IVR	WRI
<hr/>	
Wyoming Downs LLC (Wyoming)	
WY Downs Gillette OTB	WDA
WY Downs Evanston OTB	WDE
Outlaw Saloon	OLS
Sushi Boat & Bar	SBB
Rails Brews & Cues	RCB
Shilo Inn OTB	SIO
WY Downs Rock Springs OTB	WDR
Cheyenne Plaza	CYP
<hr/>	
Xpressbet (ADW)	
MEC Internet	MEI
MEC TAT	TAT
MEC Telephone	MET
Xpressbet Arizona	XAZ
Xpressbet Illinois	XIL
Xpressbet Maryland	XMD
Xpressbet Southern Alberta	XSA
<hr/>	
Yonkers Raceway (New York)	YOR
EmpireCityBets Yonkers	ECB
<hr/>	
Zia Park (New Mexico)	ZIA
<hr/>	



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Plainridge Park Casino Request for Simulcast
Import Locations for 2023

Dear Commissioners:

As part of their Application for a License to Hold or Conduct a Racing Meeting in 2023, Steve O'Toole, Director of Racing, Plainridge Park Casino, included their list of requested simulcast import locations as Exhibit 27.

Chapter 128 of the Acts of 2022 of the Commonwealth of Massachusetts Section A1 amends Chapter 128C of the General Laws by adding Section 9, which eliminates simulcast wagering on greyhound dog racing. Section 18 states this will take effect on August 1, 2023.

Recommendation: That the Commission approves the Plainridge Park request for approval of the simulcast import locations for horse racing listed in their Application for a License to Hold or Conduct a Racing Meeting in 2023, for the calendar year 2023.

That the Commission approves the Plainridge Park request for approval of the simulcast import locations for greyhound dog racing listed in their Application for a License to Hold or Conduct a Racing Meeting in 2023 until August 1, 2023, consistent with Chapter 128 of the Acts of 2022.



Massachusetts Gaming Commission

EXHIBIT 27

Include as Exhibit 27 a master list of requested simulcast imports. A new form (“Licensee Request for Simulcast Import”) MUST be completed for EACH signal and submitted to the Commission no later than November 29 of each calendar year. Approval letters from the host racetrack’s regulatory authority and both representative horsemen’s groups must be on file with MGC by the close of business on the day prior to the first day of import.

IMPORT SIMULCAST SIGNALS

Notice of “Premium Free” Election

Plainville Gaming and Redevelopment, LLC identifies and elects the period from Sunday June 18, 2023 to Saturday September 9, 2023 as the period for “which no premium need be paid” for simulcast signals received in accordance with MGL 128C, section 2 (4). The remaining period subject to be paid as outlined in the premium provisions in 128C, section 2 (5).

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 27

- Ajax Downs, Canada
- Alameda County Fair, CA (Pleasanton)
- Aqueduct, NY
- Arapahoe Park, CO
- Arc de Triomphe, France
- Argentina Racing (Sky Racing World), Argentina
- Arizona Downs, AZ
- Assiniboia Downs, Canada
- Australia Racing (Sky Racing World), Australia
- Australia Greyhound Racing (Sky Racing World), Australia
- Bangor Raceway, ME
- Batavia Downs, NY
- Belmont Park, NY
- Belterra Park, OH
- Big Fresno Fair, CA (Fresno)
- Breeders' Cup, CA
- Breeders' Cup Future Wager, CA
- Buffalo Raceway, NY
- Cal Expo, CA
- Caliente Hipódromo Greyhound, Mexico
- California State Fair, CA (Sacramento)
- Canterbury Park, MN
- Century Downs, Canada (Harness Meet)
- Century Downs, Canada (Thoroughbred Meet)
- Century Mile, Canada (Harness Meet)
- Century Mile, Canada (Thoroughbred Meet)
- Charles Town, WV
- Churchill Downs, KY
- Clinton Raceway, Canada
- Colonial Downs, VA
- Dayton Raceway, OH
- Del Mar Thoroughbred Club, CA
- Delaware County Fair, OH
- Delaware Park, DE
- Delta Downs, LA (Quarter Horse Meet)
- Delta Downs, LA (Thoroughbred Meet)
- Dover Downs, DE
- Dubai World Cup, United Arab Emirates
- DuQuoin State Fair, IL
- Ellis Park, KY
- Emerald Downs, WA
- Evangeline Downs, LA (Quarter Horse Meet)
- Evangeline Downs, LA (Thoroughbred Meet)
- Fair Grounds Race Course, LA (Quarter Horse Meet)
- Fair Grounds Race Course, LA(Thoroughbred Meet)
- Fair Meadows at Tulsa, OK
- Fairmount Park, IL
- Fairplex Park, CA
- Finger Lakes, NY
- Flamboro Downs, Canada
- Fonner Park, NE
- Fort Erie Racetrack, Canada
- Fraser Downs, Canada
- Freehold Raceway, NJ
- French Racing (PMU), France
- Georgian Downs, Canada
- Golden Gate Fields, CA
- Grand River Raceway, Canada
- Grants Pass Downs, OR
- Gulfstream Park, FL
- Harrah's Philadelphia, PA
- Harrington Raceway, DE
- Hanover Raceway, Canada
- Hastings Racecourse, Canada
- Hawthorne Race Course, IL (Harness Meet)
- Hawthorne Race Course, IL (Thoroughbred Meet)
- Hiawatha Horse Park, Canada
- Hippodrome Trois-Rivieres, Canada
- Hong Kong Jockey Club, Hong Kong
- Hoosier Park, IN
- Horsemen's Park, NE
- Humboldt County Fair, CA (Ferndale)
- Illinois State Fair, IL
- Indiana Grand Racing Casino, IN
- Iowa Greyhound Association, IA
- Irish Greyhound Racing, Ireland (see attached list of tracks)
- Irish Thoroughbred Racing, Ireland (see attached list of tracks)
- Japan Racing (Sky Racing World), Japan
- Japan Racing (Woodbine), Japan
- Kawartha Downs, Canada
- Keeneland, KY
- Kentucky Derby Future Wager, KY
- Kentucky Derby Sire Future Wager, KY
- Kentucky Downs, KY
- Kentucky Oaks Future Wager, KY

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 27

Latin American Racing Channel Thru Gulfstream	Running Aces Harness Park, MN
Latin American Racing Channel Thru Laurel	Saudi Cup, Saudi Arabia
Latin American Racing Channel Thru Pimlico	Sam Houston Race Park, TX (Quarter Horse)
Laurel Park, MD	Sam Houston Race Park, TX (Thoroughbred)
Little Brown Jug Future Wager, OH	San Joaquin County Fair, CA (Stockton)
Lone Star Park, TX (Quarter Horse Meet)	Santa Anita Park, CA
Lone Star Park, TX (Thoroughbred Meet)	Saratoga Raceway, NY (Harness)
Los Alamitos, CA (Quarter Horse Meet)	Saratoga, NY (Thoroughbred)
Los Alamitos, CA (Thoroughbred Meet)	Scarborough Downs, ME
Louisiana Downs, LA (Quarter Horse Meet)	Scioto Downs, OH
Louisiana Downs, LA (Thoroughbred Meet)	Shenandoah Downs (Harness), VA
Malaysia Racing (Sky Racing World), Malaysia	Singapore Racing (Sky Racing World), Singapore
Mahoning Valley Race Course, OH	Sonoma County Fair, CA (Santa Rosa)
Melbourne Racing Club, Australia	South Africa Racing, (Sky Racing World) South Africa
Meadowlands, NJ	South Korea Racing (Sky Racing World), South Korea
Miami Valley Gaming, OH	Southland Greyhound Park, AR
Mohawk Racetrack, Canada	Suffolk Downs, MA
Monmouth Park, NJ	Sunland Park, NM
Monticello Raceway, NY	SunRay Park, NM
Moosomin D&E @ Marquis Downs, Canada	Tampa Bay Downs, FL
Mountaineer Park, WV	The Downs at Albuquerque, NM
New Zealand Racing (Sky Racing World), New Zealand	The Meadows, PA
Northfield Park, OH	The Red Mile, KY
Northville Downs, MI	Thistledown, OH
Oak Grove Racing, KY	Timonium Fair, MD
Oaklawn Park, AR	Tioga Downs, NY
Ocean Downs, MD	Tri-State Greyhound Park, WV
Parx Racing, PA	Turf Paradise, AZ
Penn National Race Course, PA	Turfway Park, KY
Pimlico, MD	UK Thoroughbred Racing, United Kingdom (see attached list of tracks)
Pocono Downs, PA	UK Greyhound Racing, United Kingdom (see attached list of tracks)
Prairie Meadows, IA	Valley Race Park, TX
Presque Isle Downs, PA	Vernon Downs, NY
Red Shores Charlottetown, Canada	Virginia Gold Cup Races, VA
Red Shores Summerside, Canada	Western Fair Raceway, Canada
Remington Park, OK (Quarter Horse Meet)	Wheeling Island Greyhound, WV
Remington Park, OK (Thoroughbred Meet)	Will Rogers Downs, OK (Quarter Horse Meet)
Retama Park, TX (Quarter Horse Meet)	Will Rogers Downs, OK (Thoroughbred Meet)
Rideau Carleton Raceway, Canada	Woodbine, Canada (Harness Meet)
Rillito Park, AZ	Woodbine, Canada (Thoroughbred Meet)
Rosecroft Raceway, MD	Yonkers Raceway, NY
Ruidoso Downs, NM	Zia Park, NM

2023 Plainville Gaming and Redevelopment, LLC – Exhibit 27

UK THOROUGHBRED TRACKS

Ascot
 Bath
 Brighton
 Chelmsford City
 Chepstow
 Doncaster
 Exeter
 Fakenham
 Ffos Las
 Fontwell
 Yarmouth
 Hereford
 Hexham
 Kelso
 Leicester
 Lingfield
 Newcastle
 Newton Abbot
 Perth
 Plumpton
 Ripon
 Windsor
 Sedgefield
 Southwell
 Stratford
 Taunton
 Towcester
 Uttoxeter
 Wolverhampton
 Worcester
 Aintree
 Ayr
 Bangor-on-Dee
 Beverley
 Carlisle
 Cartmel
 Catterick
 Chester
 Cheltenham
 Epsom
 Goodwood
 Hamilton Park
 Haydock Park
 Huntingdon

Kempton Park
 Ludlow
 Market Rasen
 Musselburgh
 Newbury
 Newmarket
 Nottingham
 Pontefract
 Redcar
 Salisbury
 Sandown Park
 Thirsk
 Warwick
 Wetherby
 Wincanton
 York

IRELAND THOROUGHBRED TRACKS

Ballinrobe
 Bellewstown
 Clonmel
 Cork
 Curragh
 Downpatrick
 Down Royal
 Dundalk
 Fairyhouse
 Galway
 Gowran Park
 Kilbeggan
 Killarney
 Laytown
 Leopardstown
 Limerick City
 Listowel
 Naas
 Navan
 Punchestown
 Roscommon
 Sligo
 Thurles
 Tipperary
 Tramore
 Wexford

UK GREYHOUND TRACKS

Central Park
Crayford
Doncaster
Harlow
Henlow
Monmore Green
Romford

IRELAND GREYHOUND TRACKS

Cork
Kilkenny
Waterford (aka Kilcohan Park)
Limerick
Mullingar
Tralee
Youghal

Acts of 2022, Chapter 128

AN ACT TO EXTEND LIVE HORSE RACING AND SIMULCASTING IN THE COMMONWEALTH

Whereas, The deferred operation of this act would tend to defeat its purpose, which is to further regulate simulcasting, therefore it is hereby declared to be an emergency law, necessary for the immediate preservation of the public convenience.

Be it enacted by the Senate and House of Representatives in General Court assembled, and by the authority of the same, as follows:

SECTION A1. Chapter 128C of the General Laws is hereby amended by adding the following section:-

Section 9. Notwithstanding sections 1 to 8, inclusive, or any other general or special law to the contrary, no racing meeting licensee, including a licensee holding racing meetings in connection with a state or county fair, as defined in section 1 of chapter 128A, shall simulcast or accept a simulcast wager on greyhound dog racing.

SECTION 1. The first paragraph of section 12A of chapter 494 of the acts of 1978 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 1 of chapter 27 of the acts of 2021, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 2. The last paragraph of said section 12A of said chapter 494 is hereby amended by striking out the words "July 31, 2022", inserted by section 2 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 3. The introductory paragraph of section 13 of said chapter 494 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 3 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 4. Section 15 of said chapter 494 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 4 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 5. The first paragraph of section 9 of chapter 277 of the acts of 1986 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 5 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 6. The first sentence of the first paragraph of section 3 of chapter 114 of the acts of 1991 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 6 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 7. The last paragraph of said section 3 of said chapter 114 is hereby amended by striking out the words "July 31, 2022", inserted by section 7 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 8. The first paragraph of section 4 of said chapter 114 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 8 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 9. The last paragraph of said section 4 of said chapter 114 is hereby amended by striking out the words "July 31, 2022", inserted by section 9 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 10. The first paragraph of section 5 of said chapter 114 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 10 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 11. Section 45 of chapter 139 of the acts of 2001 is hereby amended by striking out the words "July 31, 2022", inserted by section 11 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 12. Section 20 of chapter 449 of the acts of 2006 is hereby amended by striking out the words "July 31, 2022", inserted by section 12 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 13. Section 92 of chapter 194 of the acts of 2011 is hereby amended by striking out the words "July 31, 2022", inserted by section 13 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 14. Section 112 of said chapter 194 is hereby amended by striking out the words "July 31, 2022", inserted by section 14 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 15. Section 74 of chapter 10 of the acts of 2015 is hereby amended by striking out the words "July 31, 2022", inserted by section 15 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 16. Section 17 of chapter 27 of the acts of 2021 is hereby repealed.

SECTION 17. Notwithstanding section 2 of chapter 128A of the General Laws and sections 1, 2, 2A and 4 of chapter 128C of the General Laws or any other general or special law to the contrary, the running race horse meeting licensee located in Suffolk county licensed to conduct live racing pursuant to said chapter 128A and simulcast wagering pursuant to said chapter 128C in calendar year 2022 shall remain licensed as a running horse racing meeting licensee until July 31, 2023 and shall remain authorized to conduct simulcast wagering pursuant to said chapter 128C until July 31, 2023; provided, however, that the days between the effective date of this act and July 31, 2023 shall be dark days pursuant to said chapter 128C and the licensee shall be precluded from conducting live racing during that period unless it applies for and is granted a supplemental live racing license pursuant to said chapter 128A; provided further, that all simulcasts shall comply with the Interstate Horse Racing Act of 1978, 15 U.S.C. 3001 et seq. or other applicable federal law; provided further, that all simulcasts from states which have racing associations that do not require approval in compliance with the Interstate Horse Racing Act of 1978, 15 U.S.C. 3004(a)(1)(A) shall require the approval of the New England Horsemen's Benevolent & Protective Association prior to being simulcast to a racing meeting licensee within the commonwealth; and provided further, that if the association agrees to approve the simulcast for 1 racing meeting licensee, it shall approve the simulcast for all otherwise eligible racing meeting licensees.

SECTION 18. Section A1 shall take effect on August 1, 2023.

Approved, August 1, 2022.



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Plainridge Park Casino Request for Account
Wagering System

Dear Commissioners:

As part of their Application for a License to Hold or Conduct a Racing Meeting in 2023, Steve O'Toole, Director of Racing, Plainridge Park Casino, included their request for authorization for account wagering through PENN ADW, LLC, d/b/a Hollywood Races, using the eBet Technologies platform, as Exhibit 29. The Massachusetts Gaming Commission first authorized this system at their October 26, 2016 meeting.

Recommendation: That the Commission approves the Plainridge Park request for approval of their account wagering through PENN ADW, LLC, d/b/a Hollywood Races, using the eBet Technologies platform listed as Exhibit 29 in their Application for a License to Hold or Conduct a Racing Meeting in 2023.

That PENN ADW, LLC, d/b/a Hollywood Races, not accept wagering in Massachusetts on greyhound dog racing after July 31, 2023, consistent with Chapter 128 of the Acts of 2022.



Massachusetts Gaming Commission

EXHIBIT 29

Include as Exhibit 29 a request for authorization for a system of account wagering in accordance with 205 CMR 6.20: General Account Wagering. The request shall include information related to any planned, non-monetary, incentive programs and account security plans. If a service provider is used, include copies of any and all agreements between the service provider and the applicant regarding the services to be provided by the service provider to the applicant in respect to the applicant's account wagering operations

In accordance with 205 CMR 6.20, Plainville Gaming and Redevelopment, LLC ("PGR"), d/b/a Plainridge Park Casino ("Plainridge"), requests through this harness racing license application for 2023, authorization from the Massachusetts Gaming Commission ("MGC") to offer account wagering in 2023. PGR has contracted with PENN ADW, LLC, ("PENN") a licensee of the MGC, to operate account wagering under the d/b/a *Hollywood Races* (agreement previously attached). Account wagering offered by Plainridge dates to its "WinLine" System originally approved by the Massachusetts State Racing Commission on April 3, 2002.

PENN has contracted with eBet Technologies ("eBet"), a licensee of the MGC, to provide all technical and wagering platform services for *Hollywood Races* to on and off-track customers of Plainridge accessible via the website, www.hollywoodraces.com and through a mobile app (available on both iOS and Android systems).

In 2021, Massachusetts account holders registered with *Hollywood Races* wagered \$4.95 million, representing approximately 20% of the total live and simulcast handle for PRG during the year.

Since 2016, pari-mutuel wagering on-track at Plainridge and through *Hollywood Races* has been combined with *myChoice* the Plainridge Park Casino customer rewards program with points earned for redemption of food and beverage offerings at the racetrack/casino and for racing related handicapping information (programs, etc.).

PGR's parent company, Penn Entertainment, Inc. has over 30 years experience in account wagering through its subsidiary Mountainview Thoroughbred Racing Association previously d/b/a EbetUSA.com and Telebet and as of September 2018, Hollywood Races also holds Multi-Jurisdictional Account Wagering licenses in the states of Oregon and New York and accepts wagers from residents of 24 states.



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Suffolk Downs Request for Premium-Free Period
for 2023

Dear Commissioners:

Suffolk Downs COO Michael Buckley has submitted a request for approval of a Premium-Free Period from October 9, 2023 through and including December 31, 2023. This is in accordance with Massachusetts General Laws Chapter 128C, §2 (5).

Recommendation: That the Commission approves the Suffolk Downs request for approval of their premium free period from October 9, 2023 through December 31, 2023.



Massachusetts Gaming Commission



November 30, 2022

Via email

Dr. Alex Lightbown
Director of Racing and Chief Veterinarian
Massachusetts Gaming Commission
alexandra.lightbown@massgaming.com

Re: Suffolk Downs' Request for 2023 Premium-Free Period

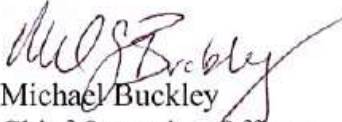
Dear Dr. Lightbown:

I write in accordance with Massachusetts General Laws ch. 128C, §2(5) in connection with the annual designation by Sterling Suffolk Racecourse, LLC ("Suffolk Downs") of its "premium-free" period with respect to interstate harness signals. Under the racing statutes, Suffolk Downs is authorized to designate a 12-week period each year as to which it is not required to pay premiums on wagers on harness races simulcast at its facility. As you know, when Suffolk Downs was hosting live racing, this designation was part of our annual application for live racing dates. Under existing statutes, Suffolk Downs is authorized to conduct simulcast wagering without any requirement that it also conduct live racing and thus we have not been required to file an annual application. We have nevertheless continued to seek Commission approval of our designation each year.

For 2023, Suffolk Downs asks that the Commission approve its designation of a premium-free period from October, 9, 2023 through December 31, 2023.

Thank you for your time and consideration.

Sincerely,


Michael Buckley
Chief Operating Officer



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Suffolk Downs Request for Simulcast Import
Locations for 2023

Dear Commissioners:

Suffolk Downs' Chief Operating Official Michael Buckley has submitted a request for approval of simulcast import locations dated November 30, 2023. These locations usually are approved as part of a racing licensee's application for live racing. Under the current statutes, Suffolk is authorized to simulcast without conducting live racing. Suffolk Downs did not apply for live racing dates in 2023, necessitating a separate approval by the Commission.

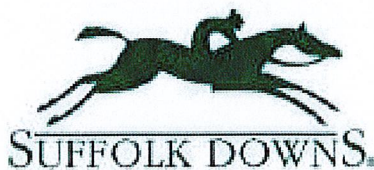
Chapter 128 of the Acts of 2022 of the Commonwealth of Massachusetts Section A1 amends Chapter 128C of the General Laws by adding Section 9, which eliminates simulcast wagering on greyhound dog racing. Section 18 states this will take effect on August 1, 2023.

Recommendation: That the Commission approves the Suffolk Downs request for approval of their simulcast import locations for horse racing listed in their November 30, 2022 letter for calendar year 2023.

That the Commission approves the Suffolk Downs request for approval of the simulcast import locations for greyhound dog racing listed in their November 30, 2022 letter until August 1, 2023, consistent with Chapter 128 of the Acts of 2022.



Massachusetts Gaming Commission



November 30, 2022

Via email

Dr. Alex Lightbown
Director of Racing and Chief Veterinarian
Massachusetts Gaming Commission
alexandra.lightbown@massgaming.com

Re: Suffolk Downs's Request for Approval of 2023 Simulcast Import Signals

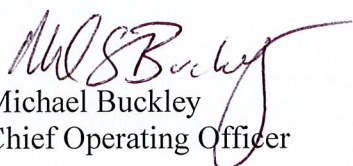
Dear Dr. Lightbown:

I write to request that the Commission approve simulcast import signals for Sterling Suffolk Racecourse, LLC ("Suffolk Downs") for 2023. As you know, when Suffolk Downs was hosting live racing, this request was part of our annual application for live racing dates. Under existing statutes, Suffolk Downs is authorized to conduct simulcast wagering without any requirement that it also conduct live racing and thus we have not been required to file annual application. We have nevertheless continued to seek Commission approval of our import signals each year.

Accordingly, Suffolk Downs asks that the Commission approve the simulcast import signals set forth in the enclosed list for purposes of simulcast wagering in 2023.

Thank you for your time and consideration.

Sincerely,


Michael Buckley
Chief Operating Officer

enclosure

<u>2023 Import</u>	<u>Type</u>	<u>Subordinate</u>
AJAX DOWNS	Thoroughbred/Mixed Meet	
ALBUQUERQUE	Thoroughbred/Mixed Meet	
AQUEDUCT	Thoroughbred/Mixed Meet	
ARAPAHOE	Thoroughbred/Mixed Meet	
ARLINGTON	Thoroughbred/Mixed Meet	
ASSINIBOIA	Thoroughbred/Mixed Meet	
BELMONT	Thoroughbred/Mixed Meet	
BELTERRA	Thoroughbred/Mixed Meet	
BIRMINGHAM RACE COURSE	Greyhound	
BREEDERS CUP	Thoroughbred/Mixed Meet	
BREEDERS CUP FUTURE WAGER	Thoroughbred/Mixed Meet	
BREEDERS CUP SIRE FUTURE WAGER	Thoroughbred/Mixed Meet	
CALIENTE	Greyhound	
CALIFORNIA FAIRS	Thoroughbred/Mixed Meet	
CANTERBURY	Thoroughbred/Mixed Meet	
CENTURY DOWNS	Thoroughbred/Mixed Meet	
CHARLES TOWN	Thoroughbred/Mixed Meet	
CHURCHILL	Thoroughbred/Mixed Meet	
COLONIAL DOWNS	Thoroughbred/Mixed Meet	
DEL MAR	Thoroughbred/Mixed Meet	
DELAWARE	Thoroughbred/Mixed Meet	
DELTA DOWNS	Thoroughbred/Mixed Meet	
DUBAI (Carnival & World Cup)	Thoroughbred/Mixed Meet	
ELLIS	Thoroughbred/Mixed Meet	
EMERALD	Thoroughbred/Mixed Meet	
EVANGELINE	Thoroughbred/Mixed Meet	
FAIRGROUNDS	Thoroughbred/Mixed Meet	
FAIRMOUNT	Thoroughbred/Mixed Meet	
FAIRPLEX	Thoroughbred/Mixed Meet	
FINGER LAKES	Thoroughbred/Mixed Meet	
FLAMBORO	Harness	
FONNER	Thoroughbred/Mixed Meet	
FORT ERIE	Thoroughbred/Mixed Meet	
FREEHOLD	Harness	
GOLDEN GATE	Thoroughbred/Mixed Meet	
GRAND RIVER RACEWAY	Thoroughbred/Mixed Meet	Latin American Racing as defined in Monarch Management contract
GULFSTREAM	Thoroughbred/Mixed Meet	Latin American Racing as defined in Monarch Management contract
GULFSTREAM WEST	Thoroughbred/Mixed Meet	
HARRAH'S @ PHILLY	Harness	
HARRINGTON	Harness	
HASTINGS	Thoroughbred/Mixed Meet	
HAWTHORNE	Harness	
HAWTHORNE	Thoroughbred/Mixed Meet	
HOOSIER	Harness	
HORSESHOE INDIANAPOLIS	Thoroughbred/Mixed Meet	
KEENELAND	Thoroughbred/Mixed Meet	
KENTUCKY DERBY FUTURE WAGER	Thoroughbred/Mixed Meet	
KENTUCKY OAKS FUTURE WAGER	Thoroughbred/Mixed Meet	
KENTUCKY SIRE FUTURE WAGER	Thoroughbred/Mixed Meet	
KENTUCKY DOWNS	Thoroughbred/Mixed Meet	Latin American Racing as defined in Monarch Management contract
LAUREL	Thoroughbred/Mixed Meet	
LONE STAR	Thoroughbred/Mixed Meet	
LOS ALAMITOS	Thoroughbred/Mixed Meet	
LOUISIANA	Thoroughbred/Mixed Meet	
MAHONING VALLEY	Thoroughbred/Mixed Meet	
MEADOWLANDS	Thoroughbred/Mixed Meet	
MEADOWLANDS	Harness	
MEADOWS	Harness	
MOHAWK	Harness	
MONMOUTH	Thoroughbred/Mixed Meet	
MONTICELLO	Harness	
MOUNTAINEER	Thoroughbred/Mixed Meet	
NORTHFIELD	Harness	
NORTHLANDS	Thoroughbred/Mixed Meet	
OAKLAWN	Thoroughbred/Mixed Meet	
OCEAN DOWNS	Harness	
PARX (Philadelphia Park)	Thoroughbred/Mixed Meet	
PENN NATIONAL	Thoroughbred/Mixed Meet	Latin American Racing as defined in Monarch Management contract
PIMLICO	Thoroughbred/Mixed Meet	
PLAINRIDGE	Harness	

POCONO	Harness	
POMPANO	Harness	
PRAIRIE MEADOWS	Thoroughbred/Mixed Meet	
PRESQUE ISLE	Thoroughbred/Mixed Meet	
RED MILE	Harness	
REMINGTON	Thoroughbred/Mixed Meet	
RETAMA	Thoroughbred/Mixed Meet	
ROSECROFT	Harness	
RUIDOSO	Thoroughbred/Mixed Meet	
SAM HOUSTON	Thoroughbred/Mixed Meet	
SANTA ANITA	Thoroughbred/Mixed Meet	
SARATOGA	Thoroughbred/Mixed Meet	
SARATOGA	Harness	
SAUDI CUP	Thoroughbred/Mixed Meet	
SCIOTO DOWNS	Harness	
SOUTHLAND GREYHOUND PARK	Greyhound	
SUNLAND	Thoroughbred/Mixed Meet	
SUNRAY	Thoroughbred/Mixed Meet	
TAMPA BAY	Thoroughbred/Mixed Meet	
THISTLE DOWN	Thoroughbred/Mixed Meet	
TIMONIUM	Thoroughbred/Mixed Meet	
TIOGA DOWNS	Harness	
TRI-STATE GREYHOUND PARK	Greyhound	
TURF PARADISE	Thoroughbred/Mixed Meet	
TURFWAY	Thoroughbred/Mixed Meet	
VERNON	Harness	
WHEELING ISLAND	Greyhound	
WILL ROGERS DOWNS	Thoroughbred/Mixed Meet	
WOODBINE	Thoroughbred/Mixed Meet	
WOODBINE	Harness	
WOODLANDS	Thoroughbred/Mixed Meet	
YONKERS	Harness	
ZIA PARK	Thoroughbred/Mixed Meet	

Acts of 2022, Chapter 128

AN ACT TO EXTEND LIVE HORSE RACING AND SIMULCASTING IN THE COMMONWEALTH

Whereas, The deferred operation of this act would tend to defeat its purpose, which is to further regulate simulcasting, therefore it is hereby declared to be an emergency law, necessary for the immediate preservation of the public convenience.

Be it enacted by the Senate and House of Representatives in General Court assembled, and by the authority of the same, as follows:

SECTION A1. Chapter 128C of the General Laws is hereby amended by adding the following section:-

Section 9. Notwithstanding sections 1 to 8, inclusive, or any other general or special law to the contrary, no racing meeting licensee, including a licensee holding racing meetings in connection with a state or county fair, as defined in section 1 of chapter 128A, shall simulcast or accept a simulcast wager on greyhound dog racing.

SECTION 1. The first paragraph of section 12A of chapter 494 of the acts of 1978 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 1 of chapter 27 of the acts of 2021, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 2. The last paragraph of said section 12A of said chapter 494 is hereby amended by striking out the words "July 31, 2022", inserted by section 2 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 3. The introductory paragraph of section 13 of said chapter 494 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 3 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 4. Section 15 of said chapter 494 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 4 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 5. The first paragraph of section 9 of chapter 277 of the acts of 1986 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 5 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 6. The first sentence of the first paragraph of section 3 of chapter 114 of the acts of 1991 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 6 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 7. The last paragraph of said section 3 of said chapter 114 is hereby amended by striking out the words "July 31, 2022", inserted by section 7 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 8. The first paragraph of section 4 of said chapter 114 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 8 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 9. The last paragraph of said section 4 of said chapter 114 is hereby amended by striking out the words "July 31, 2022", inserted by section 9 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 10. The first paragraph of section 5 of said chapter 114 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 10 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 11. Section 45 of chapter 139 of the acts of 2001 is hereby amended by striking out the words "July 31, 2022", inserted by section 11 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 12. Section 20 of chapter 449 of the acts of 2006 is hereby amended by striking out the words "July 31, 2022", inserted by section 12 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 13. Section 92 of chapter 194 of the acts of 2011 is hereby amended by striking out the words "July 31, 2022", inserted by section 13 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 14. Section 112 of said chapter 194 is hereby amended by striking out the words "July 31, 2022", inserted by section 14 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 15. Section 74 of chapter 10 of the acts of 2015 is hereby amended by striking out the words "July 31, 2022", inserted by section 15 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 16. Section 17 of chapter 27 of the acts of 2021 is hereby repealed.

SECTION 17. Notwithstanding section 2 of chapter 128A of the General Laws and sections 1, 2, 2A and 4 of chapter 128C of the General Laws or any other general or special law to the contrary, the running race horse meeting licensee located in Suffolk county licensed to conduct live racing pursuant to said chapter 128A and simulcast wagering pursuant to said chapter 128C in calendar year 2022 shall remain licensed as a running horse racing meeting licensee until July 31, 2023 and shall remain authorized to conduct simulcast wagering pursuant to said chapter 128C until July 31, 2023; provided, however, that the days between the effective date of this act and July 31, 2023 shall be dark days pursuant to said chapter 128C and the licensee shall be precluded from conducting live racing during that period unless it applies for and is granted a supplemental live racing license pursuant to said chapter 128A; provided further, that all simulcasts shall comply with the Interstate Horse Racing Act of 1978, 15 U.S.C. 3001 et seq. or other applicable federal law; provided further, that all simulcasts from states which have racing associations that do not require approval in compliance with the Interstate Horse Racing Act of 1978, 15 U.S.C. 3004(a)(1)(A) shall require the approval of the New England Horsemen's Benevolent & Protective Association prior to being simulcast to a racing meeting licensee within the commonwealth; and provided further, that if the association agrees to approve the simulcast for 1 racing meeting licensee, it shall approve the simulcast for all otherwise eligible racing meeting licensees.

SECTION 18. Section A1 shall take effect on August 1, 2023.

Approved, August 1, 2022.



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
 Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Suffolk Downs Request for Approval of Advance Deposit Wagering (Account Wagering) Vendors

Dear Commissioners:

Suffolk Downs’ Chief Operating Official Michael Buckley has submitted a request for approval of the following Advance Deposit Wagering providers: XpressBet LLC and its affiliate 1/ST Bet, TVG, Twin Spires, FanDuel Racing, NYRA Bets, BetMGM, and Caesars Racebook for 2023. All of these have been approved previously by the Commission, except for Caesars Racebook.

Caesars Racebook has a marketing affiliation with NYRA Bets for parimutual racing. NYRA Bets has been authorized in Massachusetts since 2016 as an Advance Deposit Wagering provider. A document has been provided regarding the association between the two. It is similar to the NYRA Bets affiliation with BetMGM. Through their partnership with Caesars Racebook, NYRA Bets “administers all aspects of the racing function provided to Caesars Racebook horse racing customers” and supplies the NYRA Bets technology to them. NYRA Bets Fraud Mitigation and Player Integrity teams monitor and supply Caesars Racebook with any suspicious wagering reports. Caesars Racebook is currently operating in Florida, Indiana, Kentucky, Maryland, Montana, North Dakota, Ohio, and Oregon. Past practice has been to reciprocate when Account Wagering providers are already operating in other jurisdictions. We do not have any information that there have been issues with account wagering by this provider. Please note that the below recommended approval is for Account Wagering purposes only, and similar to BetMGM, has no bearing on any potential license application for other activity.



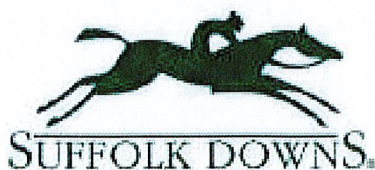
Massachusetts Gaming Commission

Recommendation: That the Commission approves the Suffolk Downs request for approval of XpressBet LLC and 1/ST Bet, TVG, Twin Spires, FanDuel Racing, NYRAbets, BetMGM and Caesars Racebook as their Advance Deposit Wagering vendors, for parimutuel wagering purposes only.

That the above vendors not accept wagering in Massachusetts on greyhound dog racing after July 31, 2023, consistent with Chapter 128 of the Acts of 2022.



Massachusetts Gaming Commission



November 30, 2022

Via email

Dr. Alex Lightbown
Director of Racing and Chief Veterinarian
Massachusetts Gaming Commission
alexandra.lightbown@massgaming.com

Re: Suffolk Downs's Request for Approval of 2023 ADW Vendors

Dear Dr. Lightbown:

I write in accordance with 205 CMR 6.20 to request that the Commission approve account wagering, or advance deposit wagering (ADW), vendors for Sterling Suffolk Racecourse, LLC ("Suffolk Downs") for 2023.

Suffolk Downs seeks approval of XpressBet, its affiliate 1/ST Bet, TVG, Twin Spires, FanDuel Racing, NYRA Bets, BetMGM, and Caesars Racebook as its 2023 account wagering providers. The Commission has previously approved each of these vendors other than Caesars Racebook.

With respect to BetMGM, and consistent with the terms on which the Commission approved BetMGM in February 2022, SSR confirms that it seeks approval of BetMGM as an ADW provider only and not in connection with any other wagering services that BetMGM might provide.

With respect to Caesars Racebook, it has a marketing affiliation with NYRA Bets for parimutuel racing. The Caesars Racebook app launched in June 2022 and is currently available in eight states: Florida, Indiana, Kentucky, Maryland, Montana, North Dakota, Ohio, and Oregon. NYRA Bets, which has been an authorized ADW provider in Massachusetts since 2016, has informed us that parimutuel wagering on horse racing through the Caesars Racebook-branded app operates on the existing NYRA Bets infrastructure. NYRA Bets hosts the patron accounts and wallets and provides customer service and wagers utilize NYRA Bets' tote, streaming, data, settlement and related operations. As with BETMGM, we seek approval of Caesars Racebook as an ADW provider for parimutuel wagering only.

We are happy to provide any additional information or answer any questions you or the Commission may have in order to be able to act on this request. Thank you for your time and consideration.

Sincerely,

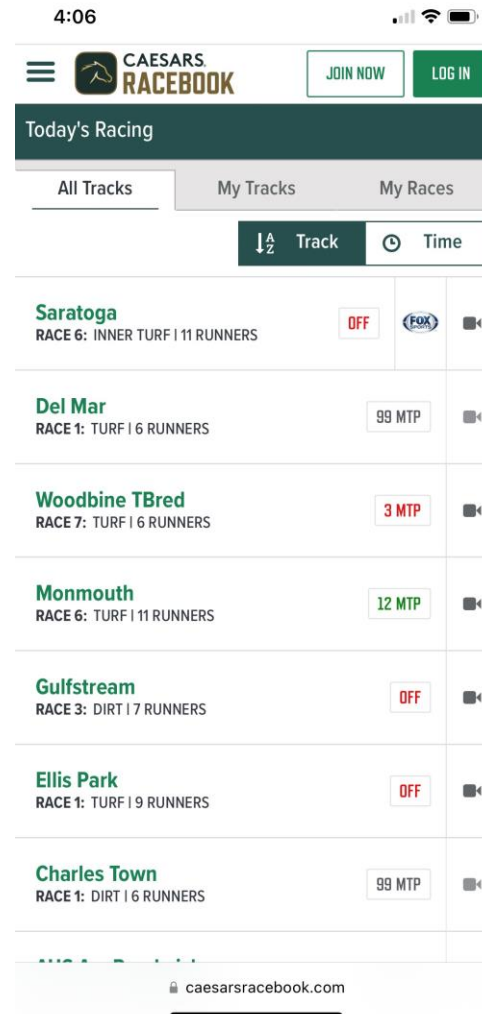
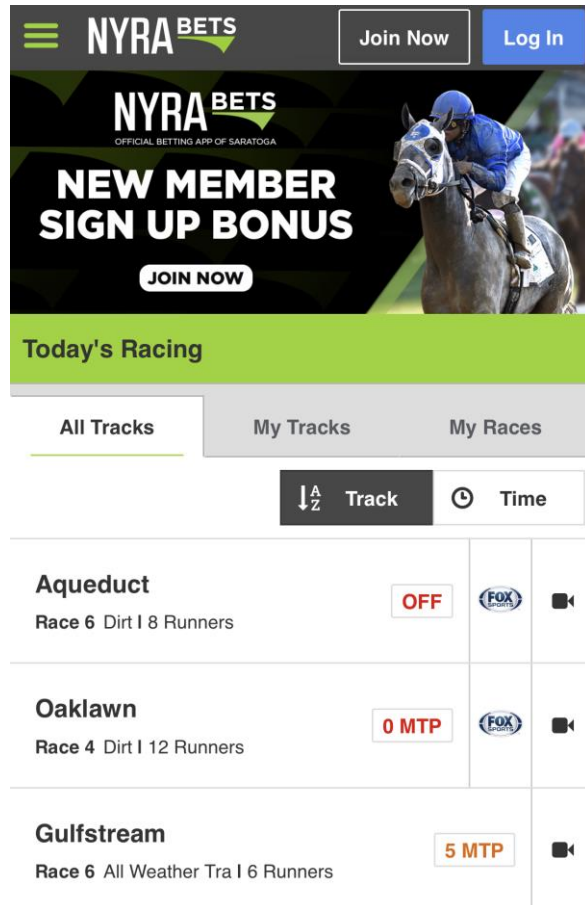


Michael Buckley
Chief Operating Officer

NYRA BETS



NYRA Bets' Marketing Affiliate, Caesars Racebook



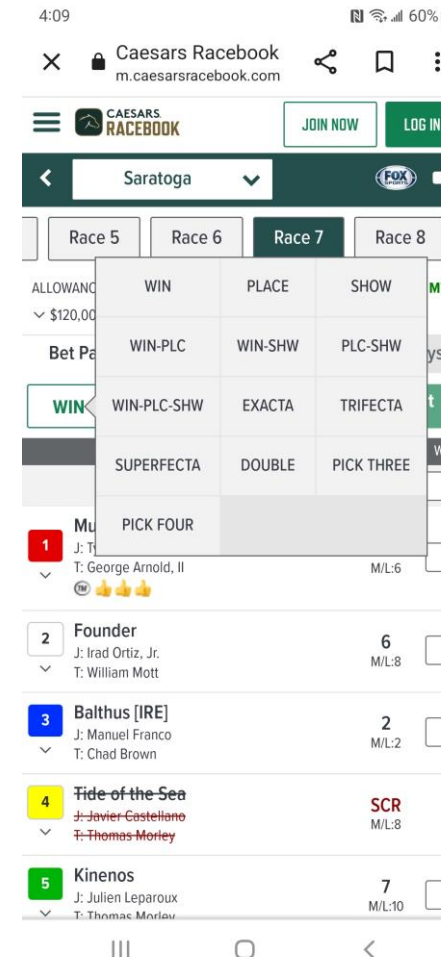
- Having launched in June of 2022, Caesars Racebook is built on the infrastructure of NYRAbets, LLC (“NYRA Bets”)
- NYRA Bets is a national Advance Deposit Wagering (“ADW”) platform owned by The New York Racing Association, Inc. (“NYRA”)
- NYRA is recognized as an industry leader amongst its peers and is at the forefront amongst horse racing content, innovation and wagering

NYRA Bets' Marketing Affiliate, Caesars Racebook

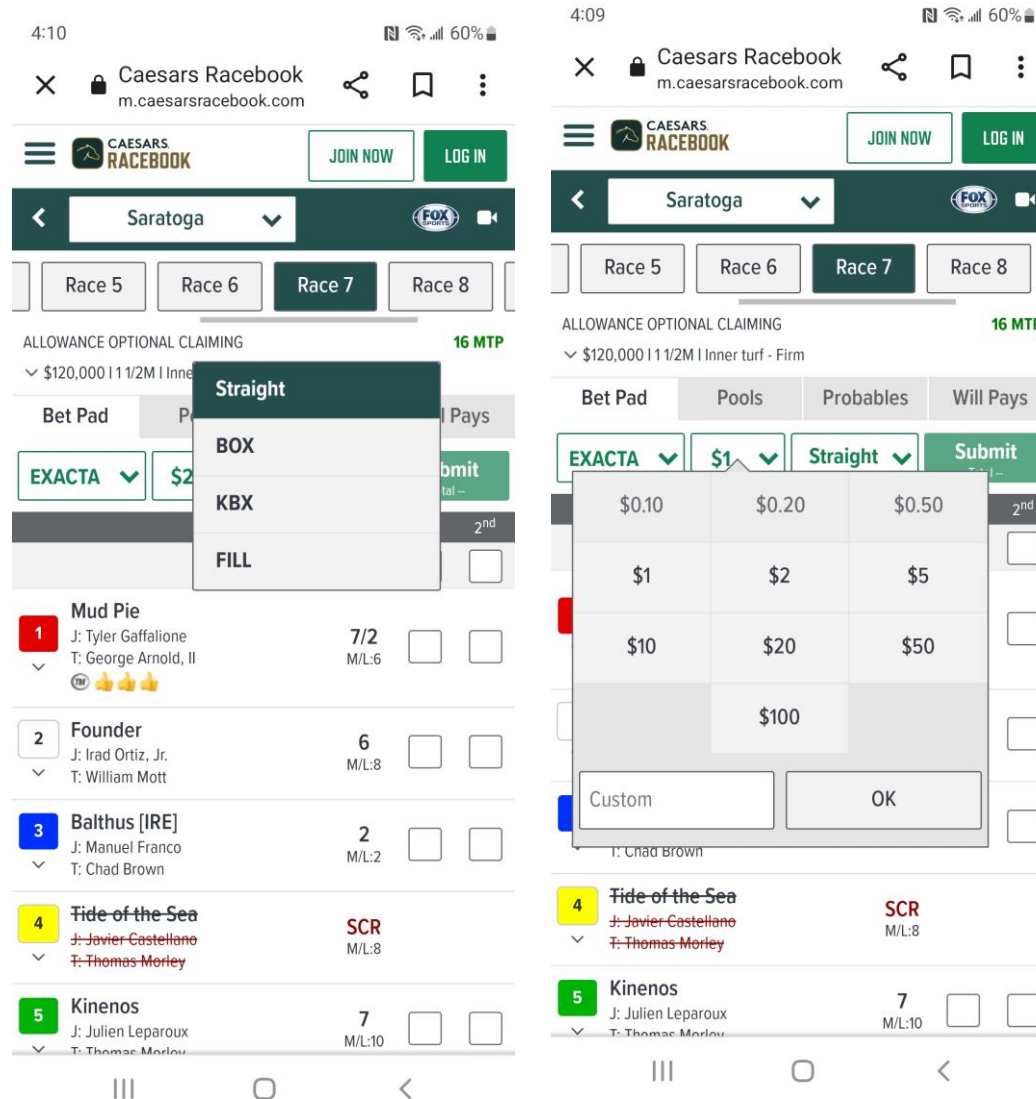
- By using NYRA Bets technology, Caesars Racebook is able to grant its customers access to tracks across the globe for wagering
- NYRA Bets technology delivers HD quality streaming on American and International premium racing content 365 days a year
- NYRA Bets administers all aspects of the racing function provided to Caesars Racebook customers
- Caesars Racebook is a full white label and leverages all of NYRA Bets current funding and KYC mechanisms outlined in the current plan of operations
- Through this partnership with Caesars, NYRA Bets and horse racing in general are granted access to a new target audience

Accessing Caesars Racebook

- In order to access Caesars Racebook, customers simply download the Caesars Racebook app
- Caesars Racebook is currently available to Florida, Indiana, Kentucky, North Dakota, Maryland, Montana, Ohio and Oregon residents
- After creating an account customers have access to a wagering menu which is curated by the NYRA Bets team every day



Leverage Existing Operational Infrastructure



- NYRA Bets administers all aspects of Customer Service for Caesars Racebook
- The NYRA Bets Fraud Mitigation and Player Integrity teams monitor Caesars Racebook for any suspicious wagering and/or funding activity
- The NYRA Bets Finance team facilitates all settlements with other racetrack content providers



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Raynham Park (Massasoit Greyhound Association)
Request for Simulcast Import Locations for 2023

Dear Commissioners:

Massasoit Greyhound Association President George Carney, Jr., has submitted a request for approval of simulcast import locations dated December 1, 2022. These locations usually are approved as part of a racing licensee's application for live racing, however live greyhound racing is not allowed. Under the current statutes, Massasoit (Raynham) is authorized to simulcast without conducting live racing.

Chapter 128 of the Acts of 2022 of the Commonwealth of Massachusetts Section A1 amends Chapter 128C of the General Laws by adding Section 9, which eliminates simulcast wagering on greyhound dog racing. Section 18 states this will take effect on August 1, 2023.

Recommendation: That the Commission approves the Massasoit (Raynham) request for approval of their simulcast import locations for horse racing listed in their December 1, 2022 letter for calendar year 2023.

That the Commission approves the Massasoit (Raynham) request for approval of the simulcast import locations for greyhound dog racing listed in their December 1, 2022 letter until August 1, 2023, consistent with Chapter 128 of the Acts of 2022.



Massachusetts Gaming Commission

Massasoit Greyhound Assn, Inc.
1958 Broadway
Raynham, MA 02767
2023 Simulcast Import Request



December 1, 2022

Via Email

Dr. Alex Lightbown
Director of Racing
Massachusetts Gaming Commission
alexandra.lightbown@massgaming.com

Dear Dr. Lightbown,

Massasoit Greyhound Assn, Inc. asks that the Commission approve the simulcast import signals below for purposes of simulcast wagering in 2023.

<u>2023 IMPORT</u>	<u>TYPE</u>
AJAX DOWNS	THOROUGHBRED
ALBUQUERQUE, THE DOWNS	THOROUGHBRED
AQUEDUCT	THOROUGHBRED
ARAPAHOE PARK	THOROUGHBRED
ARLINGTON	THOROUGHBRED
ASSINIBOIA DOWNS	THOROUGHBRED
BELMONT	THOROUGHBRED
BELTERRA PARK	THOROUGHBRED
BREEDERS CUP	THOROUGHBRED
BREEDERS CUP FUTURE WAGER	THOROUGHBRED
BREEDERS CUP SIRE FUTURE WAGER	THOROUGHBRED
CALIENTE	GREYHOUND
CALIFORNIA FAIRS	THOROUGHBRED
CANTERBURY PARK	THOROUGHBRED
CENTURY DOWNS	THOROUGHBRED
CHARLES TOWN	THOROUGHBRED
CHURCHILL	THOROUGHBRED
DEL MAR	THOROUGHBRED
DELAWARE	THOROUGHBRED
DELTA DOWNS	THOROUGHBRED
DUBAI	THOROUGHBRED
ELLIS	THOROUGHBRED
EMERALD DOWNS	THOROUGHBRED
FAIRGROUNDS	THOROUGHBRED
FAIRMOUNT	THOROUGHBRED
FAIRPLEX	THOROUGHBRED
FINGER LAKES	THOROUGHBRED

1958 Broadway, P.O. Box 172, Raynham, MA 02767 ■ Website: www.raynhampark.net

Phone: (508) 824-4071 ■ Fax : (508) 821-3239

Massasoit Greyhound Assn, Inc.
1958 Broadway
Raynham, MA 02767
2023 Simulcast Import Request

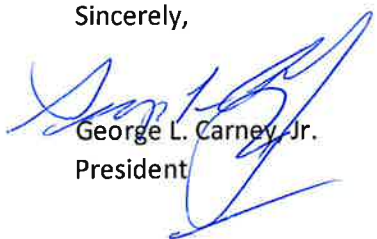
FLAMBORO DOWNS	HARNESS
FONNER PARK	THOROUGHBRED
FORT ERIE RACING	THOROUGHBRED
FREEHOLD	HARNESS
GOLDEN GATE	THOROUGHBRED
GRAND RIVER RACEWAY	THOROUGHBRED
GULFSTREAM	THOROUGHBRED
GULFSTREAM WEST	THOROUGHBRED
HARRAHS @ PHILLY	HARNESS
HARRINGTON	HARNESS
HASTINGS	THOROUGHBRED
HAWTHORNE	HARNESS
HAWTHORNE	THOROUGHBRED
HOOSIER	HARNESS
INDIANA	THOROUGHBRED
IOWA	GREYHOUND
KEENELAND	THOROUGHBRED
KENTUCKY DERBY FUTURE WAGER	THOROUGHBRED
KENTUCKY OAKS FUTURE WAGER	THOROUGHBRED
KENTUCKY SIRE FUTURE WAGER	THOROUGHBRED
KENTUCKY DOWNS	THOROUGHBRED
LAUREL	THOROUGHBRED
LONE STAR PARK	THOROUGHBRED
LOS ALAMITOS	THOROUGHBRED
LOUISIANA	THOROUGHBRED
MAHONING VALLEY	THOROUGHBRED
MEADOWLANDS	THOROUGHBRED
MEADOWLANDS	HARNESS
MEADOWS	HARNESS
MOHAWK	HARNESS
MONMOUTH	THOROUGHBRED
MONTICELLO	HARNESS
MOUNTAINEER	THOROUGHBRED
NORTHFIELD	HARNESS
NORTHLANDS	THOROUGHBRED
OAKLAWN	THOROUGHBRED
OCEAN DOWNS	HARNESS
PARX (PHILADELPHIA PARK)	THOROUGHBRED
PENN NATIONAL	THOROUGHBRED
PIMLICO	THOROUGHBRED
PLAINRIDGE	HARNESS
POCONO	HARNESS
POMPANO	HARNESS
PRAIRIE MEADOWS	THOROUGHBRED
PRESQUE ISLE	THOROUGHBRED
RED MILE	HARNESS
REMINGTON	THOROUGHBRED

Massasoit Greyhound Assn, Inc.
1958 Broadway
Raynham, MA 02767
2023 Simulcast Import Request

RETAMA
ROSECROFT
RUIDOSO DOWNS
SAM HOUSTON
SANTA ANITA
SARATOGA
SARATOGA
SCIOTO DOWNS
SIS RACING
SOUTHLAND GREYHOUND
SUNLAND PARK
SUNRAY PARK
TAMPA BAY
THISTLE DOWN
TIMONIUM
TIOGA DOWNS
TRI-STATE GREYHOUND PARK
TURF PARADISE
TURFWAY
VERNON
WHEELING DOWNS
WILL ROGERS DOWNS
WOODBINE
WOODBINE
WOODLANDS
YONKERS
ZIA PARK

THOROUGHBRED
HARNESS
THOROUGHBRED
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Sincerely,



George L. Carney, Jr.
President

Acts of 2022, Chapter 128

AN ACT TO EXTEND LIVE HORSE RACING AND SIMULCASTING IN THE COMMONWEALTH

Whereas, The deferred operation of this act would tend to defeat its purpose, which is to further regulate simulcasting, therefore it is hereby declared to be an emergency law, necessary for the immediate preservation of the public convenience.

Be it enacted by the Senate and House of Representatives in General Court assembled, and by the authority of the same, as follows:

SECTION A1. Chapter 128C of the General Laws is hereby amended by adding the following section:-

Section 9. Notwithstanding sections 1 to 8, inclusive, or any other general or special law to the contrary, no racing meeting licensee, including a licensee holding racing meetings in connection with a state or county fair, as defined in section 1 of chapter 128A, shall simulcast or accept a simulcast wager on greyhound dog racing.

SECTION 1. The first paragraph of section 12A of chapter 494 of the acts of 1978 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 1 of chapter 27 of the acts of 2021, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 2. The last paragraph of said section 12A of said chapter 494 is hereby amended by striking out the words "July 31, 2022", inserted by section 2 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 3. The introductory paragraph of section 13 of said chapter 494 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 3 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 4. Section 15 of said chapter 494 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 4 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 5. The first paragraph of section 9 of chapter 277 of the acts of 1986 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 5 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 6. The first sentence of the first paragraph of section 3 of chapter 114 of the acts of 1991 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 6 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 7. The last paragraph of said section 3 of said chapter 114 is hereby amended by striking out the words "July 31, 2022", inserted by section 7 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 8. The first paragraph of section 4 of said chapter 114 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 8 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 9. The last paragraph of said section 4 of said chapter 114 is hereby amended by striking out the words "July 31, 2022", inserted by section 9 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 10. The first paragraph of section 5 of said chapter 114 is hereby amended by striking out the words "and until July 31, 2022", inserted by section 10 of said chapter 27, and inserting in place thereof the following words:- and until July 31, 2023.

SECTION 11. Section 45 of chapter 139 of the acts of 2001 is hereby amended by striking out the words "July 31, 2022", inserted by section 11 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 12. Section 20 of chapter 449 of the acts of 2006 is hereby amended by striking out the words "July 31, 2022", inserted by section 12 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 13. Section 92 of chapter 194 of the acts of 2011 is hereby amended by striking out the words "July 31, 2022", inserted by section 13 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 14. Section 112 of said chapter 194 is hereby amended by striking out the words "July 31, 2022", inserted by section 14 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 15. Section 74 of chapter 10 of the acts of 2015 is hereby amended by striking out the words "July 31, 2022", inserted by section 15 of said chapter 27, and inserting in place thereof the following words:- July 31, 2023.

SECTION 16. Section 17 of chapter 27 of the acts of 2021 is hereby repealed.

SECTION 17. Notwithstanding section 2 of chapter 128A of the General Laws and sections 1, 2, 2A and 4 of chapter 128C of the General Laws or any other general or special law to the contrary, the running race horse meeting licensee located in Suffolk county licensed to conduct live racing pursuant to said chapter 128A and simulcast wagering pursuant to said chapter 128C in calendar year 2022 shall remain licensed as a running horse racing meeting licensee until July 31, 2023 and shall remain authorized to conduct simulcast wagering pursuant to said chapter 128C until July 31, 2023; provided, however, that the days between the effective date of this act and July 31, 2023 shall be dark days pursuant to said chapter 128C and the licensee shall be precluded from conducting live racing during that period unless it applies for and is granted a supplemental live racing license pursuant to said chapter 128A; provided further, that all simulcasts shall comply with the Interstate Horse Racing Act of 1978, 15 U.S.C. 3001 et seq. or other applicable federal law; provided further, that all simulcasts from states which have racing associations that do not require approval in compliance with the Interstate Horse Racing Act of 1978, 15 U.S.C. 3004(a)(1)(A) shall require the approval of the New England Horsemen's Benevolent & Protective Association prior to being simulcast to a racing meeting licensee within the commonwealth; and provided further, that if the association agrees to approve the simulcast for 1 racing meeting licensee, it shall approve the simulcast for all otherwise eligible racing meeting licensees.

SECTION 18. Section A1 shall take effect on August 1, 2023.

Approved, August 1, 2022.



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Karen Wells, Executive Director
Todd Grossman, General Counsel

DATE: December 9, 2022

RE: Raynham (Massasoit Greyhound Association)
Request for Account Wagering System

Dear Commissioners:

Massasoit Greyhound Association President George Carney, Jr. has submitted a request for approval of their account wagering program Dial2Bet, which is facilitated by US Off-Track, LLC. This program and affiliation have been in place for approximately 20 years.

Recommendation: That the Commission approves the Massasoit (Raynham) request for approval of Dial2Bet and US Off-Track, LLC for account wagering.

That Dial2Bet, facilitated by US Off-Track, LLC, not accept wagering in Massachusetts on greyhound dog racing after July 31, 2023, consistent with Chapter 128 of the Acts of 2022.



Massachusetts Gaming Commission



December 1, 2022

Via Email

Dr. Alex Lightbown
Director of Racing
Massachusetts Gaming Commission
Alexandra.lightbown@massgaming.com

RE: Massasoit Greyhound Assn, Inc. Request for Approval of 2023 ADW Vendors

Dear Dr. Lightbown,

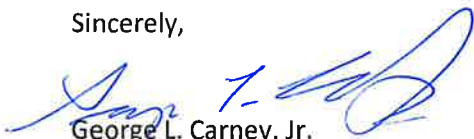
Massasoit Greyhound Assn, Inc. as part of the contract from the simulcast import signals, includes racing content for our account wagering business. A list of our import signals was provided for approval.

Massasoit Greyhound Assn, Inc. currently refers to its telephone wagering program as Dial2Bet. Customers set up their accounts and make additions to and withdrawals from their accounts, at the park. Customers make their wagers calling an 800 number received by US Off-Track, LLC which acts as the wagering phone service. Massasoit Greyhound Assn, Inc. pays a telephone fee for the service. All wagers are included in the daily handle.

Massasoit Greyhound Assn, Inc. respectfully requests the approval to continue providing this service to our customers.

Thank you for your consideration.

Sincerely,


George L. Carney, Jr.
President



TO: Chair Judd-Stein, Commissioners O'Brien, Hill, Skinner and Maynard

FROM: Mark Vander Linden, Director of Research and Responsible Gaming,
Dr. Bonnie Andrews, Research Manager

DATE: December 9, 2022

RE: Sports wagering studies

Attached to this memo are research plans for two studies that are included in the 2022 Act to Regulate Sports Wagering (House Bill No. 5164), and M.G.L Chapter 23N.

- M.G.L. 23N Section 20: Research study examining the feasibility of allowing retail locations in the Commonwealth to operate sports wagering kiosks. The attached document outlines a comprehensive scope for research to be undertaken following a competitive procurement process beginning in January 2023.
- Act Regulating Sports Wagering, Section 25: A research study on the participation by minority business enterprises, women business enterprises, and veteran business enterprises in the sports wagering industry in the Commonwealth. The attached document outlines a comprehensive scope of research that can be undertaken after the launch of sports wagering in the Commonwealth, and sufficient time has passed to assess the industry.

Following feedback and approval by the Commission, the Research and Responsible Gaming Division is prepared to deliver to the Legislature by December 31, 2022, as required by statute.



Massachusetts Gaming Commission



Research Plan for a Prospective Study of the Feasibility and Impact of Sports Wagering Kiosks in Retail Locations

Background

The Massachusetts Gaming Commission is responsible for creating a fair, transparent, and participatory process for implementing the expanded gaming law (2011) and Act to Regulate Sports Wagering (2022). In its creation, the commission established processes designed to:

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

The 2011 Gaming Act required that the commission establish an “annual research agenda” to understand the social and economic effects of expanding gaming in the commonwealth and to obtain scientific information relative to the neuroscience, psychology, sociology, epidemiology and etiology of gambling. For a full text of the Gaming Act please visit <http://massgaming.com/about/expanded-gaming-act/>. The 2022 Act to Regulate Sports Wagering (House Bill No. 5164) Section 23 extends the scope of the research agenda to include an understanding of the effects of sports wagering in the commonwealth.

Study of the Feasibility of Sports Wagering Kiosks

The Act to Regulate Sports Wagering Section 20 requires the MGC to conduct a study into the feasibility of allowing retail locations in the commonwealth to operate sports wagering kiosks.

As required by the new law, this study should address the feasibility, and the potential economic, public health, and safety impacts of such a decision. It should include a discussion and/or evidence-based recommendations that address whether to do so and how to do so in a way that will maximize benefits and minimize negative consequences, including ways to understand and incorporate diversity, equity and inclusion considerations for retailers, consumers, and communities.

What is a Sports Wagering Kiosk

Sports Betting Kiosks provide users with a self-service way to legally place bets, access handicapping services, obtain sports information, and view locally advertised promotions. Traditional sports books have

The successful applicant should consider multiple sources of information including but not limited to studies conducted as part of the MGC research agenda, other academic and non-academic literature, key informant interviews, and economic reports and data. Applicants are also encouraged to think more expansively by including a review of studies showing the impacts of implementation of similar technology; for example, video lottery terminals. Methodology should include a review of jurisdictions with kiosk availability, including the structure, implementation and, where available, data or evaluations on the anticipated and actual impacts of such kiosks to date. Methodology should include consultation with retailers, convenience stores, restaurants, women and minority owned businesses, small business owners, experts from the Massachusetts Lottery, and experts from the Office of the Treasurer and Receiver General, including the Alcoholic Beverages Control Commission.

Research Questions

The study should answer, at a minimum, the following **research questions**:

1. What is the economic impact of the existing sports wagering market on retail establishments that serve alcoholic beverages for on premises consumption, such as restaurants and bars?
2. What are the essential requirements for a retail setting to host a sports wagering kiosk? Including but not limited to:
 - Capacity to comply with social responsibility and other regulatory requirements, including monitoring and data collection requirements
 - Applicability of pre-existing licenses and related compliance infrastructure in retail locations that provide restricted products such as alcohol for on-premises consumption
 - Money-handling capacity and methods for accepting wagers and providing payouts and winnings
 - Human resources capacity and requirements, including skills and training
3. What types of retail settings may be best suited to hosting sports wagering kiosks?
4. What are the anticipated economic impacts of sports wagering kiosks at retail locations?
 - On various types of retail locations? For example, retail establishments that serve alcoholic beverages for on premises consumption, such as restaurants and bars; retail establishments that sell alcohol for off-premises consumption, such as package stores; or retail establishments that do not sell alcohol?
 - For other population groups such as minority communities, or those living far from in-person wagering locations?
 - For minority-owned businesses?
 - For the Commonwealth?
 - For retail locations that do not offer sports wagering kiosks?
5. What are the anticipated impacts on the Massachusetts Lottery, particularly in the context that many of the potential retail locations would likely offer both lottery products and sports wagering?
 - Is there evidence indicating that cannibalization of the lottery by sports wagering kiosks may occur?
 - What is the projected impact on the Lottery's contribution to unrestricted local aid to cities and towns?
 - What are recommendations to mitigate adverse impact to the Lottery's contribution to unrestricted local aid (if adverse impact is projected?)

6. What are the anticipated public health impacts of sports wagering kiosks at retail locations, and particularly public health impacts for populations most at-risk for problem gambling?
 - What kinds of measures should be considered to promote responsible gaming in order to minimize gambling-related harm and maximize player choice?
7. What are the anticipated security, safety, and potential crime-related impacts of sports wagering kiosks at retail locations?
 - For consumer protection and enforcement of age restrictions?
8. What is the anticipated market recapture from the black market if sports wagering kiosks are available at retail locations?
 - What are the anticipated economic and public health impacts of market recapture, particularly in communities far from authorized in-person sports wagering?
9. What is the anticipated impact on minors of sports wagering kiosks at retail locations which allow persons under the age of 21 to enter?
 - What measures should be considered to prevent persons under the age of 21 accessing a sports wagering kiosk in a restaurant or bar which permits persons under the age of 21 to enter?
10. What if any, are the anticipated cannibalization effects on casino and sports wagering operators licensed by the MGC?
11. If kiosks are implemented in retail settings, how frequently should public health, safety, and economic impacts of sports wagering kiosks be reassessed by the Commission?

Additional research questions or topics are welcome, provided they address the issues of feasibility and impact of sports wagering kiosks at retail locations.

The proposal should clearly detail how the proposed methods will answer each research question.

Budget

Anticipated funding available for this feasibility study will be approximately \$100,000-\$150,000.

Research Team Qualifications

The teams and individuals selected to carry out the research should have the following qualifications and experience:

- In-depth knowledge of research methods in the related subject areas
- Experience and expertise in qualitative and quantitative research
- Experience and expertise garnering community input and understanding for research impacting communities
- Experience and expertise in the analysis of factors and covariant indicators of economic development
- Understanding of the gambling landscape in Massachusetts
- Understanding the mission and goals of the Massachusetts Gaming Commission

- Demonstrated experience in knowledge translation for a range of target audiences
- Understanding the associations and influence of social determinants of health on behaviors, behavioral outcomes, and health outcomes
- Knowledge of other bodies of research work in the areas of problem gambling and economic development
- Demonstrated experience designing, managing and coordinating complex research projects
- Illustration of a commitment to diversity through composition of research team and/or participants, partnerships, and/or use of certified diverse vendors/subcontractors on the project

Timeline

This scoping document will inform the development of a competitive RFR with an anticipated release in January 2023.

DRAFT

Appendix: Statutes and Regulations Pertaining to Sports Wagering Kiosks in Non-Gaming Settings such as Restaurants and Bars

Methodology: A search was conducted using the “Odds on Compliance” database about what state statutes and regulations exist permitting sports wagering kiosks to be placed/used in a non-gaming setting like a restaurant or a bar. Research was limited to the following nine states that the American Gaming Association (AGA) identified as allowing these kinds of kiosks: Arizona, Connecticut, Delaware, Kansas, Louisiana, Maryland, Montana, Ohio, and Washington DC.

Each state’s individual page in the database and was reviewed, and the search focused on the documents listed under the headings, “Statute” and “Regulation.” Within those documents, there was a search for keywords that are relevant to this issue. “Kiosk” was referenced in different ways depending on the state, so also included is a column in the chart below about alternative terms used to reference “kiosk” in statutes and regulations. Examples include “equipment,” “machine,” and “electronic.” Then once language (if any) was found that referenced kiosks, a further search was completed for any mention of a “bar,” “restaurant” or “public accommodation.”

To be noted is that some states had minimal statutes and regulations referencing kiosks in non-casino settings, though the AGA initially identified them as allowing it.

State	Format	“Kiosk” Terms	Statute/Regulation RE: Kiosks	Statute/Regulation RE: Kiosks in Non-Casino Restaurants & Bars?
Arizona	Online & Retail	“Kiosk” “Event Wagering Devices”	<u>(Regulation) Article 1. Event Wagering R19-4-101. Definitions</u> 10. “Event Wagering System” means the hardware, software, firmware, communications technology or other equipment to allow patrons to place event wagers,	<u>(Statute) Title 5: Amusements and Sports. Chapters 5.1, 6, 10, 11</u> 5-1205. Prohibitions; Exceptions. C. A fantasy sports contest may not be offered on, at or from any of the following: 1. A kiosk or machine open to public use and physically located in a retail business location, bar, restaurant or other commercial establishment. 2. A kiosk or machine open to public use and physically located in a place of public accommodation, except that a

			<p>regardless of whether event wagers are offered at retail,</p> <p>to include kiosks, and/or over the internet on an event</p> <p>wagering platform.</p> <p>16. “Kiosk” means a device located within a retail</p> <p>wagering area that interfaces with an event</p> <p>wagering</p> <p>system and may be utilized by a patron to place</p> <p>event</p> <p>wagers, redeem winning tickets, redeem</p> <p>vouchers,</p> <p>open a player account, and make player</p> <p>account</p> <p>deposits and withdrawals.</p>	<p>fraternal organization or veterans' organization as defined in section 5-401 or a licensed racetrack may operate up to two kiosks for the sole purpose of offering fantasy sports.</p> <p>(Statute) Title 5, Chapter 11: Event Wagering</p> <p>5-1303: Event Wagering; License Required; Exception. E. A person may not provide or make available event wagering devices in a place of public accommodation in this state, including a club or other association, to enable individuals to place wagers except as provided by this chapter. This subsection does not apply to an event wagering operator aggregating, providing or making available event wagering devices within its own event wagering facility.</p>
Connecticut	Online & Retail	<p>“Kiosk”</p> <p>“Automated wagering systems or machines”</p>	<p>(Statute) Substitute HB No. 6451 – iGaming, Sports Betting, Fantasy and Online Lottery Act</p> <p>Sec. 29. Section 12-806 of the General Statutes. (b) The corporation shall have the following powers: (4)(A) To introduce new lottery games, modify existing lottery games, utilize existing and new technologies, determine distribution channels for the sale of lottery tickets, introduce keno pursuant to</p>	[None found]

			<p>signed agreements with the Mashantucket Pequot Tribe and the Mohegan Tribe of Indians of Connecticut, in accordance with section 12-806c, as amended by this act, or pursuant to section 4 of this act, and, to the extent specifically authorized by regulations adopted by the Department of Consumer Protection pursuant to chapter 54, introduce instant ticket vending machines, kiosks and automated wagering systems or machines, with all such rights being subject to regulatory oversight by the Department of Consumer Protection;...</p>	
<p>Delaware</p>	<p>Retail</p>	<p>“Sports lottery machine”</p>	<p><u>(Statute) 204 Delaware Sports Lottery Rules and Regulations</u></p> <p>2.0 Definitions. “Sports lottery machine” or “terminal” means any machine in which bills, coins or tokens are deposited in order to play a sports lottery game. A machine shall be considered a sports lottery machine notwithstanding the use of an electronic credit system making the deposit of the bills, coins or tokens unnecessary.</p>	<p><u>(Statute) 204 Delaware Sports Lottery Rules and Regulations</u></p> <p>3.0 Licensing of Agents (3.9 Site Evaluation Criteria). The Director shall weigh the following factors, as well as other objective business site evaluation criteria, to determine the suitability of the applicant’s business site locations as licensed retailer locations for sports lottery games: 3.9.1 Customer traffic count; 3.9.2 Business hours; 3.9.3 Available parking; 3.9.4 Trade style (i.e., products sold); 3.9.5 Product exposure within the location; 3.9.6 Security of sports lottery machines and systems; 3.9.7 Nearest licensed retailer of similar trade style; and 3.9.8 Convenience of accessibility to Lottery products and services within a community or commercial cluster.</p>

<p>Kansas</p>	<p>Online & Retail</p>	<p>“Sports wagering kiosk”</p>	<p><u>(Regulation) Sports Wagering Regulations</u></p> <p>112-201-1. Definitions. (u) “Sports wagering kiosk” means an automated device that may be used for sports wagering ticket processing and other automated functions as approved by the executive director.</p>	<p><u>(Statute) SB84 – Sports Betting Bill</u></p> <p>Sec. 24. K.S.A. 74-8702 is hereby amended to read as follows: 74-8702. As used in the Kansas lottery act, unless the context otherwise requires: (a) "Ancillary lottery gaming facility operations" means additional non-lottery facility game products and services not owned and operated by the state which that may be included in the overall development associated with the lottery gaming facility. Such operations may include, but are not limited to, restaurants, hotels, motels, museums or entertainment facilities.</p> <p><u>(Regulation) Sports Wagering Regulations</u></p> <p>112-201.22. Sports Wagering Transactions (c) Sports wagering transactions shall be conducted from: (2) Sports wagering kiosks in locations as approved by the executive director.</p>
<p>Louisiana</p>	<p>Online & Retail</p>	<p>“Kiosk” “Sports wagering mechanism”</p>	<p><u>(Statute) Title 27. Louisiana Gaming Control Law., Chapters 1-10</u></p> <p>RS 27:602 – §602. Definitions. (25) "Sports wagering mechanism" or "kiosk" means a board-approved self-service mechanical, electrical, or computerized terminal, device, apparatus, or piece of equipment that is directly tied to a licensee's approved sports wagering platform that allows a patron to place</p>	<p><u>(Statute) Title 27. Louisiana Gaming Control Law., Chapters 1-10</u></p> <p>RS 27:602 – §602. Definitions. (10) "Licensed establishment" means an establishment that has a Class A-General retail permit or a Class A-Restaurant permit as defined in Part II of Chapter 1 or Part II of Chapter 2 of Title 26 of the Louisiana Revised Statutes of 1950, for the sale of alcoholic beverages for on-premises consumption</p>

			<p>a sports wager in a board-approved location on a licensee's premises. "Sports wagering mechanism" does not include a personal computer, mobile phone, or other device owned and used by a player to wager on a sports event.</p> <p>RS 27:609 - §609. Electronic wagering; kiosk; mobile wagering. (B) Sports wagering mechanism. (1) A player may place a wager via a sports wagering mechanism with cash or vouchers or by utilizing the player's established sports wagering account. (2) Sports wagering mechanisms shall be located only on a licensee's premises in areas where accessibility is limited to patrons twenty-one years of age or older.</p>	<p>or a Louisiana state racing commission licensed race track, pari-mutuel wagering facility, or offtrack wagering facility, or a qualified truck stop facility as defined in R.S. 27:417. Licensed establishment shall not include any premises leased to or utilized by a bona fide nonprofit organization for the conducting of charitable gaming nor any convenience store, quick-stop, food-mart, service station, grocery store, barber shop, laundromat/washateria, package or discount liquor/cigarette establishment, movie theater, or beauty shop.</p> <p>(14) "Restaurant, bar, tavern, cocktail lounge, or club" means an operating establishment primarily engaged in the retail sale of prepared foods or the sale of alcoholic beverages for on-premises or immediate consumption that has been granted a Class A-General retail permit or a Class A-Restaurant permit, as defined in Part II of Chapter 1 or Part II of Chapter 2 of Title 26 of the Louisiana Revised Statutes of 1950, for the sale of alcoholic beverages for on-premises consumption.</p> <p><u>(Regulation) Title 42. Louisiana Gaming</u></p> <p>§2415. Gaming Establishments. 1. The division may issue a license to qualified applicants based on the type of business being conducted. The</p>
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				types of licenses and the requirements for these licenses are as follows: a. Type "I" License—any bar, tavern, cocktail lounge, or club only, as defined in R.S. 27:402(14) shall be designated as a type "I" establishment; b. Type "II" License—any restaurant, as defined in R.S. 27:402(14) shall be designated as a type "II" establishment...
Maryland	Online & Retail	<p>"Kiosk"</p> <p>"Sports wagering equipment"</p>	<p><u>(Regulation) Title 36 Maryland State Lottery and Gaming Control Agency, Subtitles 01-10</u></p> <p>.02 Definitions. (36) "Kiosk" means a Commission-approved device that may be used by a bettor to place a wager and may be used to redeem a winning wager.</p> <p>(76) "Sports wagering equipment" means any mechanical, electronic or other device, mechanism, software or equipment, and related supplies used or consumed in the operation of sports wagering, including a self-service kiosk on the premises of a sports wagering facility.</p>	<p><u>(Regulation) Title 36 Maryland State Lottery and Gaming Control Agency, Subtitles 01-10</u></p> <p>.08 In-person Wagering at Sports Wagering Facilities. B. A sports wagering facility licensee may accept a wager made by an individual who is physically present at a sports wagering facility on sports wagering equipment that is a self-service device approved by the Commission including a: (1) Kiosk; (2) Machine; or (3) Other device.</p>
Montana	Online & Retail	[None found]	[None found]	[None found]
Ohio	Online & Retail	"Sports gaming terminal"	<p><u>(Statute) Sports Gaming Act</u></p> <p>Sec. 3775.01. (P) "Sports gaming equipment" means any of the following that directly relate to or affect, or are used or consumed in, the</p>	<p><u>(Statute) Sports Gaming Act</u></p> <p>Sec. 3775.07. (A)(1) The owner of a facility with a D-1, D-2, or D-5 liquor permit issued under Chapter 4303. of the Revised Code who offers</p>

			operation of sports gaming: (1) Any mechanical, electronic, or other device, mechanism, or equipment, including a self-service sports gaming terminal...	sports gaming through a type C sports gaming proprietor using self-service or clerk-operated sports gaming terminals located at the facility shall hold an appropriate and valid type C sports gaming host license issued by the Ohio casino control commission at all times.
Washington D.C.	Online & Retail	<p>“Kiosk”</p> <p>“Sports wagering equipment”</p> <p>“Self-service betting terminal”</p>	<p><u>(Statute) Sports Wagering Lottery Amendment Act of 2018</u></p> <p>(18) "Sports wagering equipment" means a mechanical, electronic, or other device, mechanism, or other gaming equipment, and related supplies used or consumed in the operation of sports wagering at a licensed sports wagering facility, including a self-service terminal installed to accept sports wagers.</p> <p><u>(Regulation) Notice of Final Rulemaking (Privately Operated Sports Wagering)</u></p> <p>2199.1 Definitions. “Sports Wagering Equipment” means any mechanical, electronic or other device, mechanism, or equipment, and related supplies used or consumed in the operation of sports wagering at a licensed Sports Wagering Facility including, but not limited to, a Self-Service Betting Terminal or kiosk installed to accept sports wagers.</p>	<p><u>(Regulation) Sports Wagering Minimum Internal Control Standards (MICS)</u></p> <p>Section 14.0 – Self-Service Betting Terminals (SSBTs/Kiosk). 14.3 – Access to SSBTs. 14.3. Access to SSBT. The internal controls in respect of access to SSBTs must include, but not be limited to, the following: a. Control measures to ensure that only authorized, registered employees of the Licensee, registered employees on a Sports Wagering Facility, and an OLG licensed Supplier, may access the secure area of a SSBT. b. The requirement that all doors of the SSBTs are secured at all times. c. The requirement of recording of relevant entries in a log each time a SSBT is accessed (MEAL).</p>



Research Plan for a Study of the Participation by Minority, Women, and Veteran Business Enterprises in the Sports Wagering Industry in Massachusetts

Background

The Massachusetts Gaming Commission (MGC) is responsible for creating a fair, transparent, and participatory process for implementing the expanded gaming law (2011) and Act to Regulate Sports Wagering (2022). In its creation, the commission established processes designed to:

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

The 2011 Gaming Act required that the commission establish an “annual research agenda” to understand the social and economic effects of expanding gaming in the commonwealth and to obtain scientific information relative to the neuroscience, psychology, sociology, epidemiology and etiology of gambling. For a full text of the Gaming Act please visit <http://massgaming.com/about/expanded-gaming-act/>. The 2022 Act to Regulate Sports Wagering (House Bill No. 5164) Section 23 extends the scope of the research agenda to include an understanding of the effects of sports wagering in the commonwealth.

Global and National Context

Several initiatives have involved monitoring diversity, equity, and inclusion initiatives across the gaming industry. The All-In Diversity Project, an industry-led not-for-profit initiative seeking to benchmark diversity, equality and inclusion across the global betting and gaming industry, released a report concerning the sector’s workforce covering the period 2020-2021 (to account for the impact of the pandemic). This report noted that the number of males (56%) exceeded the number of females (43%) for the first time in 5 years, that the biggest gap was at entry level, and noted this was a “real cause for

concern when looking at long term prospects for role models, mentors and talent pools.”¹ Globally, of note for sports wagering is the projection that “women’s sport is growing at a faster rate” than men’s- “cue an increase in female sports betting markets and female sports-bettors.”²

In 2018, the U.S. Chamber of Commerce Foundation’s Corporate Citizenship Center, in conjunction with the American Gaming Association (AGA) conducted a survey of 15 AGA member respondents representing 168 United States member properties concerning corporate social responsibilities. While the survey speaks to the gaming industry vs. sports wagering specifically, the survey found that 69% of respondents reported having “an institutionalized diversity and inclusion hiring effort,”³ 45% reported having diversity and inclusion retention strategies, and 29% reported having employee affinity or resource groups. They compared these results to findings from a 2014 Diversity and Inclusion survey of human resources professionals from many different industries conducted by the Society for Human Resource Management indicating percentages of 57%, 38%, and 15% respectively.⁴ In 2021, the AGA conducted an industry-wide assessment of member activities related to Environment, Social and Governance issues, which captured how member organizations were prioritizing strengthening diversity, equity, and inclusion initiatives. While not specific to the sports wagering industry, the AGA report provided case examples from member organizations that offer sports wagering products.⁵

Study of the Participation by Minority, Women, and Veteran Business Enterprises in the Sports Wagering Industry in the Commonwealth

The Massachusetts Gaming Commission is working with licensees, their contractors, vendors, and community leaders to ensure that the state’s new expanded gaming industry is inclusive and provides opportunities that reflect the diversity of the Commonwealth.

The 2011 Expanded Gaming Act required casino applicants to establish training programs that promote the development of a skilled and diverse workforce. The casino application process required all gaming applicants to set diversity hiring goals and submit strategic plans for the inclusion of minorities, women and veterans in the workforce. Applicants were also required to formulate their own specific diversity goals related to minority-, women- and veteran-owned businesses to participate as contractors in all stages of building their gaming establishments (design, construction, and operation). Casinos are also required to regularly provide to the Commission detailed, statistical reports on the diversity of their workforce and vendor contracting. In July 2021, the Diversity and Legislative Affairs division of the MGC released its third report chronicling industry insights regarding impacts to local businesses, workforce and diversity measures covering the 2019 calendar year. According to this report:

- Of casino construction and operations employees, more than 4,300 were minority, 3,200 were women, and nearly 400 were veterans;
- Casino licensees spent more than \$64 million with diverse vendors and suppliers.⁶

¹ All-In Diversity Project (2022). Gen Z, Great Resignation and the Menopause all reflected in latest All-Index® industry report (allindiversityproject.com). Available from: [Gen Z, Great Resignation and the Menopause all reflected in latest All-Index® industry report \(allindiversityproject.com\)](https://www.allindiversityproject.com/_files/ugd/b41121_d2357e0c40cf4c258203000af38306a9.pdf)

² All-In Diversity Project (2022). All-Index ® 2021/22 Annual Report. Available from: [https://www.allindiversityproject.com/_files/ugd/ b41121_ d2357e0c40cf4c258203000af38306a9.pdf](https://www.allindiversityproject.com/_files/ugd/b41121_d2357e0c40cf4c258203000af38306a9.pdf)

³ [Responsibility in the Gaming Industry - American Gaming Association](#)

⁴ American Gaming Association (2019). Corporate Social Responsibility in the Gaming Industry. Retrieved from: [CSR Gaming Industry Report.pdf \(americangaming.org\)](#)

⁵ American Gaming Association (2022). Responsibility in Gaming: The Path Toward ESG. Available from: [AGA ESGCompendiumSpring22.pdf \(americangaming.org\)](#)

⁶ Massachusetts Gaming Commission (2022). Massachusetts Gaming Commission Annual Report 2021. Available from: [MGC-Annual-Report-2021.pdf \(massgaming.com\)](#)

The 2021 Massachusetts Gaming Commission Annual Report also included information concerning licensee workforce and supplier diversity goals:⁷

Results on Licensee Workforce and Supplier Diversity Goals

All data is provided from the 2021 Q2 reporting period.

MGC staff continue to monitor the impact the closures had on the local workforce and procurement.

Operational Diversity

WORKFORCE						
	MBE		VBE		WBE	
	Goal	Result	Goal	Result	Goal	Result
Encore Boston Harbor	40%	55%	3%	3%	50%	43%
MGM Springfield	50%	52%	2%	7%	50%	42%
Plainridge Park	15%	24%	2%	6%	50%	40%

SUPPLIER						
	MBE		VBE		WBE	
	Goal	Result	Goal	Result	Goal	Result
Encore Boston Harbor	8%	12%	3%	2%	14%	14%
MGM Springfield	10%	1.2%	2%	1.5%	15%	4.4%
Plainridge Park	6%	5%	3%	3%	12%	19%

The 2022 Act to Regulate Sports Wagering Section 25 requires the MGC to build upon the existing research, and conduct a study on the participation by minority, women, and veteran business enterprises in the sports wagering industry in the commonwealth.

Study Requirements

The MGC will seek the services of at least one qualified entity to conduct a study on the participation by minority, women, and veteran business enterprises in the sports wagering industry in the commonwealth. The study must include methods for increasing racial and gender diversity in the workforce in the sports wagering industry, including whether to set reasonable and appropriate goals and procedures for increasing the number of minority business enterprises providing sports wagering industry-related services to sports wagering licensees and employers.

The successful applicant should consider multiple sources of information including but not limited to information from licensees; licensee, industry-specific, local, state, and national employment data stratified by gender, race/ethnicity, and veteran status; studies conducted as part of the MGC research agenda; other academic and non-academic literature; key informant interviews; and economic reports and data.

Research Questions

The study should answer, at a minimum, the following **research questions**:

- What is the participation of minority, women, and veteran business enterprises in the commonwealth in activities related to the regulation, licensing and promotion of sports wagering operators?
 - As a percentage of total participation and dollars spent?
 - As mean and median contract size compared to total?

⁷ See footnote 6 for reference.

- Compared to similar industries?
- What kinds of organizational policies and practices are in place related to solicitation of and contracting with minority, women, and veteran business enterprises in the commonwealth for organizations and agencies engaging in these activities?
- What is the level of participation of women, minority and veteran employees working for sports wagering licensees and employers?
 - As a percentage of total participation?
 - At different levels of employment within organizations?
 - Compared to similar industries?
 - What kinds of organizational policies and practices are in place related to recruitment and retention of a diverse workforce?
 - What kinds of considerations are there related to employment impact, compensation, benefits, trajectory, and turnover for women, minority, and veteran employees compared to employees from other groups?
- What is the level of participation by minority-owned and women-owned businesses that contract with or provide services to sports wagering licensees and employers?
 - As a percentage of total participation and dollars spent?
 - As mean and median contract size compared to total?
 - Compared to similar industries?
 - What kinds of organizational policies and practices are in place related to solicitation of and contracting with minority, women, and veteran business enterprises in the commonwealth?
- What are the barriers to employment of women and minorities in the sports wagering industry?

The proposal should clearly detail how the proposed methods will answer each research question.

Timeline

An evaluation of participation by minority, women, and veteran business enterprises in the sports wagering industry should take place long enough after implementation of sports wagering that preliminary findings may be assessed, but early enough to inform and maximize potential improvements in processes. We thus anticipate engaging in a procurement process to select an entity to conduct this evaluation by July 2023, with initiation of the evaluation by September 2023. We anticipate including this study in the gaming research agenda in FY24 with advice from the Gaming Policy Advisory Committee and approval from the Massachusetts Gaming Commission.

Budget

Anticipated funding available for this study will be approximately \$100,000-150,000.

Research Team Qualifications

The preferred teams and individuals providing selected to carry out the research will have the following qualifications and experience:

- In-depth knowledge of qualitative and quantitative methods in the related subject areas
- Knowledge of other bodies of research in related areas
- Specific experience and expertise in conducting diversity, equity and inclusion research within the gaming and hospitality/resorts industry
- Illustration of a commitment to diversity through composition of research team and/or participants, partnerships, and/or use of certified diverse vendors/subcontractors on the project
- Experience and expertise in the analysis of factors and covariant indicators of economic development
- Demonstrated experience in knowledge translation for audiences of different backgrounds and

diverse skills

- Understanding of the Massachusetts Gaming Act and Act Regulating Sports Wagering
- Understanding the mission and goals of the Massachusetts Gaming Commission
- Demonstrated experience designing, managing and coordinating complex, multi-disciplinary research projects like the one proposed in this RFR

DRAFT



2022 ANNUAL REPORT

ABOUT THE COMMISSIONERS



**Cathy Judd-Stein
(Chair)**
February 2019 – Current
Governor’s Appointee



Eileen O'Brien
April 2018 – Current
Attorney General’s Appointee
Criminal Investigations
and Law Enforcement



Brad Hill
September 2021 – Current
Joint Appointment –
Governor, AG, Treasurer
Gaming Regulatory or
Gaming Industry Management



Nakisha Skinner
March 2022 – Current
Treasurer’s Appointee
Corporate Finance
and Securities

We also welcome our newest commissioner who joined just after the fiscal year’s end.



Jordan Maynard
August 2022 – Current
Joint Appointment –
Governor, AG, Treasurer
Legal and Policy Issues
Related to Gaming

A special thank you to former commissioner, **Gayle Cameron** who departed during FY22 after ten years of service with the MGC!

CASINO LICENSEE OVERVIEW

PLAINRIDGE PARK CASINO

PPC is the category 2 licensee in Plainville, Massachusetts. The facility also hosts the Standardbred live racing and simulcasting operations.



Conditional Award of the License	February 2014
Operations Certificate/Date Opened	June 24, 2015
Gaming Space	43,800 sq. ft.
Total Gross Area	197,679 sq. ft.
Capital Investment Amount	\$250 million
Total Employment	342 employees (231 full-time, 109 part-time)
Tax on Gross Gaming Revenues	49%
Parking	1,575 patron spaces (1,818 total)
Slots	904 slots
Table Games	N/A
Additional Amenities	2 full-service restaurants ("Flutie's Sports Bar" and "Slack's Oyster House & Grill") 4 food-court style eateries ("Smashburger" "Dunkin' Donuts" "Slice" "Grab & Game"] Live Entertainment ("Revolution Lounge"). Live harness racing April through November. Additional racing concessions/outlets.

*Data reflects property status as of June 30, 2022.



MGM SPRINGFIELD

MGM is a category 1 licensee for Region B in Springfield, Massachusetts. The facility is located on approximately 14 acres in downtown Springfield in the congregation of parcels bound by Main, State, Union, and East Columbus streets.



Conditional Award of the License	June 2014
Opening Date	August 24, 2018
Gaming Space	126,262 sq. ft.
Total Gross Area	759,157 sq. ft.
Total Investment Amount	\$960 million**
Tax on Gross Gaming Revenues	25%
Parking	3,375 covered on site
Total Employment	1,244 employees (843 full-time, 234 part-time, 167 on call)
Slots	1,527 slots
Table Games	62 tables (14 Poker)
Additional Amenities	240 room hotel (20 rooms converted to 10 larger suites), 8 food and beverage outlets, 26,000 sq. ft. of retail space, bowling alley, cinema, and 54 residential units.

*Data reflects property status as of June 30, 2022. **Does not include \$60.7 million for land and \$75.5 million for capitalized interest.



ENCORE BOSTON HARBOR

EBH is a category 1 licensee for Region A in Everett, Massachusetts. The facility sits on the formerly contaminated site on the banks of the Mystic River at the site of the former Monsanto plant.



Conditional Award of the License	September 2014
Opening Date	June 23, 2019
Gaming Space	190,461 sq. ft.
Total Gross Area	3.1 million sq. ft.
Total Investment Amount	\$2.6 billion
Total Employment	3,395 employees (2,353 full-time, 1,042 steady extra)
Tax on Gross Gaming Revenues	25%
Parking	2,800 spaces
Slots	2,728 slots
Table Games	199 tables (12 Poker)
Additional Amenities	5-star hotel (671 rooms), 7,776 sq. ft. of retail space, 13 food and beverage outlets, 4 bars and lounges, multipurpose venue, 5-star spa/gym, convention space, extensive outdoor and waterfront space with pavilion and public harbor walk, indoor garden.

*Data reflects property status as of June 30, 2022.

