



NOTICE OF MEETING AND AGENDA

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

Thursday | March 30, 2023 | 10:00 a.m.
VIA REMOTE ACCESS: 1-646-741-5292
MEETING ID/ PARTICIPANT CODE: 112 233 7338
All meetings are streamed live at www.massgaming.com.

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

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

PUBLIC MEETING - #446

1. Call to Order – Cathy Judd-Stein, Chair
2. Investigations and Enforcement Bureau – Loretta Lillios, Director of Investigations and Enforcement Bureau; Kathleen Kramer, Senior Enforcement Counsel
 - a. Massasoit Greyhound Association Application for Category 2 Sports Wagering License – Review of Applicant's Operating Lease Agreement with American Wagering, Inc. (Caesars Sportsbook)

I. Executive Session

VOTE

The Commission anticipates that it may meet in executive session in conjunction with its review of the Massasoit Greyhound Association, Inc. ("MGA") application for a category 2 sports wagering operator license in accordance with G.L. c. 30A, § 21(a)(7) and G.L. c. 23N, § 6(i) to consider information submitted by the applicant in the course of its application for such license relative to the operating lease agreement between MGA and American Wagering, Inc. that is a trade secret, competitively-sensitive or proprietary, and which if disclosed publicly would place the applicant at a competitive disadvantage, and/or in accordance with G. L. c. 4, § 7(26)(n) (certain records for which the public disclosure is likely to jeopardize public safety or cyber security) to



Massachusetts Gaming Commission

consider information related to the security or safety of persons or buildings, structures, facilities, utilities, transportation, cyber security or other infrastructure located within the commonwealth, the disclosure of which is likely to jeopardize public safety or cyber security.

- b. Disclosure by Betr Holdings, Inc. (Category 3 Licensee) relating to SEC matter
3. Sports Wagering – Bruce Band, Director of Sports Wagering, Sterl Carpenter, Operations Manager, Division of Sports Wagering
 - a. Commission Approval of House Rules for Betr Holdings, Inc. (D/B/A Betr) **VOTE**
4. Legal – Todd Grossman, General Counsel; Carrie Torrisi, Deputy General Counsel; Caitlin Monahan, Deputy General Counsel
 - a. Withdrawal of Pointsbet Massachusetts, LLC application for a Category 3 Sports Wagering License **VOTE**
 - b. Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N **VOTE**
5. Racing –Alex Lightbown, Director of Racing
 - a. FanDuel Request for Approval to Enable Access Points to FanDuel Racing Within the FanDuel Sportsbook- Cory Fox, FanDuel Vice President for Product and New Market Compliance and Josh Mehta, FanDuel Counsel Director, Gaming Regulatory & Product Advisory **VOTE**
6. FY24 Research Agenda – Mark Vander Linden, Director of Research and Responsible Gaming
7. Commissioner Updates
8. Other Business - Reserved for matters the Chair did not reasonably anticipate at the time of posting.



Massachusetts Gaming Commission

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: March 28, 2023 | 10 a.m. EST

March 28, 2023

Cathy Judd-Stein

Cathy Judd-Stein, Chair

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



Massachusetts Gaming Commission

Massachusetts House Rules

1. Types of Sports Wagers Accepted

- “Moneyline” is where it is possible to bet on the (partial or definite) outcome of a match or event.
- “Correct Score” is where it is possible to bet on the exact score of a match/event, or part of it.
- “Over/Under” is where it is possible to bet on the (partial or definite) amount of a predefined occurrence (e.g. goals, points, corners, rebounds, etc.). Should the total amount of the listed occurrences be exactly equal to the betting line, then all bets on this offer will be declared void.
- A “Head-to-Head” is a competition between two or three participants/outcomes, originating from either an officially organized event, or else, as virtually defined by Betr.
- “Half time/Full time” is where it is possible to bet on the result in Half time and the outcome at the end of the listed timeframe.
- “Period betting” is where it is possible to bet on the outcome of each separate period within a match/event.
- “Draw No Bet” (aka Moneyline) is where it is possible to bet on a team to win but the wager is void if the event ends in a draw.
- “Against the Spread” is a wager on a team to win a game, or subset of a game, while adding or subtracting a set number of points from the score.
- “Double Chance” is where it is possible to bet simultaneously on two outcomes of a match or event. Example: Team USA Soccer to win or draw
- “Outright” or “Place” is selecting a participant from a contest or event to win the event outright or to place in the top set number of participants.
- “Proposition wager” is where it is possible to choose a statistical subset of a game being played, examples include “result of next drive”, “next pitch ball/strike”, “total yards rushing by a running back”.

2. Minimum and Maximum Sports Wagers

- Betr’s universal minimum wager amount is: \$0.10
- Betr’s universal maximum wager amount is: \$500,000.00
- Betr maintains the sole right and has the ability to limit the maximum bet amount for any wager placed on its platform.
- Minimum and maximum wager limits vary depending on the sport, the type of competition and the type of bet offer.
- Should a bet contain a combination of offers from different sports/categories/matches and/or offer types, the payout will be limited to the lowest level included in the combination.
- All bet selections are subject to pre-imposed limits set solely at Betr’s discretion.
- For maximum payouts, limits must only be established through limiting the amount of a Sports Wager and cannot be applied to reduce the amount paid to a patron as a result of a winning Sports Wager

3. Incorrectly Posted Events, Odds, Sports Wagers, or Results and Betr’s policy for canceling or voiding Sports Wagers, including for obvious errors

- Betr reserves the right to cancel and void any bets if, in our sole and absolute discretion, there is an Error with the bet or with accepting the bet. This includes bets taken after the

betting closed, where any event was resolved before the bet was taken, where the customer could have an indication of the outcome, where the customer did not have adequate funds in the Gaming Account, or other failures, errors, manipulations, or fraudulent or dishonest activities, including if We have a reasonable suspicion that Your identification or Gaming Account has been compromised.

- Betr will not cancel or void a wager due to an “Obvious Error” without prior approval of the Massachusetts Gaming Commission. Potential obvious errors include: “Error” is a mistake, misprint, misinterpretation, mishearing, misreading, mistranslation, spelling mistake, technical hazard, registration error, transaction error, manifest error, force majeure and/or similar. Examples of errors include, but are not limited to:
 - bets accepted during technical problems that would otherwise not have been accepted;
 - bets placed on events/offers that have already been decided;
 - bets on odds containing incorrect participants;
 - bets placed at odds that are materially different from those available in the general market at the time the bet was placed;
 - bets offered at odds which reflect an incorrect score situation; or else,
 - odds being clearly incorrect given the chance of the event occurring at the time the bet was placed.
- Should Betr void a wager for any of the reasons listed above, Betr’s Customer Service team will attempt to contact you with an explanation of the decision.
- Should an error occur from an incorrect result, and the incorrect result leads to an overpayment of funds or winnings to your Gaming Account, Betr will make an adjustment to the account that may take any money from Your Gaming Account relating to such overpayment at any time. If there are insufficient funds in your Gaming Account to collect the overpayment, Betr may demand that the relevant outstanding amount is paid. Any failure to pay Betr what is owed may result in the suspension or closing of your Gaming Account and legal action.
- If Betr mistakenly accepts a wager on a market that has not been approved by the Massachusetts Gaming Commission, that wager will automatically be voided immediately upon discovery.

4. Methods for the calculation and payment of winning Sports Wager

- Each wager placed on the Betr platform has a “Multiplier” of odds starting from 1.01X with no maximum. A user’s wagered dollar figure will be multiplied times the Multiplier to determine the final payout of winning wagers. For example, if a user places a \$100 wager at a Multiplier of 1.50X, and the wager wins, the wager will profit \$50 and return \$150 to the player. If the Multiplier is 5X, a \$100 winning wager will profit \$400 and return \$500 to the player.

5. Effect of schedule changes including the handling of Sports Wagers with multiple selections, such as parlays, where one or more of these selections is canceled

- When an event is cancelled prior to starting, all related bets will be void and accounts refunded.
- If any game is abandoned due to injury, bad weather, crowd trouble etc. all bets that have already been settled up until the time of abandonment will stand.
- A bet made as a parlay shall remain valid notwithstanding a game or an event which is part of the parlay bet being void.
- Events or competitions which are not held, get postponed and/or rescheduled for a time/date longer than 12 hours from the last scheduled time issued by the governing

body due to bad weather, crowd trouble or similar scenarios will be declared void with the following exceptions where bets will remain valid:

- Events which starting times have not been officially confirmed yet by the governing body at time of bet placement.
- Events which are moved due to scheduling conflicts/tv broadcasts but remain scheduled to be played within the same matchday/game week/round (as applicable) and the change does not change the order of official fixtures for any of the participants in the offer.
- Events which start times are anticipated (brought forward) but remain scheduled to be played within the same matchday/game week/round (as applicable) and, without prejudice to past-posting and similar occurrences the change does not modify the order of official fixtures for any of the participants in the offer.

6. Methods of notifying patrons of odds or proposition changes

- All odds offered are subject to variation. Such fluctuation is determined solely at Betr's discretion. Bets are accepted only at the odds available in the betting grid at the time the bet was accepted by Betr, irrespective of any other claim or previous publication present on the website or any other media detailing otherwise. Any change in odds while placing a wager will result in a notification to the patron within the sports wagering platform.

7. Acceptance of wagers at other than posted terms:

- Wagers will be managed following the site's general Game Rules. Unless stated otherwise in the application at the time of bet placement, all other rules in Betr's House Rules and Game Rules will apply. Any modifying features of the rules relating to a wager will be included on screen at the time of bet placement.

8. Procedures related to pending winning Sports Wagers

- All winning wagers will be settled automatically on the Betr platform with winnings returned to your wagering account.
- Wagers will settle within 24 hours of the events completion unless the results of the wager is disputed or an sports wagering integrity complaint has been filed on the event. If these cases, Betr will contact you to inform you of the reason for the delay in wager settlement.

9. Methods of contacting the Sports Wagering Operator for questions and complaints

- Any claim or dispute arising from any transaction past or present on Betr Sportsbook should be first directed to Betr by contacting our Customer Support Team via all available channels:
 - Support@Betr.app
 - Live Chat functionality
- Betr's Customer Services team will respond to any complaint or dispute received from within a maximum of ten (10) calendar days from the day the complaint is received.
- A patron can contact the MGC directly to file a complaint by accessing <https://massgaming.com/regulations/fairdeal/> and completing the requisite information. Patrons can submit disputes by calling the Commission's Integrity Tip Line at 1 (844) 303-8477 or completing a form (found on <https://massgaming.com/regulations/fairdeal/>) and sending it via email to MGCcomments@massgaming.gov, or mailing it to: Massachusetts Gaming Commission, 101 Federal Street, 12th Floor, Boston, MA, ATTN: Sports Division.

10. Description of prohibited persons

- A prohibited person refers to:

- Any individual under 21 years of age;
- Betr, its directors, officers, owners and employees or any relative living in the same household;
- An individual with proprietary or non-public information held by Betr;
- A professional or athlete, coach, referee, team owner, employee of a Sports Governing Body or its member teams and patron and referee union personnel, seeking to place Sports Wagers on events in the sport in which the individual participates, or in which the athlete the individual represents participate;
- Any individual prohibited from Sports Wagering pursuant to 205 CMR 250.00: Protection of Minors and Underage Youth from Sports Wagering;
- Any individual who is self-excluded from Sports Wagering pursuant to 205 CMR 233.00: Sports Wagering Voluntary Self-exclusion;
- Any individual who is prohibited from or subject to limitations regarding Sports Wagering pursuant to 205 CMR 254.00: Temporary Prohibition from Sports Wagering, and regulations pertaining to play management and limit setting;
- Any individual Wagering while not in the authorized geographic boundaries within the Commonwealth;
- Any individual placing Sports Wagers as agents or proxies for others;
- Any restricted patron Wagering in violation of their restrictions established in 205 CMR 238.32;
- Any individual Wagering in violation of state, local or federal law; or
- Other prohibited Persons as determined by the Commission.

11. Methods of funding a Sports Wager

- Your Betr wagering account can be funded via debit card, PayPal, or online banking transfer. Note: credit cards are not accepted on the Betr Sportsbook.

12. Parlay-Wager-related rules

- Betr reserves the right to limit the number of parlays due to what is known as outcome dependency/related contingencies, and also other factors, solely at its own discretion.
- Parlay wagers have various minimum and maximum wager amount depending on the wagers selected, number of combination, and other risk mitigating factors

Game Rules

Football

General Rules

- Games must start in the same scheduling week of the league (for NFL, the scheduling week is Thursday-Wednesday, local stadium time; for NCAA, the scheduling week is Tuesday-Monday, local stadium time) for bets to have action.
- If a game is halted before the minimum time has been played, and not completed within 48 hours of the scheduled start date, bets will be void, unless the specific market outcome is already determined (unless otherwise stated, i.e., playoff game rule).
- If a game is halted at any time, and replayed in full, all bets will be void.
- If a game venue is changed, and the home team remains designated as such, bets will stand.
- If a game venue is changed, and the home and away team's listings are reversed, bets placed on

the original listing will be void.

- In 2-way markets, push rules apply unless otherwise stated.
- All bets include overtime unless otherwise stated.
- Forfeited games, whether won or lost, will not count as a game played or completed (or any other similar term) for settlement purposes.
- For markets related to instances of scoring (e.g. Next Scoring Play), extra point and 2 point conversions after touchdowns are not considered, unless otherwise stated.

Specific Market Rules

- The entire game must be played for bets to have action unless the result is already determined. Push rules apply.
- **1st Offensive Play from Scrimmage** – Kick-off return and false start do not count as an offensive play.
- **Offensive Score on 1st Drive of the Game** – Field Goals count as an offensive score.
- **Result of Drive Markets** - All result of drive markets start on the first offensive snap of the ball. Any drives which are completed due to the end of the half or game, and do not explicitly result in one of the outcomes listed, will be void. The outcomes are as follows:
 - Interception or Fumble Lost (note, if the defense recovers and then fumbles back to the offense during the same play, a new drive will begin and the previous drive will be settled as a Turnover)
 - Defensive touchdown (except when a blocked punt results in a touchdown)
 - Turnover on downs
 - Offensive Touchdown
 - Field Goal Attempt – Field Goal Attempt is deemed the winner if the kicker kicks the ball. Blocked, scored, missed, or returned field goals will all be settled as a field goal attempt. Botched/fake field goals are not considered a field goal attempt.
 - Punt – Punt is deemed the winner if the punter kicks the ball. All punts returned for a touchdown will be settled as a Punt. Muffed/Blocked punts will be settled as a Punt, and a new drive will begin with the next snap of the ball.
 - Turnover or Turnover on Downs or Safety - A turnover is classified as the defense gaining possession of the ball. The following will all be deemed as a turnover for settlement purposes: Interception, fumble recovery by the defense, defensive team scores a safety, or the offensive team fails to make a first down or score a touchdown on 4th down and gives possession to the opponent.
- **Drive Crosses X Yard Line Markets** – In the event of time expiring, the final spot of the ball, which could either be the forward progress of the ball during a play while time expires, or the line of scrimmage of a play that is not ran due to time expiring, will be considered the final yard line. If the ball is fumbled, settlement is determined on the yard line of fumble. The line of scrimmage must be established past the yard line stated. The yard line crossed markets will result before halftime and when the game ends even if the drive isn't completed. Other markets, however, will not result at halftimes and end of games.
 - If an actionable yard line is crossed but there is a fumble or a penalty on the play, it does not count as crossing the yardline.
- **Next Play Total Yards/Next Play First Down/Next Play Touchdown/Next Play Attempt Type** – Any play which does not occur due to the end of the half or game will be void. A sack will be

settled as a pass attempt in NFL matches and a rush attempt for NCAA matches. Touchdown scored will be settled as First Down "Yes". All bets are void in the instance of an accepted, post-snap, penalty that negates the specified play bet on.

- **Kickoff Touchback** – All bets are void if an onside kick is attempted. All bets are void if a penalty is called on the play.
 - **Extra Point Made** – All bets are void if a 2-point conversion is attempted. All bets are void if a penalty is called on the play.
 - **Field Goal Made** – All bets are void if no field goal is attempted. All bets are void if a penalty is called on the play.
 - **Punt Fair Catch** – "Fair Catch" must be completed for bets to settle as "Yes". All bets are void if a pre or post snap penalty is called on the play and the play negated. If a penalty occurs after the play is completed, all bets stand. All bets are void if there is a fair catch interference penalty.
 - **2 Point Conversion** – All bets are void if an extra point is attempted. All bets are void if a pre or post snap penalty is called on the play and the play negated.
 - All play markets get voided when a penalty is committed on the play.
 - All play markets get voided if a field goal or punt is kicked on the designated play, e.g., a field goal is attempted on 3rd down at the end of a half, 3rd down play markets void.
 - Punt Fair Catch markets will void when a punt is not kicked on the play.
 - Field Goal Make markets will void when a field goal is not attempted on the play.
 - Kickoff Touchback markets will void if an onside kick is attempted.
 - In NCAA Football, if a fair catch is called inside the 25 yard-line on a kickoff and the ball is placed on the 25, the Kickoff Touchback market will result as Yes.
 - Two Point Conversion market will void if an extra point is attempted.
 - Extra Point market will void if a two point conversion is attempted.
- **Yards on First Completion/Reception/Rush** – If the specified player does not record a completion/reception/rush, bets on that market will be void.
 - **Yards on Longest Completion/Reception/Rush** – If the specified player does not record a completion/reception/rush, "under" will be the winner for settlement purposes.
 - "Score this drive" only means offensive score (that pick-6 doesn't count).
 - Aborted snaps count as a rush play.
 - At different points in the game, selections or markets may become unavailable.
 - Drive markets void if the offense does not run a play.

Settlement Rules

- All settlements are based on the statistics and results provided by the official website of the league's governing body, or league's official statistical provider, unless otherwise stated.
- Player markets, or other statistically dependent markets, are settled when the game is final, and when the necessary statistics are readily available on the league's official website, or by the official statistical provider of the league. Any subsequent statistic changes after these markets are settled will not result in a re-settlement.
- In the absence of a statistic/result required for settlement of a specific market from the sources listed above, another reputable statistical source will be used to support bet settlement.

Baseball

General Rules

- Game must start on the scheduled day (local stadium time) for bets to have action.
- Bets on games suspended after they have started will have action as long as the game is resumed within 36 hours of the original start time. If a suspended game is scheduled to be resumed more than 36 hours after the original start time, all bets will be void, unless the wager has been unequivocally determined prior to the game's suspension. This applies unless otherwise stated (i.e., playoff game rule).
- If a game is terminated before becoming official, and is not scheduled to resume from where it was halted, all bets will be void, unless the wager was already determined (e.g., if a game is terminated in 3rd inning, settlement of the 1st inning over/under stands).

MLB Wagers

- **Listed Pitchers Bets** – A wager that specifies the starting pitchers for both teams or either team. The name(s) of the listed pitcher(s) who are relevant for the wager will be included in the market name. If one (or both) of the starting pitchers listed on the wager do not start, the wager is void. Note - any Listed Pitchers wagers will not be available for Cash Out when the game is live.
- **Live Betting** – If the live prop specifies the pitcher, the bet will stand only if the listed pitcher remains on the mound until the determination of the wager.

Specific Market Rules

- All plate appearance and pitch predictions will void when the plate appearance (batter vs. pitcher match-up) does not occur in the listed inning (e.g., the 4th plate appearance of an inning doesn't occur as the first three resulted in outs).
- All plate appearance and pitch predictions will void if the batter or pitcher is substituted out prior to the plate appearance beginning. In either scenario, that prediction will void and a new one will be created with the correct context at the correct time.
- Pitch result predictions will void if an intentional walk is called prior to the pitch being thrown.
- The "plate appearance reach base" prediction will result as "No" if the batter reaches base safely but is tagged out before the play concludes. For example, hitting a single then getting thrown out while trying to advance to second in the same play will result in "No."
- The plate appearance "hit, out or walk" prediction will void on Error, error out, failed fielder's choice or catcher interference.
- The 3-Batter Reach Base prediction will void when an inning ends before the first 3 batters have a plate appearance (e.g., walk-off prior to the 3rd batter appearing).
- Anywhere we refer to "at-bat," we are using the colloquial term for a plate appearance.
- Fielder's choices result as an "out" even if the batter reaches base.
- A dropped 3rd strike counts as a strikeout for the batter but doesn't count as an out if he reaches base safely.
- 'Reach on error' and 'Hit by pitch' voids the "hit, out or walk" market.
- If a pitch results as a hit batter, it is resulted as a "Ball."
- Catcher's interference results as a "Reach on Error."
- Intentional walks void the pitch count and future pitch markets.
- All upcoming or live predictions will void when a prediction cannot be resulted due to a postponement or weather delay and the game does not resume on the day it was originally

scheduled.

- For any pre-live props to have action, the game must go at least 9 innings (8.5 innings if home team is ahead), or 7 innings (6.5 innings if home team is ahead) in a 7-inning game, unless settlement has already been determined from an official, shortened, game.
- **Next Plate Appearance Markets**
 - The official ruling made by Major League Baseball on what constitutes a plate appearance for a given player will be used for settlement purposes when determining whether the plate appearance was recorded in the inning specified in the bet. The plate appearance must be in the specified inning for the listed batter and against the listed pitcher, in each case as stated in the bet, otherwise the bet will be void. If a plate appearance is incomplete at the end of an inning, bets will be void.
 - Live Plate Appearance/Pitch Result/Pitch Count markets will all be void in the instance of an intentional ball/walk.
 - The “No” selection in this market is settled as “any other result” besides a hit, walk, or hit by pitch.
 - Interference, obstruction, or sacrifice bunt/fly will be settled as “No”.
 - A batted ball that is caught in foul territory to record an out will be settled as “In-Play”.
 - For settlement purposes, “Strike” only includes swinging strikes and called strikes.
 - “Reach on Error” includes: on error, failed fielder’s choice, catcher interference, and dropped third strike (where the batter beats the throw to 1st base).
 - All bets on the specific market will be void in the following scenarios: error, failed fielder’s choice, and catcher interference
 - “Yes” will be settled as the winner if the specified player hits a home run or the result of the player’s plate appearance ends with that player being on any base or reaching home plate (including reaching base in scenarios such as an error or fielder’s choice, but excluding reaching via an intentional walk).
 - “No” will be settled as the winner if the specified player does not hit a home run or the result of the player’s plate appearance ends with that player not being on base (including scenarios such as the player recording a hit but being thrown out trying to stretch a single into extra bases).
 - Hit by pitch and pitch out are included in the settlement for “Ball”.
 - “In Play” includes any type of hit (single, double, etc.) in addition to any batted ball which results in an out(s) being recorded.
 - Predict the result of the plate appearance for each of the first three batters due in a half inning. The bet is whether each batter will reach base or not (e.g., “no|yes|no” means that the first and third batter of that half inning will not reach base, and the second batter will reach base).
 - “Yes” will be settled as the winner if the specified player hits a home run, or the result of the player’s plate appearance ends with that player being on any base (excluding reaching via an intentional walk) or reaching home plate.
 - All bets have action regardless of any pinch hitters or pitching changes.
 - General Rules
 - Next Plate Appearance (2 Way)
 - Next Plate Appearance Next Pitch Result
 - Plate Appearance Result Exact (Listed Pitcher)
 - Plate Appearance Result Grouped (Listed Pitcher)
 - Plate Appearance Result Reach Base (Listed Pitcher)
 - Pitch Result (Listed Pitcher)
 - 3-Batter Reach Base

Settlement Rules

- All settlements are based on the statistics and results provided by the official website of the league's governing body, or league's official statistical provider, unless otherwise stated.
- Player markets, or other statistically dependent markets, are settled when the game is final, and when the necessary statistics are readily available on the league's official website, or by the official statistical provider of the league. Any subsequent statistical changes after these markets are settled will not result in a re-settlement.
- In the absence of a statistic/result required for settlement of a specific market from the sources listed above, another reputable statistical source will be used to support bet settlement.

Basketball

General Rules

- The game must start on the scheduled day (local stadium time) for bets to have action.
- If a game is halted at any time, and replayed in full, all bets will be void.
- If a game venue is changed and the home team remains designated as such, bets will stand.
- If a game venue is changed and the home and away team's listings are reversed, bets placed on the original listing will be void.
- In 2-way markets, push rules apply unless otherwise stated.

Specific Market Rules

- An offensive rebound continues a possession. So if a player misses a FG, the team grabs an offensive rebound and scores a two pointer, the result of the possession is a Score/Two Pointer.
- A jump ball in which the defensive team comes up with the possession counts as a turnover.
- Next possession bet is available during timeouts, quarter (or "half" if NCAA basketball) breaks and free throws and suspends when play resumes.

- If a quarter (or “half” if NCAA basketball) ends with a missed shot at the buzzer and no team rebounds that miss, all bet on that possession result will be voided.
- Blocked shots that get rebounded by the defensive team count as a Missed FG.
- Non-shooting fouls (technical, clear path, defensive 3 in the key) that lead to free-throws count as Free Throws.
- Basket interferences count as Turnovers.
- If a player does not play in a quarter (or “half” if NCAA basketball), all bet associated with that player gets voided.

Settlement Rules

- All settlements are based on the statistics and results provided by the official website of the league’s governing body, or league’s official statistical provider, unless otherwise stated.
- Player markets, or other statistically dependent markets, are settled when the game is final and when the necessary statistics are readily available on the league’s official website or by the official statistical provider of the league. Any subsequent statistic changes after these markets are settled will not result in a re-settlement.
- In the absence of a statistic/result required for settlement of a specific market from the sources listed above, another reputable statistical source will be used to support bet settlement.



POINTS BET
131 1st Street
Suite 800
Denver, CO 80202

March 14, 2023

VIA EMAIL

Massachusetts Gaming Commission
Attn: Karen Wells
101 Federal St.
12th Floor
Boston, MA 02110
karen.wells@massgaming.gov

RE: Request for Approval to Withdraw Application

Dear Executive Director Wells,

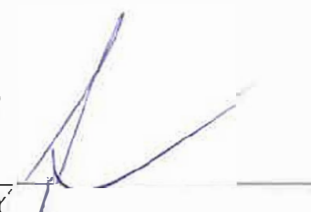
On behalf of PointsBet Massachusetts LLC (“PointsBet”), I would like to express immense gratitude to the Massachusetts Gaming Commission (“MGC”) for the meticulous and thorough approach to launching a sports wagering regulatory structure in the Commonwealth, pursuant to enabling legislation. PointsBet recognizes the immeasurable efforts of the MGC throughout the pendency of the process. It has been our distinct pleasure to work so closely with the MGC and its staff.

Due to business reasons detailed in Exhibit A¹, PointsBet would like to request MGC’s approval to withdraw its business entity disclosure application submitted for consideration as a Category 3 licensee and all related business entity disclosures and individual qualifier applications submitted on its behalf, as outlined in Exhibit B.² On January 19, 2023, the MGC made a finding that PointsBet was preliminarily suitable during public deliberations, as such requiring the submission of this request to obtain the necessary approval of MGC to withdraw its application from further consideration.³

Thank you in advance for your time with this matter. Please let us know if you have any questions. We look forward to hearing from the MGC regarding our request for approval to withdraw the PointsBet Massachusetts LLC application and any related entity and personnel applications submitted as required and outlined in Exhibit B to this letter.

Sincerely,

POINTS BET

By: 
Johnny Aitker
Chief Executive Officer

¹ PointsBet asserts that Exhibit A is exempt from public disclosure pursuant to [Mass. General Laws c. 23N, s. 6\(i\)](#), as it is commercially-sensitive and if disclosed, would put PointsBet at a competitive disadvantage.

² See [205-CMR-213](#).

³ See [205-CMF-215.01\(2\)\(c\)](#).

REDACTED

Exhibit B

Business Entity Disclosures

1. PointsBet Massachusetts LLC
2. PointsBet USA Inc.
3. PointsBet Holding USA Inc.
4. PointsBet holdings Limited

Individual Qualifiers

1. Samuel Swanell – Group CEO
2. John Aitken - CEO
3. Kate Chesney - CFO
4. Jake Williams - COO

New England Horsemen's Benevolent and Protective Association, Inc

A National Organization



P.O. Box 550247 Waltham, MA. 02455 617-744-3603

www.newenglandhbpa.com

President – Anthony Spadea

Executive Director – Paul Umbrello

Directors Owners- Shirley Dullea, Chris Trakas Dan Joyce, Joseph Lewko, Al Tassone

Directors Trainers – Tim Kirby, Kevin McCarthy, Leona McKanas George Saccardo, Matt Clarke

Dear Members of the Massachusetts Gaming Commission:

As Executive Director for the New England Horsemen's Benevolent and Protective Association (HBPA) and the only state recognized representative of the Thoroughbred Racing industry, I was informed that the MGC will hold a hearing on March 30, 2023 to discuss Advanced Deposit Wagering (ADW) and consideration by the Commission of permitting horserace betting via Online Sports Betting Apps.

Without having the benefit of the full details of said hearing at this time, we do have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

As in all matters concerning horseracing, the NEHBPA asks that the MGC consider the best interests of the Horsemen as the MGC is the regulatory authority created in legislation in 2011 to support and promote thoroughbred racing in Massachusetts.

We welcome any input and response by the MGC and look forward to working with you and your professional staff to advance thoroughbred racing in Massachusetts.

Thank you,

Paul Umbrello,
Executive Director
NEHBPA



DLA Piper LLP (US)
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Bruce S. Barnett
bruce.barnett@us.dlapiper.com
T 617.406.6002
F 617.406.6102

March 27, 2023

BY ELECTRONIC MAIL

Executive Director Karen Wells
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110
karen.wells@massgaming.gov

Dear Executive Director Wells:

As you know, this firm represents Sterling Suffolk Racecourse, LLC (“SSR”), which is a racing licensee and the operator of a simulcast facility under Chapters 128A and 128C of the General Laws and Chapter 128 of the Acts of 2022. We understand that, at its meeting on March 30, 2023, the Commission will be considering whether it is permissible to add horse races to the menu of approved events for sports wagering licensees, and I write to provide SSR’s comments on that question. For the reasons set forth below, SSR believes that any wagers on horse races accepted by a sports wagering licensee must be placed in conformance with Chapters 128A and 128C, which require the sports wagering licensee to be an account wagering provider of a racing licensee.

Parimutuel Wagering on Horse Races in Massachusetts

Wagering on horse races in the Commonwealth is governed by Chapters 128A and 128C of the General Laws, as they have been amended and supplemented by various sessions laws.¹ Originally, Chapter 128A restricted horse race wagering to the racing licensees’ own live races. *See, e.g.*, MGL Ch. 128A, § 5. In 1992, the Legislature adopted Chapter 128C and expanded acceptable forms of wagering by racing licensees to include simulcasting, which involves racing licensees taking bets on races occurring at other tracks in Massachusetts and around the country. *See generally* MGL Ch. 128C. In 2001, the Legislature added account wagering, also known as advance deposit wagering or ADW, through which wagers can be accepted by phone or other electronic communications by racing licensees or by a service provider operating through an agreement with a racing licensee. *See* MGL Ch. 128A, § 5C. Most recently, over the past 13 years, the Legislature has authorized the former greyhound tracks and SSR to conduct simulcast and ADW operations without a requirement to maintain a racetrack or to host live races.

¹ For the time being, Chapters 128A and 128C also authorize simulcast wagering on greyhound races conducted outside of Massachusetts. In light of the ban on such wagers that will come into effect later this year, *see* Chapters 128 & 173 of the Acts of 2022, these comments focus on wagering on horse races.

While the legislature has expanded the types and methods of wagering on horse races, it has held constant the requirement that all horse race wagers be accepted by either a racing licensee or an account wagering provider acting pursuant to an agreement with a racing licensee and in accordance with Chapter 128A, Section 5C. Those are the only persons authorized to accept wagers, and the statute prohibits any person from “holding or conducting a gambling pool or managing any other type of wagering or betting on the results of any horse or greyhound race” except as permitted by the racing statutes. MGL Ch. 128A, § 13. Similarly, the account wagering statute provides that wagers on horse races by telephone or other electronic communications may be placed only by persons with an account with a racing licensee or one of its ADW service providers. MGL Ch. 128A, § 5C.

Other provisions of the General Laws, including various sections of Chapter 271, establish criminal penalties for unauthorized wagers. For example, Chapter 271, Section 16A forbids providing facilities or services for “the illegal registration of bets or the illegal buying or selling of pools upon the result of a trial or contest of skill, speed or endurance of man, beast, bird or machine.” It bears noting that the Legislature created an exception to this statute for gaming under Chapter 23K but not for sports wagering.

The Sports Wagering Act

The adoption of the Sports Wagering Act, Chapter 173 of the Acts of 2022 (the “Act”), did not displace Chapters 128A and 128C as the statutes governing wagering on horse races. In light of the carefully crafted, minutely detailed statutory prescriptions for the handling of wagers on horse races in those statutes, and the annual attention that the Legislature has given to the racing statutes over at least the past decade, it is unfathomable that it would include horse race wagering as sports wagering under Chapter 23N without saying so expressly and providing direction as to how such wagering should be regulated. Chapters 128A and 128C, as supplemented and amended by subsequent session laws, are very specific about the manner in which horse race wagering is to be conducted, including specifying limits on the amount a racing licensee can take out from the parimutuel pool for various types of wagers, a racing-specific tax rate, requirements for the distribution of monies collected from wagers, and the requirement that simulcast wagering be done in accordance with the Interstate Horseracing Act. *See, e.g.*, Ch. 128A, § 5; Ch. 128C, §§ 2, 4, 5. The Sports Wagering Act provides no such guidance with respect to parimutuel wagering on horse races. There is no basis on which to conclude that the Legislature, while preserving and extending the existing regulatory structure for racing licensees under the racing statutes, intended to simultaneously and *sub silencio* permit horse race wagering by sports wagering licensees operating under Chapter 23N without providing direction on how those wagers are to be regulated and whether they are subject to Chapters 128A and 128C.

That conclusion is confirmed by examining the Sports Wagering Act itself. It does not include horse races in the definition of “sports event” in Chapter 23N (although it does specifically include “motor races”) and does not include parimutuel wagering in the definition of “sports wagering” or in that definition’s list of examples of sports wagers. *See* Ch. 23N, § 3. The omissions are especially significant because the Sports Wagering Act has numerous references to the racing statutes, the racing licensees, and horse race wagering, demonstrating legislative awareness of parimutuel wagering at the time. For example, the Legislature created an entire category of sports wagering license—Category 2—for existing racing licensees

(including SSR and Raynham Park) and any future racing licensees. Moreover, the eligibility of those existing racing licensees for a Category 2 license is expressly conditioned on their having conducted simulcast wagering as of December 31, 2020.

Sections of the Sports Wagering Act that are not part of Chapter 23N confirm that the Legislature not only had parimutuel wagering in mind when enacting the law, but also intended parimutuel wagering to continue to be governed by Chapters 128A and 128C. The very first section of the Act re-enacted the statutory definition of “illegal gaming” and, among the listed exceptions to the general definition, placed “parimutuel wagering on horse races under chapters 128A and 128C” in parallel with “sports wagering conducted under chapter 23N.” St. 2022, Ch. 173, § 1. In addition, the Legislature banned simulcast wagering on greyhounds in the Commonwealth by inserting a new section into Chapter 128C which, by its terms, applies to racing meeting licensees. St. 2022, Ch. 173, § 6 (inserting, effective August 2023, new Section 9 into Chapter 128C). It cannot be that the Legislature intended to ban greyhound simulcast wagering by racing licensees, including the former greyhound tracks, while simultaneously and silently authorizing parimutuel wagering by sports wagering licensees under Chapter 23N with no restriction on their ability to simulcast greyhound races.

In addition, on the same day it enacted the Sports Wagering Act, the Legislature once again extended the racing statutes and the authority of the existing racing licensees to continue simulcasting, which had been set to sunset. *See* St. 2022, Ch. 128.

That Chapter 23N does not include parimutuel wagering on horse races does not mean that sport wagering licensees cannot offer that product to their customers. Rather, it requires that they do so in conformance with the racing statutes. As noted, Chapter 128A, Section 5A provides a means for a nonracing licensee to accept wagers on horse races as an ADW service provider with an agreement with a racing licensee. Indeed, many Massachusetts sports wagering licensees or their affiliates have already taken this path. To date, FanDuel Racing, BetMGM, Caesars Racebook, DK Horse (a DraftKings service), and Hollywood Racing (a service of Penn National companies) are among the authorized ADW providers in Massachusetts.

SSR appreciates the opportunity to provide comments on this issue. Please do not hesitate to contact me if you have any questions.

Sincerely,



Bruce S. Barnett

cc: Chair Cathy Judd Stein
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Jordan Maynard
General Counsel Todd Grossman
Director of Racing Alex Lightbown
Director of Sports Wagering Bruce Band
Mr. Michael Buckley, COO, Sterling Suffolk Racecourse, LLC



Todd Grossman, Esq.
General Counsel
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston MA 02110

March 28, 2023

Re: Public Meeting 446, Agenda Item 4(b)

Dear Counselor Grossman:

I write on behalf of PENN Entertainment, Inc, parent company of Plainridge Park Casino, which, as the Commission is aware, is the only live horse racing operator in the Commonwealth (with plans to open its 110-day live meet on April 10). PENN is also the largest racing operator in the United States, with eleven facilities in eight jurisdictions. PENN conducts over 1,300 live events annually, and in 2022 processed over \$1 billion in live and simulcast racing wagers. PENN is also the parent company of Hollywood Races, an account deposit wagering company licensed by the Commission to accept pari-mutuel wagers, as well as Penn Sports Interactive, licensed by the Commission to accept online sports wagers.

We note that Item 4(b) on the agenda for Public Meeting 446 scheduled for March 30, 2023 is marked up as “Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c.23N.” We have been operating under the assumption that 205 CMR 247.01(2)(d), as promulgated by the Commission, would not permit wagering on horse racing because that section states: “An Operator shall not offer sports wagering on...any horse or greyhound races.”

We suggest that this is an appropriate prohibition, particularly given the elaborate statutory scheme governing wagering on racing in, for example, G.L. c.128A(5) and G.L. c.128C, which contemplates that the pari-mutuel system is the legally authorized method of wagering on racing in the Commonwealth.

We respectfully suggest that, if the Commission were inclined to authorize wagering on racing in the sports wagering catalog, such a decision should only be made after a fulsome study and review process with the opportunity for appropriate stakeholder comment (and, potentially, legislation). A system such as “fixed odds” wagering, which has been in place in jurisdictions such as Great Britain, parts of Europe, and Australia, has thus far had limited traction in the United States with only New Jersey offering it (pursuant to statutory and regulatory authorization) and with Colorado having authorized it but not yet launched.

Importantly, as part of any such discussion in the Commonwealth, the Commission should consider the interests of racetracks, simulcast locations, and horsemen, who have certain rights and revenue sharing opportunities relating to live and simulcast racing. In addition, the Interstate Horse Racing Act of 1978 creates a framework for the current pari-mutuel simulcast system in which over 90% of today’s horse racing handle flows, protecting the interests of horsemen, racetracks and states when it comes to consent for use of racing content. Those interests should be carefully considered by the Commission as part of any study of the issue, as should a review of the experience in New Jersey and Colorado to consider how such a wagering product can be designed to be supportive of the current racing industry in the Commonwealth while also protecting the interests of all stakeholders.

To conclude, we respectfully submit that introducing a product such as fixed odds wagering on horse racing through a sportsbook catalog would be a complex and significant development, and PENN suggests that the Commission undertake a fulsome study of the issue before taking any action, should the Commission have an interest in adding such wagers to the catalog.

We would be happy to answer any questions the Commission may have on this topic and, if helpful, would be available to participate in any Commission discussion on this issue, either on March 30 or in the future at the Commission’s convenience.

Thank you for your consideration.

Respectfully,

Chris McErlean
Vice President - Racing

Cc: Dr. Alexandra Lightbown



KATHLEEN A. REAGAN, ESQ.
kreagan@flynnwirkus.com
admitted MA,

March 29, 2023

Via Email: todd.grossman@massgaming.gov

Todd Grossman, General Counsel
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

RE: Meeting Agenda Item Concerning Sports Wagering and Horse Racing

Dear Mr. Grossman:

This letter is written on behalf of the New England Horseman's Association, Inc. and concerns tomorrow's agenda item for a meeting of the Massachusetts Gaming Commission and regards sports wagering under the terms of M.G.L. Chapter 23N Section 4. My initial review is that the sports wagering law passed does not in fact disturb the Interstate Horseracing Act, 15 U.S.C. Section 57, and to the extent that entities wish to offer wagering on horseracing, that the agreement of the horseman's associations, in this case my client's agreement, would need to be obtained first. Given that this item very recently appeared as an issue, I would request that this agenda item be moved back for another thirty days, so that a more formal response be provided to your office. Failing that, this letter would serve as the objection to the Massachusetts Gaming Commission having the authority under the Interstate Horseracing Act to pass regulations concerning sports wagering and horse racing absent the agreement of my client.

Sincerely,

/s/ Kathleen A. Reagan

Kathleen A. Reagan, Esq.

KAR/peg

cc: Robert McHugh, President, HHANE

BUFFALO

BOSTON

NEW BEDFORD

DIRECT ALL MAIL TO:
350 Granite Street
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Braintree, MA 02184
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F: (617) 773-5510
www.flynnwirkus.com

From: kay u <kclu0620@gmail.com>

Sent: Tuesday, March 28, 2023 12:03 PM

To: Grossman, Todd <todd.grossman@massgaming.gov>; Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>; MGCcomments <MGCcomments@massgaming.gov>

Subject: Sports Betting

Dear Members of the Massachusetts Gaming Commission:.

As a horse owner I have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a NO VOTE pertaining to

Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N

Thank you for your time.

Karen Umbrello

From: ernie corrigan <ernie.corrigan@gmail.com>

Sent: Tuesday, March 28, 2023 12:15 PM

To: Grossman, Todd <todd.grossman@massgaming.gov>; Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>; MGCcomments <MGCcomments@massgaming.gov>

Subject: Sports Betting

Dear Members of the Massachusetts Gaming Commission:.

As an avid fan of Thoroughbred racing, I am concerned about the prospect of allowing horse race betting via mobile licensees. I do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act. It also conflicts with the MGC mission to support and promote thoroughbred racing.

I request a NO VOTE pertaining to

Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N

Ernie Corrigan

617-875-1229 (cell)

From: Gregg Rose <irishgbr@aol.com>

Sent: Tuesday, March 28, 2023 1:05 PM

To: Grossman, Todd <todd.grossman@massgaming.gov>; Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>; MGCcomments <MGCcomments@massgaming.gov>

Subject: Wagering on horse racing

Dear members of the Massachusetts Gaming Commission:

As a horse owner & breeder I have concerns around the prospect of allowing horse race betting via mobile licenses. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horse race betting is covered by the racing statutes which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile license to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the interstate Horse Racing Act. I request a NO VOTE pertaining to Determination as to whether wagering on Horse Racing may be included in the Sports wagering catalog Approves by the Commission under G.L.c 23N.

Thank you.

Gregg Rose

From: Basil Pallone <basilgpallone@aol.com>

Sent: Tuesday, March 28, 2023 2:07 PM

To: Grossman, Todd <todd.grossman@massgaming.gov>; Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>; MGCcomments <MGCcomments@massgaming.gov>

Subject: Horse Racing - Sports Wagering Catalog

Dear Members of the Massachusetts Gaming Commission (MGC):

As a horse owner, I have concerns around the prospect of allowing horse race betting via mobile licensees. I do not believe that horse racing was intended to be a permissible “sporting event” under the applicable statutory and regulatory structure. Horse race betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. I urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which the Massachusetts horse racing industry is protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a **NO VOTE** pertaining to Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N.

Respectfully,

Basil G. Pallone
Sudbury, Massachusetts

From: ARLENE BROWN <arlbrown@comcast.net>

Sent: Tuesday, March 28, 2023 2:23 PM

To: Grossman, Todd <todd.grossman@massgaming.gov>; Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>; MGCcomments <MGCcomments@massgaming.gov>

Subject: mobile licenses for horse racing

Dear Members of the Massachusetts Gaming Commission:.

As a horse (owner, trainer, breeder) I have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a NO VOTE pertaining to

Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N

Arlene B Brown

From: Dan Joyce <dan@joycecontract.com>
Sent: Tuesday, March 28, 2023 4:29 PM
To: Grossman, Todd <todd.grossman@massgaming.gov>
Subject: sports betting

Dear Members of the Massachusetts Gaming Commission:.

As a horse (owner, trainer, breeder) I have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a NO VOTE pertaining to

Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N

Thank you

Dan Joyce
President
Joyce Contract Interiors, Inc. | *Workspace that Works!*
319 Littleton Rd Suite 304
Westford, MA 01886
Tel: 978-251-2226 Ext 22
Cell: 781-526-8524
Fax: 978-251-0550
www.joycecontract.com
BALANCE

From: Donna Pereira <donnapereira212@aol.com>

Sent: Tuesday, March 28, 2023 4:38 PM

To: Grossman, Todd <todd.grossman@massgaming.gov>; Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>; MGCcomments <MGCcomments@massgaming.gov>

Subject: Mobile licenses for horse racing

As a horse (owner, trainer, breeder) I have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a NO VOTE pertaining to this subject

Thank you,

Donna L Pereira
Chairman, MTBA

From: Leona Mckanas <mckanasl@yahoo.com>
Sent: Tuesday, March 28, 2023 3:30 PM
To: Grossman, Todd <todd.grossman@massgaming.gov>
Subject:

Dear Members of the Massachusetts Gaming Commission:.

As a horse (owner, trainer, breeder) I have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a NO VOTE pertaining to

Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N

From: dhcramer63@gmail.com <dhcramer63@gmail.com>

Sent: Tuesday, March 28, 2023 9:17 PM

To: Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>

Subject: Sports Betting

Dear Ms. Lightbown,

As a horse owner and breeder, I have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible “sporting event” under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a NO VOTE pertaining to

Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N

Thank you for your consideration,

David Cramer
617 909-1628

From: Derek DePetrillo <ddepetrillo@hotmail.com>
Sent: Wednesday, March 29, 2023 10:11 AM
To: Lightbown, Alexandra <alexandra.lightbown@massgaming.gov>; Grossman, Todd <todd.grossman@massgaming.gov>; MGCcomments <MGCcomments@massgaming.gov>
Subject: Sports betting

Hello,

As a horse (owner, trainer, breeder) I have concerns around the prospect of allowing horse race betting via mobile licensees. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. Horserace betting is covered by the racing statutes, which provide for mobile and online wagering through ADW providers. We urge the MGC to not permit a mobile licensee to offer betting on horse racing unless said provider is also an ADW vendor. To allow otherwise would jeopardize revenue to which we are protected pursuant to Chapter 128C and the Interstate Horse Racing Act.

I request a NO VOTE pertaining to

Determination as to Whether Wagering on Horse Racing may be Included in the Sports Wagering Catalog Approved by the Commission under G.L. c. 23N

Best regards,

Derek DePetrillo

From: ALBERT TASSONE <altass@comcast.net>

Sent: Tuesday, March 28, 2023 8:39 PM

To: MGCcomments <MGCcomments@massgaming.gov>

Subject: Sport betting

I dont think that horse race betting should be included in the mobile betting.
I hope you vote no. This would take funds from all the horsemen who are no
Longer training horses. This would
decrease the amount of time we would be able to take care of them which they
Put in many years and do deserve.
So once again do the right thing and vote NO.

From: Armand Janjigian <ajanjigian@hotmail.com>
Sent: Wednesday, March 29, 2023 2:13 PM
To: Grossman, Todd <todd.grossman@massgaming.gov>
Subject:

Dear Members of the Mass. Gaming Commission,

My wife and I have been breeding and racing here in Massachusetts for about fifty years and have concerns about the prospect of allowing horse race betting via mobile licenses. We do not believe that horse racing was intended to be a permissible "sporting event" under the applicable statutory and regulatory structure. I request a NO VOTE as to whether Wagering on Horse Racing may be included in the Sports Wagering Catalog Approved by the Commission.

Armand P.P. Janjigian & (wife) Robin Kalaidjian
Black Rushin' Farm



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: March 30, 2023

RE: FanDuel Request for Approval of direct links within FanDuel Sportsbook to FanDuel Racing (ADW)

Dear Commissioners:

FanDuel Vice President for Product and New Market Compliance Cory Fox has submitted a request to enable access points to FanDuel Racing within the FanDuel Sportsbook.

As you are aware, FanDuel Racing has been a Massachusetts Gaming Commission (MGC) approved advance deposit wagering (account wagering) vendor for Suffolk Downs for many years. Now FanDuel is also licensed by the MGC as an online sports wagering operator, FanDuel Sportsbook.

A document has been provided to illustrate how the access points to FanDuel Racing would appear within the FanDuel Sportsbook platform. The following are a few key points:

- The advanced deposit wagering system for horse racing will remain completely separate from the sports wagering system.
- Standalone FanDuel Racing access will still be available for online and mobile use.
- Once a user is logged-in to the FanDuel Sportsbook, they will be able to access FanDuel Racing without another log-in.
- When moving from FanDuel Sportsbook to FanDuel Racing and back, a transfer screen will notify the user that they are moving to a separate product operated by a separate license holder.



Massachusetts Gaming Commission

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

- Users who have not used FanDuel Racing before will be prompted to agree to the advanced deposit wagering terms and conditions prior to being able to use FanDuel Racing.

According to FanDuel, eleven states have this system in place. It has introduced new users to advance deposit wagering. As the Commission learned during the ramp-up to sports wagering, many people in Massachusetts were not aware that we already had on-line wagering on horseracing.

As the Commission is aware, several other advance deposit wagering vendors are approved in Massachusetts, many with ties to the newly approved sportsbooks. For instance, DK Horse is an advance deposit wagering vendor and DraftKings Sportsbook is licensed. If the Commission approves the request of FanDuel, they may choose to discuss how they would like to address similar requests that might come in.



Massachusetts Gaming Commission

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



Cory Fox
cory.fox@fanduel.com

March 23, 2023

Via Email to Alexandra.Lightbown@massgaming.gov
Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: Request for Commission Approval to Enable Access Points to the FanDuel Racing Experience Within FanDuel Sportsbook

Dear Director Lightbown:

I write on behalf of FanDuel Group Inc. (“FanDuel”) to formally request that the Massachusetts Gaming Commission (the “Commission”) approve FanDuel’s request to enable access points to the FanDuel Racing experience within FanDuel Sportsbook. As you may already know, FanDuel owns and operates Betfair Interactive US LLC and ODS Technologies, L.P., both of which are the licensed entities operating FanDuel Sportsbook and FanDuel Racing, respectively, in the Commonwealth. Accordingly, FanDuel is licensed and regulated by the Commission as both an online sports wagering operator and advanced deposit wagering platform.

As previewed for the Commission, FanDuel is seeking to enable access points to the FanDuel Racing experience within the FanDuel Sportsbook platform, which will facilitate our ability to introduce our existing sportsbook users in Massachusetts to a new product that they may not have previously been familiar with. As detailed in the enclosed “Product Journeys – FDR into SBK” document (“Exhibit A”), the experience will enable users to seamlessly access the FanDuel Racing platform via various entry points within the FanDuel Sportsbook platform in a logged-in state. Upon accessing these entry points, as well as when navigating back to FanDuel Sportsbook from FanDuel Racing, users will be presented with a transfer screen notifying them that they are switching to a separate product operated by a separate license holder. Additionally, users who have not previously used FanDuel Racing before will be prompted to agree to the advance deposit wagering platform terms and conditions prior to being able to use FanDuel Racing.

The experience is currently available in eleven states to date, with several additional states on the horizon. This experience has been impactful in introducing new users to advance deposit wagering



who would not otherwise be likely to participate or know it is available in other jurisdictions, and we would expect a similar experience in the Commonwealth. To be clear, activation of this experience will not change anything from an online sports wagering perspective, as the advanced deposit wagering system responsible for wager placement for horse racing is and will remain entirely separate from our sports wagering systems. Likewise, the standalone FanDuel Racing experience will continue to be available both online and via mobile application.

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We appreciate your time and consideration of request and look forward to answering any questions you may have.

Sincerely,

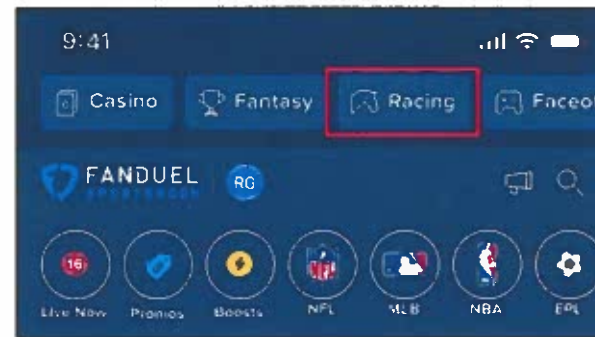
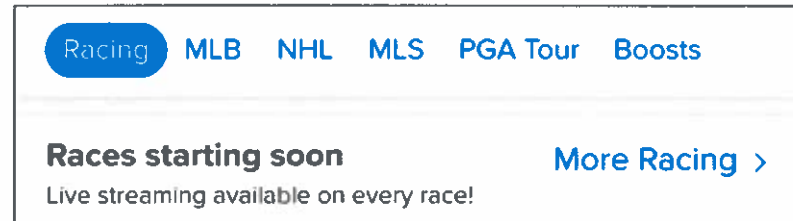
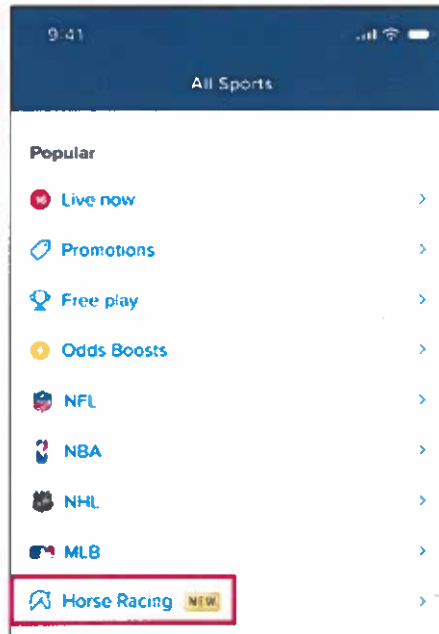
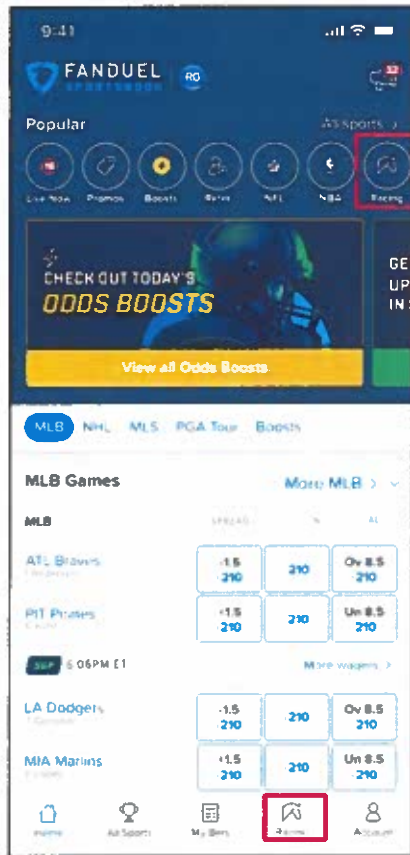
A handwritten signature in blue ink, appearing to read 'Cory Fox', written over a light blue horizontal line.

Cory Fox
Vice President for Product and New Market Compliance

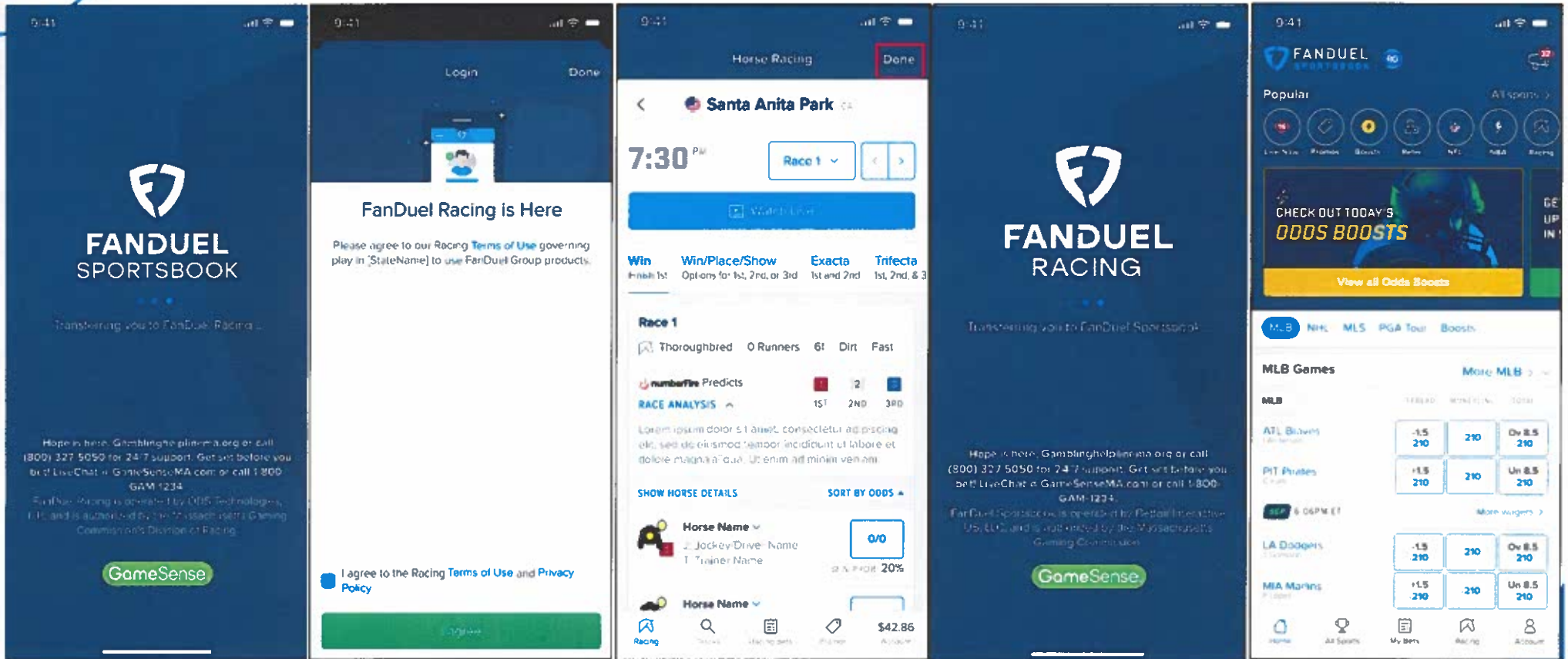
cc: Bruce Band, Sports Wagering Division Director (Bruce.Band@massgaming.gov)

Exhibit A

Product Journeys – SBK Cross Sell Points



1st Time on Racing – Has a Verified SBK Account



FANDUELGROUP

PRIVATE AND CONFIDENTIAL



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

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

CC: Karen Wells, Executive Director

DATE: March 30, 2023

RE: Proposed FY2024 Gaming Research Agenda

Background:

The Expanded Gaming Act enshrines the role of research in understanding the social and economic effects and mitigating the negative consequences of casino gambling in Massachusetts. To this end, with the advice of the Gaming Policy Advisory Committee, the Commission is charged with carrying out an annual research agenda to comprehensively assess the impacts of casino gambling in Massachusetts. Specifically, [M.G.L. Chapter 23K §71](#) directs the research agenda to examine the social and economic effects of expanded gambling and to obtain scientific information relative to the neuroscience, psychology, sociology, epidemiology, and etiology of gambling. [M.G.L. Chapter 23N, §23](#) extends the scope of the research agenda to include an understanding of the effects of sports wagering in the commonwealth.

To support the successful implementation of these statutory mandates, the Commission adopted a strategic research plan that outlines research in seven key focus areas, including:

Economic Impact Research

The Economic Impact component of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study, conducted by a team from the UMass Donahue Institute, analyzes the fiscal and economic effects of expanded gaming across the Commonwealth. The economic research is intended to provide 1) neutral information of decision-making, 2) early warning signs of changes connected with casino gambling, and 3) help reducing gambling-related harm. To explore more about the economic impact research including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=economic-impact>

Social Impact Research

The Social Impact component of the Social and Economic Impacts of Gambling in Massachusetts

(SEIGMA) study, conducted by a team from UMass Amherst, analyzes the social and health effects of expanded gaming across the Commonwealth. To explore more about the social impact research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=social-impact-research>

Community-Engaged Research

The objective of community-engaged research is to understand and address the impact of gambling in Massachusetts communities. The specific research topic or question is developed by the community through a community-driven process. To explore more about the community-engaged research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=community-engaged-research>

Public Safety Research

Public safety research examines gaming impacts on public safety, including crime, calls-for-service, collision, and driving under the influence data. This element of the Commission's research agenda has produced a baseline for each casino host and surrounding communities. Annual follow-up studies measure change in activity and highlight possible connections to the casino. To explore more about the public safety research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=public-safety>

Responsible Gaming Program Evaluation

The Commission is committed to offering effective, evidence-based responsible gaming programs and initiatives. Currently, these initiatives include statewide Voluntary Self Exclusion, PlayMyWay Play Management System, and the GameSense program. The introduction of mobile sports wagering will usher in additional responsible gaming tools, and measures. Ongoing and independent evaluation informs the overall responsible gaming strategy and future direction of these programs. To explore more about the evaluation research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=responsible-gaming-program-evaluations>

Massachusetts Gaming Impact Cohort

The Massachusetts Gambling Impact Cohort (MAGIC), was the first major longitudinal cohort study of gambling behavior in the United States. This study provided insights into demographic groups particularly at risk of experiencing gambling-related harm and provides information on how gambling and problem gambling develop, progress and remit, and will identify demographic groups particularly at risk of experiencing gambling-related harm. To explore more about the Massachusetts Gaming Impact Cohort, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=massachusetts-gambling-impact-cohort>

Data Sharing

To improve transparency and build upon the existing research body of research, the Commission has a robust research library and data sharing portal. The Massachusetts Open Data Exchange (MODE) invites researchers of all disciplines to use available gaming-related data to advance the empirical evidence and knowledge base about casinos' social and economic effects on individuals and communities. To explore more about the Massachusetts Open Data Exchange: <https://massgaming.com/about/research-agenda/>

Proposed FY24 Gaming Research Agenda

The proposed FY24 Gaming Research Agenda is estimated to be \$1,865,000. This is roughly 30% increase from the adopted FY23 budget of \$1,438,000. The increase includes a significant expansion of the annual research agenda to encompass sports wagering as outlined in M.G.L. c. 23N, § 20 and 23, as well as the 2022 Act Regulating Sports Wagering, § 25. If approved, the additional funding would support the following projects:

- Study to examine effects of expansion of gaming in Massachusetts on human trafficking.
- Studies related to sports wagering:
 - An evaluation of the effectiveness of select sports wagering responsible gaming tools.
 - A study on the impact of iGaming on public health, with particular focus on comparison of participants with participants in other forms of gaming, comorbidity with problem gambling, and impacts on youth under the age of 25.
 - A prospective study on the feasibility, and potential impact, of allowing retail locations in the commonwealth to operate sports wagering kiosks.
 - Study on the participation by minority business enterprises, women business enterprises, and veteran business enterprises in the sports wagering industry in the Commonwealth.
 - Study on different existing marketing affiliate payment structures and impact on players.

Below, the proposed FY24 research agenda is shared with you in the following table and includes 1) general description of each project, 2) specific deliverables/activities, 3) a reference to the section of M.G.L. c. 23K or the 2022 Massachusetts Sports Wagering Act, and significance.

Proposed FY2024 Gaming Research Agenda	
Social and Economic Research	
The Expanded Gaming Act (M.G.L. c. 23K § 71) required the MGC to engage research to understand the social and economic effects of casino gambling in Massachusetts. Since 2013 the MGC has contracted the University of Massachusetts Amherst, School of Public Health and Health Sciences to carry out this part of the research agenda.	
Task/deliverable	Statutory and Practical Significance
2024 Integrated Social and Economic Impacts Report	Relates to: M.G.L. c. 23K, § 71 (1) and §71 (2)(iii)(iv)(vii) An integrated report looking at the overall social and economic impacts since Plainridge Park Casino opened in 2015. This report will include a section updating work conducted in 2014 to select communities in the Northeast matched to the MA casino host communities for purposes of counterfactual analysis of the economic impacts of casinos in MA, as well as a section on operations and economic impacts.
Task/deliverable	Statutory and Practical Significance
Online Panel Survey	Relates to: M.G.L. c. 23K, §71 (2)(iii), §71 (3)(ii)

(OPS) 2023 Report	M.G.L. c. 23N, § 23 This report will assess changes in gambling participation from 2022 to 2023, as well as the prevalence of problem gambling. A template for series of brief reports tracking participation and prevalence will also be produced.
Task/deliverable	Statutory and Practical Significance
Out of state visitorship to MA Casinos Report	Relates to: M.G.L. c. 23K, § 71 (1) and §71 (2)(iv) Using a new anonymized dataset (Airsage), this report will use cellphone data to track out of state visitorship to MA casinos. This will provide a comparison to a study by researcher Clyde Barrow about this issue before casinos opened in MA, as well as impacts on the travel and tourism industry.
Task/deliverable	Statutory and Practical Significance
Administer OPS questions	Relates to: M.G.L. c. 23K, § 71 (1) and §71 (2)(iii) M.G.L. c. 23N, § 23 The OPS will be fielded in March 2024 This data will continue to inform trends in gaming and problem gambling, and particularly following the launch of sports wagering.
Task/deliverable	Statutory and Practical Significance
Ad hoc economic report	May Relate to: M.G.L. c. 23K, §71 (2)(iv); M.G.L. c. 23N, § 23 An additional report on the economic impacts of expanded gaming, with topic to be finalized by September 2023.

Public Safety Research	
The MGC is examining changes in crime, calls for service, and collisions following the opening of casinos in Massachusetts. The intention is to demonstrate what changes in crime, disorder, and other public safety harms can be attributed directly or indirectly to the introduction of a casino and what strategies local communities need to implement to mitigate the harm.	
Task/deliverable	Statutory and Practical Significance
Assess the influence of gambling on public safety for Plainville and five surrounding communities . Produce a year-8 report. Provide crime analyst technical assistance as needed.	Relates to: M.G.L. c. § 71 (2)(ii) M.G.L. c. 23N, § 23 <ul style="list-style-type: none"> • Provides ongoing monitoring system of crime, calls for service, and traffic. • Allows for early detection and response to casino related problems that may arise. • Provides an opportunity for greater collaboration with local police chiefs and crime analysts. • This report will explore any changes in public safety which may be related to opening of the PPC sportsbook.
Task/deliverable	Relates to: M.G.L. c. § 71 (2)(ii)

Assess the influence of expansion of gaming on human trafficking in Massachusetts.	<ul style="list-style-type: none"> • Provides insight into effects of expansion of gaming in Massachusetts on a particular type of crime • Allows for detection and response to problems that may arise.
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Community-Engaged Research	
Task/deliverable	Statutory and Practical Significance
Support an estimated two new community driven research projects	Relates to: M.G.L. c. 23K, § 71 (3)(ii) M.G.L. c. 23N, § 23
	The objective of community-engaged research is to more deeply understand and address the impact of casino gambling in Massachusetts's communities. The specific research topic or question is developed by the community through a community-participatory process.
Task/deliverable	Statutory and Practical Significance
Support an estimated two new community-driven research projects through the Community Mitigation Fund	Relates to: M.G.L. c. 23K, § 71 (3)(ii) M.G.L. c. 23K, § 61
	The Commission seeks to study and mitigate gambling related harms through a new pilot program with the Community Mitigation Fund, which will provide funding for a limited number of community-engaged research projects. The funding for this grant is for two levels of assistance. Type 1 is for the development or planning of a study or project and Type 2 is for the implementation of a project.
Data Sharing	
Task/deliverable	Practical significance
Maintain existing datasets in the MODE repository and add additional datasets as they become available, including player card data as required.	Relates to: M.G.L. c. 23K, § 71 (2); Chapter 194, Section 97 The purpose of MODE is to provide access to data generated by research projects funded and overseen by the MGC. Datasets from existing and ongoing research projects and player card data are publicly available with certain parameters.
Develop plan to increase capacity for analysis of MODE data through fellowships, internal resources, and/or partnerships with other agencies	

Responsible Gaming Evaluation	
The MGC is committed to offering effective, evidence-based responsible gaming programs and initiatives. Ongoing and independent evaluation informs the overall responsible gaming strategy and future direction of these programs.	
Task/deliverable	Statutory and Practical significance M.G.L. c. 23K, § 71 (3); M.G.L. c. 23N, § 23
Evaluation of sports wagering Responsible Gaming tools	<p>Option 1: This study will evaluate outcomes related to implementation of an initiative that provides resources to patrons who enroll in temporary prohibition from sports wagering.</p> <p>Option 2: Evaluation of other sports wagering/responsible gaming tools</p>
GameSense Evaluation	Through a licensing agreement with the British Columbia Lottery Corporation and in cooperation with the National Council on Problem Gambling, the MGC will commence an evaluation to assure alignment with overall program goals.

Sports Wagering Research	
<p>The 2022 Massachusetts Sports Wagering Act, §23 extends the scope of the research agenda to understand the social and economic effects of sports wagering in the commonwealth and to obtain scientific information relative to the neuroscience, psychology, sociology, epidemiology and etiology of sports wagering. The sports wagering research agenda shall also include, but not be limited to: (i) an assessment of whether problem sports wagering is comorbid with problem gambling; (ii) an assessment as to whether the individuals participating in sports wagering are different than those who participate in other forms of gaming or gambling; (iii) an assessment of the impact of sports wagering on youth under the age of 25; (iv) an assessment of the impacts of sports wagering on college athletics and professional sports; and (v) the costs of implementing this chapter.</p>	
Task/deliverable	Statutory and Practical Significance
iGaming Study	<p>Relates to: M.G.L. c. 23N, § 23</p> <p>A study on the impact of iGaming on public health, with particular focus on comparison of participants with participants in other forms of gaming, comorbidity with problem gambling, and impacts on youth under the age of 25.</p>
Task/deliverable	Statutory and Practical Significance
Kiosk Study	<p>Relates to: M.G.L. c. 23N, § 20</p> <p>A prospective study on the feasibility, and potential impact, of allowing retail locations in the commonwealth to operate sports wagering kiosks.</p>
Task/deliverable	Statutory and Practical Significance
Study on participation of	Relates to: The 2022 Act Regulating Sports Wagering, § 25

minority, women, and veteran business enterprises in sports wagering	Study on the participation by minority business enterprises, women business enterprises, and veteran business enterprises in the sports wagering industry in the Commonwealth.
Task/deliverable	Statutory and Practical Significance
Sports wagering advertising study	Relates to: M.G.L. c. 23K, § 71 (2)(iv); M.G.L. c. 23N, § 23
	Study on different existing marketing affiliate payment structures and impact on players.

Research Review
To ensure the highest quality research, the MGC has assembled a research review committee. This committee is charged with providing the MGC and research teams with advice and feedback on gaming research design, methods, and analysis. Where additional expertise is needed, the MGC seeks advice from experts with specific subject matter expertise to review reports and advise on research matters.
Knowledge Translation and Exchange
To ensure findings from the MGC research program are accessed and used by key stakeholders, MGC engaged an organization with expertise in this area, the Gambling Research Exchange of Ontario (GREO), in FY23 to help develop a strategic plan, provide on-going training, consultation, and support to build in-house capacity to improve current KTE strategies, practices, and skill sets. In FY24, work on this strategic plan will include broadening the MGC’s network of safer gaming stakeholders, tailoring stakeholder engagement and consultation methodologies, and working to gather and mobilize knowledge in ways that align with stakeholder needs and preferences. In addition, the MGC, in collaboration with UMass Amherst and GREO, plans to hold an inaugural Research Conference in Spring 2024. The goal of this conference is to showcase findings from the 2024 Integrated Social and Economic Impacts Report, bring together a diverse network of stakeholders and researchers to discuss findings from the research agenda to date, collaborate on knowledge mobilization strategies, and develop strategies to broaden and deepen future research.

Next Steps

The process for developing and finalizing the FY24 research agenda following this initial presentation to the Commission will include a meeting with the Gaming Policy Advisory Committee (GPAC) for advice and discussion as required by [M.G.L. Chapter 23K §71](#), as well as a meeting with the Gaming Research Advisory Committee on April 4, 2023. The proposed agenda will then be presented to Commissioners in April, with a goal to finalize the FY24 research agenda by the end of April 2023.