



NOTICE OF MEETING AND AGENDA

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

Thursday | April 9, 2026 | 12:00 p.m.
VIA REMOTE ACCESS: 1-646-741-5292
MEETING ID/ PARTICIPANT CODE: 111 750 7356
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 - #586

1. Call to Order – Jordan Maynard, Chair

2. Meeting Minutes
 - a. March 12, 2026 **VOTE**

3. Racing Division – Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian
 - a. Lasix Administration Policy Revision

4. Legal Division – Kevin Scanlon, General Counsel; Justin Stempeck, Chief Deputy General Counsel
 - a. Request to Reopen Sports Wagering Licensing Process – Justin Stempeck, Chief Deputy General Counsel
 - b. 205 CMR 247.07: *Acceptance of Sports Wagers* – Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review



Massachusetts Gaming Commission

- and Adoption – Melanie Foxx, Associate General Counsel; Carrie Torrisi, Chief of Sports Wagering Division **VOTE**
- c. 205 CMR 248.10: *Account Deposits*– Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption – Melanie Foxx, Associate General Counsel; Carrie Torrisi, Chief of Sports Wagering Division **VOTE**
- d. 205 CMR 101.00: *MGL c. 23K Adjudicatory Proceedings* – Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption – Autumn Birarelli, Staff Attorney **VOTE**
- e. 205 CMR 134.08: *Submission of Application* – Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption – Autumn Birarelli, Staff Attorney **VOTE**
- f. 205 CMR 238.32: *Restricted Patrons* – Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption – Autumn Birarelli, Staff Attorney **VOTE**
- g. 205 CMR 248.12: *Account Withdrawals* – Discussion and Review of Regulation and Small Business Impact Statement for authorization to begin the promulgation process – Autumn Birarelli, Staff Attorney **VOTE**
- h. 205 CMR 138.69: *Entertainment, Filming or Photography within the Gaming Area* – Discussion and Review of Regulation Amendments and Small Business Impact Statement for authorization to begin the promulgation process – Jenna Hentoff, Deputy General Counsel; Caitlin Monahan, Director of Investigations and Enforcement Bureau; Burke Cain, Chief of the Gaming Agents Division; Dave DiOrio, Assistant Chief of the Gaming Agents Division/Compliance Coordinator **VOTE**
- i. Table Games Rules Update – Blackjack – Jenna Hentoff, Deputy General Counsel; Burke Cain, Chief of the Gaming Agents Division; Dave DiOrio, Assistant Chief of the Gaming Agents Division/Compliance Coordinator **VOTE**

5. Research and Responsible Gaming Division – Mark Vander Linden, Director of Research and Responsible Gaming

- a. Proposed FY27 Research Agenda

6. Sports Wagering Division – Carrie Torrisi, Division Chief of Sports Wagering

- a. Updates to Caesars House Rules – Griffin Miniutti, Compliance Officer II **VOTE**
- b. Update on 2026 Winter Olympics Sports Betting – Tom Lam, Compliance Operations Manager



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- c. FanDuel request to use an alternate method of KYC identity authentication at the time of sports wagering account establishment pursuant to 205 CMR 248.04(4) – Nathan Saylor, Technical Compliance Coordinator **VOTE**
 - I. Executive Session **VOTE**

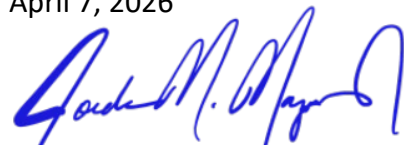
The Commission anticipates that it will convene in an Executive Session in conjunction with its review of FanDuel’s methods of KYC in accordance with G.L. c. 30A, § 21(a)(7), G. L. c. 4, § 7(26)(n), and G.L. c. 23N, § 6(i) to review certain materials in connection with the sports wagering operator’s processes and parameters during account creation related to customer verification and authentication, as these matters relate to cyber security within the Commonwealth, the public discussion or disclosure of which is likely to jeopardize public safety or cyber security, and further, which constitute trade secrets, competitively-sensitive information or proprietary information, the disclosure of which would be detrimental to the operator.

7. Commissioner Updates

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

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: April 7, 2026 | 12:00 p.m. EST

April 7, 2026



Jordan M. Maynard, Chair

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



Massachusetts Gaming Commission



Massachusetts Gaming Commission
Meeting Minutes

Date/Time: March 12, 2026, 10:00 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292

PARTICIPANT CODE: 111 592 2774

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

Commissioners Present:

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

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

Chair Maynard called to order the 584th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

2. [Meeting Minutes](#) (00:30)

The February 12, 2026 and February 20, 2026 public meeting minutes were included in the Commissioners' Packet on pages 5 through 17.

Commissioner Brodeur moved that the Commission approve the minutes of two regular public meetings from February 12, 2026 and February 20, 2026, as included in the Meeting Packet, subject to any corrections for typographical errors or other non-material matters. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed unanimously, 5-0.

3. Racing Division (01:31)

- a. Report on 2024 Unpaid Winnings and possible subsequent authorization for the Chief Financial & Accounting Officer to pay out funds approved by the Commission

Director of Racing and Chief Veterinarian Dr. Alexandra Lightbown explained that per statute, patrons have a year to cash in winning tickets. She stated that the request before the Commission was regarding winning tickets from 2024 that went unpaid by the end of 2025. She stated that the Racing Division was requesting that Chief Financial and Accounting Officer (“CFAO”) Derek Lennon pay out these funds to the purse accounts and Racing Stabilization Fund. *A memorandum regarding the 2024 unpaid winnings was included in the Commissioners’ Packet on page 18.*

Commissioner O’Brien moved that the Commission approve the following payments to the Commonwealth of Massachusetts for 2024 unclaimed winnings as included in the Commissioners’ Packet and discussed here today: \$115,489.53 from Plainridge Racecourse; \$106,597.67 from Sterling Suffolk Racecourse; and \$91,554.26 from Raynham/Taunton/Massasoit Greyhound Association, and further moved that the Commission authorize the Finance Division to distribute funds from unclaimed tickets from Plainridge Racecourse in the amount of \$115,489.53 to the Plainridge Racecourse purse account; from Sterling Suffolk Racecourse in the amount of \$106,597.67 to the Sterling Suffolk Racecourse purse account; and from Raynham/Taunton/Massasoit Greyhound Association in the amount of \$91,554.26 to the Racing Stabilization Fund. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed unanimously, 5-0.

4. Sports Wagering Division (04:39)

- a. House Rules Updates

I. FanDuel

Compliance Officer Brittany Costello presented proposed house rules updates for FanDuel. *A memorandum and the updated house rules were included in the Commissioners' Packet on pages 19 through 24.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

II. [DraftKings](#) (09:38)

Compliance Officer David Harrison presented proposed house rules updates for DraftKings. *A memorandum and the updated house rules were included in the Commissioners' Packet on pages 25 through 28.*

Commissioner O'Brien asked if other operators had rules where "cash out" would not apply to bonus bets. Sports Wagering Compliance and Operations Manager Andrew Steffen stated that he would have to review the other operators' house rules and would provide an answer to the Commission.

DraftKings' Director of Regulatory Compliance Alex Walder explained that the change would allow the "cash out" feature to be used for bonus bets which would provide better customer service to DraftKings' patrons. Chair Maynard noted that the change seemed more patron friendly.

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

III. [Fanatics](#) (16:04)

Manager Steffen presented proposed house rules updates for Fanatics. *A memorandum and the updated house rules were included in the Commissioners' Packet on pages 29 through 35.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

IV. [MGM Springfield](#) (19:48)

Manager Steffen presented proposed house rules updates for MGM Springfield. *A memorandum and the updated house rules were included in the Commissioners' Packet on page 36.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

V. [Plainridge Park Casino](#) (21:09)

Manager Steffen presented proposed house rules updates for Plainridge Park Casino ("PPC"). *A memorandum and the updated house rules were included in the Commissioners' Packet on page 37.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

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

5. Investigations and Enforcement Bureau (23:36)

a. Plainridge Park Casino's Request for an Amendment to the Beverage License

Licensing Manager Richard Lawless presented a request from PPC to amend its beverage license. *A memorandum and PPC's request to amend its beverage license were included in the Commissioners' Packet on pages 38 through 43.*

Upon inquiry by Chair Maynard, Manager Lawless confirmed that Chief of the Gaming Agents Division Burke Cain reviewed the request. Commissioner Brodeur noted that while the review of agenda items may be brief, the review process by Commission staff and materials included in the packet were significant.

Commissioner Skinner asked if Slice currently served alcohol and sought further clarification as to whether mixed drinks were served by the restaurant or the casino. Manager Lawless stated that Slice currently does not serve alcohol. He explained that PPC's food court was a contiguous area staffed by PPC employees. He noted that the people serving alcohol would be PPC employees.

Commissioner Brodeur moved that the Commission approve the request submitted by Plainridge Park Casino to amend its beverage license to permit the service of drinks containing liquor in the Food Court licensed area as included in the Commissioners' Packet and discussed here today. Commissioner Skinner seconded the motion.

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

b. Encore Boston Harbor's Request for Service Registration Exemption (28:16)

Manager Lawless presented Encore Boston Harbor's ("EBH") request for a service registration exemption for Kitchen Steward Porters. He stated that Kitchen Steward was an existing exempt position and that the Kitchen Steward Porter position only had one additional responsibility: to transport kitchen equipment from the casino warehouse to the casino. He stated that the Licensing Division recommended approval of EBH's request. *A memorandum and EBH's request were included in the Commissioners' Packet on pages 44 through 49.*

Commissioner Skinner moved that the Commission approve Encore Boston Harbor’s request for a Service Registration Exemption as included in the Commissioners’ Packet and discussed here today. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

c. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance related to wagers on an impermissible collegiate player proposition market by BetFair Interactive LLC d/b/a FanDuel (30:56)

Director of the Investigation and Enforcement Bureau (“IEB”) Caitlin Monahan stated that the IEB had eight recommendations for civil administrative penalties to present to the Commission. She noted that the Commission recently issued a decision regarding a noncompliance event by BetMGM, LLC (“BetMGM”) and that the Commission had asked the IEB to hold additional recommendations until that BetMGM decision was issued. She stated that the recommendations being brought forward at this meeting followed the Commission’s guidance from the BetMGM decision.

Director Monahan stated that the recommendations were based upon the following factors: the amount of wagers, the handle amount, whether the violation was of a regulation or statute, how long the noncompliance occurred for, whether the noncompliance was self-reported or identified by a third-party, whether the operator had similar noncompliance events in the past, the time since the last offense, remedial actions taken by the operators, whether the operator was forthcoming during the investigation, and fines from other jurisdictions.

Senior Enforcement Counsel Zac Mercer stated that the IEB recommended that the Commission assess a civil administrative penalty in the amount of \$5,000 against BetFair Interactive LLC d/b/a FanDuel (“FanDuel”). He stated that the IEB briefed the Commission regarding this noncompliance event on February 29, 2024. He stated that FanDuel had accepted nine wagers on an impermissible collegiate player proposition market over the course of two days for a total stake of \$69.81. He noted that FanDuel identified the impermissible market and removed it prior to the start of the game. He noted that all wagers were cancelled and refunded. He stated that the IEB investigated and communicated with FanDuel regarding the investigation and remedial measures. He stated that FanDuel agreed with the IEB’s recommendation of a \$5,000 civil assessment.

Commissioner O’Brien stated that she would prefer a higher fine on most of the IEB’s recommended fines but that she understood the rationale explained by Director Monahan regarding the scale of the event.

Commissioner Skinner stated that she was fine with accepting the IEB recommendation. She stated that the Commission came down hard on operators when it was required but that operators had stepped up their review of these types of matters. She expressed her expectation that noncompliance incidents would decline over time. Commissioner Brodeur stated that this process was a reflection of the regulated marketplace as compared to prediction markets which did not have these types of protections available for patrons.

Commissioner Skinner moved that the Commission adopt the IEB's recommendation on the issuance of a civil administrative penalty to BetFair Interactive, LLC d/b/a FanDuel in the amount of \$5,000, as discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

d. Review of the IEB's Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance related to prohibited player proposition wagers by BetMGM, LLC (41:13)

Enforcement Counsel Diandra Franks explained that the IEB recommended a civil administrative penalty of \$6,500 against BetMGM for a noncompliance event. She stated that the IEB briefed the Commission regarding this noncompliance event at a public meeting on February 24, 2025. She stated that BetMGM offered prohibited player proposition wagers for less than two hours, with one wager placed for a handle of \$10. She stated that the wager was part of a parlay and that the impacted leg was removed. She stated that the IEB investigated and communicated with BetMGM regarding the investigation and remedial measures. She stated that BetMGM was in agreement with the IEB's recommendation of a \$6,500 civil assessment.

Commissioner Hill moved that the Commission adopt the IEB's recommendation on the issuance of a civil administrative penalty to BetMGM in the amount of \$6,500, as discussed here today. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

e. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance related to wagers on an impermissible collegiate player proposition market by Crown MA Gaming, LLC d/b/a DraftKings (44:23)

Counsel Mercer explained that the IEB recommended a civil assessment in the amount of \$6,500 on DraftKings regarding noncompliance related to wagers on an impermissible collegiate player proposition market. He stated that the Commission was briefed on this matter on February 29, 2024. He stated that wagering on the impermissible market was available from January 5, 2024 at 5:03 P.M. to January 6, 2024 at 12:27 P.M. and was taken down before the game began. He stated that 13 wagers were placed for a total handle of \$457.80. He stated that the wagers were cancelled and refunded once the impermissible market was identified. He stated that the IEB investigated and communicated with DraftKings regarding the investigation and remedial measures. He stated that DraftKings was in agreement with the IEB’s recommendation of a \$6,500 civil assessment.

Commissioner Skinner noted that DraftKings had outlined steps to ensure their catalog matched what was permissible in Massachusetts. She stated that while steps one and three were followed, step two appeared to have been skipped. She asked how the noncompliance incident occurred if the offerings were reviewed to be accurate by the trading compliance team. Counsel Mercer stated that there was a disconnect in what was stated in the email and what was actually relayed to the compliance team.

Commissioner Brodeur moved that the Commission adopt the IEB’s recommendation on the issuance of a civil administrative penalty to Crown MA Gaming, LLC d/b/a DraftKings in the amount of \$6,500, as discussed here today. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

f. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance by American Wagering, Inc. d/b/a Caesars Sportsbook, related to wagers offered on “Tournament Total Red Cards”, an impermissible offering in violation of M.G.L. c. 23N, § 3, 205 CMR 247.01(2)(e) and the Massachusetts Sports Wagering Catalog (49:57)

Enforcement Counsel Nathaniel Kennedy explained that the IEB recommended a civil assessment in the amount of \$10,000 on American Wagering, Inc. d/b/a/ Caesars Sportsbook (“Caesars”) regarding impermissible offerings. He explained that the noncompliance occurred between June 12, 2024 and July 15, 2024 and that the Commission was initially briefed on this matter at the public meeting on February 6, 2025. He stated that six wagers were placed for a

total handle of \$8,270. He stated that all losses were voided and the one winning bet was refunded. He stated that the IEB investigated and communicated with Caesars regarding the investigation and remedial measures. He stated that Caesars was in agreement with the IEB's recommendation of a \$10,000 civil assessment.

Commissioner O'Brien noted that a trader had to make the active decision to override safety measures and asked if this was done intentionally. Counsel Kennedy stated that Caesars had indicated that the trader did not follow protocol. Commissioner O'Brien stated that the next time a similar noncompliance matter occurred she would expect a deeper dive into why an overt act was taken.

Commissioner Skinner moved that the Commission adopt the IEB's recommendation on the issuance of a civil administrative penalty to American Wagering, Inc. d/b/a Caesars Sportsbook in the amount of \$10,000, as discussed here today. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

[g. Review of the IEB's Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02\(2\), regarding noncompliance by FBG Enterprises Opc, LLC, d/b/a Fanatics \("Fanatics"\) related to wagers on Heisman Trophy winners, an unauthorized event in violation of 205 CMR 247.01\(1\), 205 CMR 247.01\(2\)\(i\), and the Massachusetts Sports Wagering Catalog \(54:37\)](#)

Counsel Kennedy explained that the IEB recommended a civil administrative penalty in the amount of \$7,500 against Fanatics regarding noncompliance related to offering an unauthorized event. He stated that the noncompliance occurred between January 22, 2025 and March 21, 2025 during which time 36 wagers were placed for a total handle of \$545.70. He stated that wagers were voided and that parlay wagers had the unauthorized leg removed. He stated that the IEB investigated and communicated with Fanatics regarding the investigation and remedial measures. He stated that Fanatics was in agreement with the IEB's recommendation of a \$7,500 civil assessment.

Commissioner O'Brien expressed that, generally speaking, she thought the recommended civil administrative penalties were too low. She stated that looking at the sports wagering industries' profits, a \$7,500 fine was low. Counsel Kennedy stated that the IEB reviewed mitigating factors including the root cause of the noncompliance and the impact on the patrons. He stated that there was a misunderstanding by the trader regarding whether wagering could be offered on the Heisman Trophy winner rather than an overt action. He stated that all wagers were voided before the Heisman Trophy was awarded. He stated that Fanatics had taken measures to develop new systems to alert to potential noncompliance on their platform.

Commissioner Hill moved that the Commission adopt the IEB’s recommendation on the issuance of a civil administrative penalty to FBG Enterprises Opco, LLC d/b/a Fanatics in the amount of \$7,500, as discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

h. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance related to wagers on an impermissible collegiate player proposition market by Crown MA Gaming, LLC d/b/a DraftKings (1:00:27)

Counsel Mercer explained that the IEB recommended a civil administrative penalty in the amount of \$10,000 against DraftKings regarding impermissible offerings. He stated that the IEB initially briefed the Commission on this matter on May 22, 2025. He stated that wagers were offered on the impermissible market from 8:44 P.M. to 10:43 P.M. on March 23, 2025 during which time 89 wagers were placed for a total handle of \$1,655. He stated that DraftKings resettled the wagers as void. He stated that the IEB investigated and communicated with DraftKings regarding the investigation and remedial measures. He stated that DraftKings was in agreement with the IEB’s recommendation of a \$10,000 civil assessment.

Chair Maynard asked if the patrons were made whole. Counsel Mercer stated that discretionary credit was issued by DraftKings as the noncompliance was not caught prior to the event. Chair Maynard stated that the regulated market ensured that customers had the best dispute resolution while illegal and pseudo-regulated markets did not offer these protections.

Commissioner Hill moved that the Commission adopt the IEB’s recommendation on the issuance of a civil administrative penalty to Crown MA Gaming, LLC d/b/a DraftKings in the amount of \$10,000, as discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

i. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance related to wagers on a prohibited athlete by BetMGM, LLC (“BetMGM”) (1:03:53)

Counsel Franks explained that the IEB recommended a civil administrative penalty in the amount of \$15,000 against BetMGM for two noncompliance events where wagers were made on a prohibited athlete. She stated that the first noncompliance event was from November 17, 2024 to November 18, 2024 and that the second noncompliance event occurred from July 5, 2024 through March 7, 2025. She stated that the Commission was briefed on these two noncompliance events on February 24, 2025 and June 17, 2025 and that the Commission requested that these two matters be joined.

Counsel Franks stated that 36 wagers were placed for a total handle of \$849 during the first noncompliance event. She stated that all of the straight bet wagers were voided and the impacted legs were removed from parlay wagers before the event occurred. She stated that during the second noncompliance event, no bets were placed by Massachusetts patrons, but the Sports Wagering Division was able to place two wagers on its test account. She stated that the IEB investigated and communicated with BetMGM regarding the investigation and remedial measures. She stated that BetMGM was in agreement with the IEB’s recommendation of a \$15,000 civil assessment.

Commissioner Skinner moved that the Commission adopt the IEB’s recommendation on the issuance of a civil administrative penalty to BetMGM in the amount of \$15,000, as discussed here today. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

j. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance by FBG Enterprises Opco, LLC, d/b/a Fanatics related to wagers on a UFC event involving Petr Yan, in violation of 205 CMR 247.01(1), 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog (1:07:48)

Counsel Kennedy explained that the IEB recommended a civil assessment in the amount of \$20,000 on Fanatics for offering wagering on an event with a prohibited athlete. He stated that wagering was offered on this athlete between July 4, 2025 through July 24, 2025 during which time 154 wagers were placed for a total stake of \$1,806.76. He stated that the Commission was briefed on this noncompliance event on September 4, 2025. He stated that the IEB investigated and communicated with Fanatics regarding the investigation and remedial measures. He stated that Fanatics was in agreement with the IEB’s recommendation of a \$20,000 civil assessment.

Commissioner Hill moved that the Commission adopt the IEB’s recommendation on the issuance of a civil administrative penalty to FBG Enterprises Opco, LLC d/b/a Fanatics in the amount of \$20,000, as discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

6. Research and Responsible Gaming Division (1:25:47)

a. GameSense Moving Forward: Introducing PlayWell Presentation

Director of Research and Responsible Gaming Mark Vander Linden explained that since 2015, the Commission had a relationship with the British Columbia Lottery Commission (“BCLC”) to implement the GameSense program. He stated that the Commission’s partnership with the BCLC was coming to a close and that the Commission would be sunsetting the use of the GameSense brand. He stated that the Commission has developed a new program called PlayWell as the next chapter of responsible gaming in Massachusetts. *The Introducing PlayWell presentation was included in the Commissioners’ Packet on pages 50 through 68.*

Director Vander Linden stated that GameSense branding would be transitioned to Playwell, including in the casinos and online. He stated that PlayWell was on track to launch on March 27, 2026 with the physical spaces in the casinos rebranded leading up to that launch.

Commissioner O’Brien congratulated the Research and Responsible Gaming Division for being able to pivot to the new brand in such a short period of time. Commissioner Brodeur echoed Commissioner O’Brien’s congratulations and thanked the Massachusetts Council on Gaming and Health (“MACGH”) for their collaboration with the Commission on this. He stated that the increased focus and language regarding player health was a way in which the system was being continuously improved.

Commissioner Skinner stated that she was excited about the potential opportunities for expansion now that the Commission had its own brand. She stated that she looked forward to the launch and potential expansion of PlayWell.

Chair Maynard thanked the BCLC and GameSense program for getting the Commission to where it was. He stated that it was time to grow and that he was excited for future opportunities now that the Commission had taken control of this product. Commissioner Hill congratulated the Commission staff for developing PlayWell and expressed appreciation that PlayWell would be keeping the existing advisor staff.

7. [Legal Division](#) (1:47:43)

- a. 205 CMR 133.02: Placement on the Self-exclusion List and 205 CMR 147.03: Notice and Patron Access – Discussion and Review of Regulation Amendments and Small Business Impact Statements for authorization to begin the promulgation process by Commission

Deputy General Counsel Jenna Hentoff presented proposed amendments to 205 CMR 133.02 and 205 CMR 147.03, which would remove references to GameSense and replace them with more general terms. *A memorandum, redlines of the proposed amendments, and Small Business Impact Statements were included in the Commissioners' Packet on pages 69 through 76.*

Commissioner Brodeur moved that the Commission approve the Small Business Impact Statements and the drafts of 205 CMR 133.02 and 205 CMR 147.03, as included in the Commissioners' Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. [Executive Session Minutes](#) (1:51:40)

Chair Maynard stated that he would take Agenda Items 8 and 9 before entering executive session as the Commission did not anticipate returning to the public meeting session following the executive session.

I. Executive Session (1:52:40)

Chair Maynard stated that the Commission anticipated that it would meet in executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(7) and c. 23N, § 6(i): December 19, 2022, January 17, 2023, January 18, 2023, January 19, 2023, and June 12, 2023.

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed unanimously, 5-0.

Chair Maynard noted that the Commission would not reconvene the public meeting session following the executive session.

Transcriber's Note: The Commission entered executive session at 12:00 P.M. and did not return to the public meeting session.

8. [Commissioner Updates](#) (1:51:49)

Chair Maynard commended Commissioner Skinner for speaking at the NEXT conference in New York.

9. [Other](#) (1:51:58)

Hearing no other business, Chair Maynard returned to Agenda Item 7(b).

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated March 10, 2026.](#)
2. [Commissioners' Packet from the March 12, 2026, meeting](#) (posted on massgaming.com).



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing
Justin Stempeck, Chief Deputy General Counsel

CC: Dean Serpa, Executive Director
Kevin Scanlon, General Counsel

DATE: April 9, 2026

RE: Furosemide Administration Program Revision

Furosemide (Lasix, Salix) is the only medication approved for use on race day. CMR 3.29(6)(b) reads in part: "The use of furosemide shall be permitted under the following circumstances on association grounds where a detention barn is not utilized:

1. Furosemide shall be administered by single intravenous injection no less than four hours prior to post time for the race for which the horse is entered."

A comprehensive review of the Furosemide Administration Program was presented to the Commissioners at the February 19, 2015 Massachusetts Gaming Commission meeting. The meeting can be found here: [MGC Open Meeting - February 19, 2015 - Massachusetts Gaming Commission](#). One of the suggestions that came out of that meeting was the formation of a Lasix working group including stakeholders to discuss enforcement policies regarding this regulation. The Lasix working group met several times. Their recommendations were presented to the Commissioners at the April 16, 2015 Massachusetts Gaming Commission meeting. The meeting can be found here: [MGC Open Meeting - April 16, 2015 - Massachusetts Gaming Commission](#). A fifteen-minute grace period was recommended, with the trainer being fined, but the horse being allowed to be treated and race. If the horse was later than fifteen minutes, the horse would also be scratched (not allowed to race).

This program went into effect for the 2015 race meets and has been in use since then. It is now felt the program has run its course. The recommendation is to eliminate the fifteen-minute



Massachusetts Gaming Commission

grace period and any horse not administered Lasix at least four hours before post time will be scratched. This change in policy would be extensively publicized by email to trainers with Lasix horses, by our Division of Racing Trainers' Manual which is posted on the MGC website and available in the MGC Plainridge Racing office, HHANE website, announced at the Opening Day meeting with the horsemen, and signs at the Lasix administration stall and Paddock.



Massachusetts Gaming Commission

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-@TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Justin Stempeck, Chief Deputy General Counsel

DATE: April 3, 2026

RE: Bet365 Request for Opening of Sports Wagering Licensure Process

I. Introduction

This matter comes before the Commission per the request of Bet365 to apply for a Category 3 Sports Wagering License. More specifically, Bet365 has requested that the Commission take official action to reopen the sports wagering license application process. The memorandum below addresses the history of the sports wagering licensing process as well as certain legal and policy considerations relative to Bet365's request.

II. Background

After the passage of the Sports Wagering statute, G.L. c. 23N, the Commission posted a notice of intent on August 17, 2022, to gauge interest from those companies that were interested in applying for sports wagering licenses. Responses to the notice of intent were due August 31, 2022, and 39 potential applicants indicated an interest in licenses. On October 7, 2022, the Commission released a scoping survey for companies interested in applying for a license. The scoping survey was due by October 17, 2022. Designation letters were sent to potential applicants on October 28, 2022, and included all necessary application materials. The applications were due by November 21, 2022. 16 companies applied for various sports wagering license types with three applicants eventually withdrawing, one applicant's application being deemed incomplete and two others later ceasing operations in Massachusetts after acquiring their licenses.

Pursuant to G.L. c. 23N there are a certain number of available sports wagering licenses for each licensed category as detailed below:



Massachusetts Gaming Commission

| License Type | Maximum Allowed per Statute | # Currently Available | Companies Currently licensed |
|--|-----------------------------|-----------------------|--------------------------------|
| Category 1 (retail at casino) | 4 | 1 ¹ | EBH, MGM, PPC |
| Category 2 (retail at racing) | 3 ² | 3 | N/A |
| Category 3 (mobile tethered to racing) | 3 | 3 | N/A |
| Category 3 (mobile tethered to casino) | 6 | 2 | Fanatics, PSI, BetMGM, Caesars |
| Category 3 (fully mobile / untethered) | 7 | 4 | DraftKings, FanDuel, BallyBet |

Of relevant note to this discussion, there are currently 4 mobile-only sports wagering operator licenses available.

III. Discussion

The first question to address is whether the Commission is interested in reopening the sports wagering licensing application process. As noted above, Bet365 has made a specific request for the Commission to do so but there may be other companies that express a similar interest and ultimately also apply.

Staff, including the Legal, Sports Wagering and IEB Divisions, have discussed this matter and would recommend the evaluation of a timeline at a public meeting followed by the posting of a Notice of Intent for a set period to evaluate how many potential new applicants exist. The timeline would also establish when the new licensing application period would open and close, based in part on the number of expected applications. It is unclear how many possible applicants exist beyond Bet365 currently.

If the Commission receives more applications for the Category 3 mobile only licenses than are available, the Commission will need to create a competitive evaluation process. This process does not currently exist in regulation or statute and was not required in the evaluation of the original slate of applicants as there were fewer applicants than licenses. The posting of the notice of intent would be an effort to plan for such a contingency as the drafting of these regulations could take significant time and effort.

¹ A Region C casino, if built, would have a right to a Sports Wagering license.

² This number could increase if the legislature allowed additional racing licensees.





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

FROM: Melanie Foxx, Associate General Counsel, Legal
Carrie Torrisi, Chief, Sports Wagering Division

CC: Kevin Scanlon, General Counsel, Legal
Justin Stempeck, Chief Deputy General Counsel, Legal
Kathleen Kramer, Chief Enforcement Counsel, IEB

DATE: April 9, 2026

RE: Proposed Amendment to 205 CMR 247.07: *Acceptance of Sports Wagers* and 205 CMR 248.10: *Account Deposits*

Introduction

Enclosed for the Commission's consideration are the final drafts of 205 CMR 247.07: *Acceptance of Sports Wagers* and 205 CMR 248.10: *Account Deposits*. The regulation was first presented on February 12, 2026, and the Commission voted to begin the promulgation process. The regulation is now back before the Commission with an amended small business impact statement, and a request for a vote for final adoption. The regulatory authority is set out under M.G.L. c. 23N § 4.

Discussion

The amendments aim to close a loophole related to the use of credit cards (indirectly) to fund sports wagering accounts and the acceptance of sports wagers within a Sports Wagering Facility or Sports Wagering Area. Current rules prohibit sports wagering operators from allowing credit cards to be used to place bets, either directly or indirectly. *See* 205 CMR 247.07(7) and 248.10(3).

After taking into consideration the concerns expressed by the Commission at the February 12, 2026, public meeting, the Sports Wagering, IEB, and Legal Divisions met to discuss the regulation language. The intent of the initial draft was to capture the types of prepaid access instruments that can be funded via credit cards and *not* reloadable prepaid debit cards. The revised draft does not prohibit the acceptance of operator-branded gift cards *or* reloadable prepaid debit cards (unless it is later determined that they can be loaded with a credit card).



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The Legal Division revised the language to better reflect its purpose, which is to ban the use of Visa and Mastercard gift cards. Even though a revision was made, it is considered a non-substantive update because it does not change the regulation amendment's overall intent.

February 12, 2026, vote to approve the draft language below (Option #1):

- (1) Approved methods for funding Sports Wagering Accounts include:
 - (a) Cash or cash equivalents;
 - (b) Foreign currency and coin converted to U.S. currency;
 - (c) Electronic funds transfers (EFTs), including online and mobile payment systems;
 - ~~(d) Debit instruments, including debit cards and prepaid access instruments;~~
 - ~~(e) Sports wagering operator branded gift cards;~~
 - (f) Promotional Gaming Credits;
 - (g) Sports Wager Payouts;
 - (h) Adjustments made by the Sports Wagering Operator with documented notification to the patron; and
 - (i) Any other means approved by the Commission or its designee.

The final draft of the language reads as follows:

- (2) Approved methods for funding Sports Wagering Accounts include:
 - (a) Cash or cash equivalents;
 - (b) Foreign currency and coin converted to U.S. currency;
 - (c) Electronic funds transfers (EFTs), including online and mobile payment systems;
 - ~~(d) Debit instruments, including debit cards and prepaid access instruments, excluding those that can be purchased or loaded with a credit card;~~
 - (e) Promotional Gaming Credits;
 - (f) Sports Wager Payouts;
 - (g) Adjustments made by the Sports Wagering Operator with documented notification to the patron; and
 - (h) Any other means approved by the Commission or its designee.

The final draft was posted on the Commission's website prior to the public hearing, which was held on March 24, 2026. It was also shared by the Sports Wagering Division with all the licensed sports wagering operators.

There was one public comment received from one Sports Wagering Operator on the initial drafted language, and the same operator reviewed the final draft language and responded that they did not have any additional comments. The Commission did not receive any other comments.



Massachusetts Gaming Commission

247.07: Acceptance of Sports Wagers

- (1) Available Sports Wagers Must Be Displayed to the Public. The display must include the odds and a brief description of the Sporting Event and wagering proposition.
- (2) A Sports Wagering Operator may not accept a Sports Wager on a Sporting Event unless the availability of that Wager is posted in accordance with 205 CMR 247.07(1).
- (3) A Sports Wagering Operator may not set lines or odds or offer wagering propositions designed for the purposes of ensuring that a patron will win a Sports Wager or a series of Sports Wagers, unless the lines, odds, or wagering propositions are offered in connection with a promotional offer made in accordance with 205 CMR 247.09.
- (4) Sports Wagers may only be placed from:
 - (a) A sports wagering counter or other counter locations within a Sports Wagering Facility or Sports Wagering Area as approved by the Commission;
 - (b) A Sports Wagering Kiosk, within a Sports Wagering Facility or Sports Wagering Area and in a location approved by the Commission;
 - (c) A designated counter in the cashier's cage within a Sports Wagering Facility or Sports Wagering Area for the redemption of winning sports wagering tickets or vouchers; or
 - (d) A mobile application or digital platform approved by the Commission.
- (5) Sports wagers within a Sports Wagering Facility or Sports Wagering Area may only be conducted with chips, tokens, electronic cards, or:
 - (a) Cash or cash equivalents;
 - (b) Foreign currency and coin converted to U.S. currency;
 - (c) Electronic funds transfers (EFTs), including online and mobile payment systems;
 - (d) Debit instruments, including debit cards and prepaid access instruments, excluding those that can be purchased or loaded with a credit card;
 - (e) Promotional gaming credits;
 - (f) Winning sports wagering tickets or vouchers;
 - (g) Sports Wagering Accounts; or
 - (h) Any other means approved by the Commission or its designee.
- (6) Sports wagering transactions using a mobile application or other digital platform may only be conducted by a patron physically located within the Commonwealth, using their Sports Wagering Account.
- (7) A Sports Wagering Operator shall prohibit any use of credit cards, either directly or indirectly, including without limitation through an account funded by credit card, in placing Sports Wagers.
- (8) A Sports Wagering Operator shall record the Personally Identifiable Information required to register for a Sports Wagering Account under 205 CMR 248.03(1) before accepting anonymous Sports Wagers in excess of \$10,000 or issuing payouts on anonymous Sports Wagers in excess of \$10,000.
 - (a) The Sports Wagering Operator shall not knowingly allow, and shall take reasonable steps to prevent, the circumvention of reporting requirements through a patron making a structured transaction, including multiple Sports Wagers or a series of Sports Wagers that are designed to accomplish indirectly that which could not be accomplished directly. A Sports Wager or wagers need not exceed the dollar thresholds at any single Sports Wagering Operator in any single day in order to constitute prohibited structuring.
 - (b) The Sports Wagering Operator shall not knowingly assist, encourage or instruct a player in structuring or attempting to structure Sports Wagers.
 - (c) 205 CMR 247.07(8) does not prohibit a Sports Wagering Operator from informing a player of the regulatory requirements imposed upon the Sports Wagering Operator, including the definition of structured Sports Wagers.
- (9) A Sports Wagering Operator must provide for the patron's review and finalization of a Sports Wager before the Sports Wagering Operator accepts it. The Sports Wagering Operator shall not change a Sports Wager after the patron has reviewed and finalized the wager. To the extent permitted by approved House Rules, a patron may change a Sports Wager after the patron has reviewed and finalized the wager.



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this amended small business impact statement in accordance with G.L. c. 30A §5, relative to the proposed promulgation of **205 CMR 247.00: *Uniform Standards of Sports Wagering***, specifically, **205 CMR 247.07: *Acceptance of Sports Wagers***. A public hearing was held on March 24, 2026, discussing the proposed regulation amendment. This regulation was promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth and is primarily governed by G.L. c. 23N §4.

This regulation governs the acceptance of sports wagers by licensed sports wagering operators. In accordance with G.L. c. 30A §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

Presently, there is no less stringent compliance or reporting requirements for small businesses. There are no small businesses that the Commission anticipates will be impacted by the amendment.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

The proposed regulation does not impose any reporting requirements for small businesses.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

The regulation does not impose any consolidating or simplifying compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:

There are no standards applicable to small businesses set forth, however, this regulation uses design standards to encourage uniformity surrounding the acceptance of sports wagers within a Sports Wagering Facility or Sports Wagering Area.



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5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

The regulation is not likely to adversely impact small businesses as it applies to licensed sports wagering operators.

Massachusetts Gaming Commission
By:



Melanie Foxx
Associate General Counsel

Dated: April 9, 2026



Massachusetts Gaming Commission

248.07: continued

- (2) If the system does not recognize the authentication credentials when entered, an explanatory message shall be displayed to the patron which prompts the patron to try again. The error message shall be the same regardless of which authentication credential is incorrect.
- (3) Patrons must be given the option to use a multi-factor authentication process when accessing their account. In addition, a multi-authentication process shall be employed for the retrieval or reset of a patron's forgotten or lost authentication credentials.
- (4) Current account balance information, including any restricted wagering credits and unrestricted funds, and transaction options shall be available to the patron once the patron has been authenticated. All restricted wagering credits and unrestricted funds that may expire shall be identified separately.
- (5) The Operator shall employ a mechanism allowing for an account to be locked in the event that suspicious authentication activity is detected including, but not limited to, three consecutive failed access attempts in a 30-minute period. A multi-factor authentication process shall be employed for the account to be unlocked.

248.08 : Sufficient Account Balance

Wagers and withdrawals will not be accepted which would cause the available balance of a Sports Wagering Account to fall below \$0. Any account not updated when a transaction is completed shall be inoperable until the transaction is posted and the account balance updated.

248.09: Financial Transactions

Operators shall provide a patron written confirmation or denial of every financial transaction initiated using the patron's Sports Wagering Account, including:

- (a) The type of transaction (deposit/withdrawal);
- (b) The transaction value; and
- (c) For denied transactions, a descriptive message as to why the transaction did not complete as initiated.

248.10: Account Deposits

- (1) A Sports Wagering Account may be funded using approved methods which shall produce a sufficient audit trail for verification of the source of the wagers.
- (2) Approved methods for funding Sports Wagering Accounts include:
 - (a) Cash or cash equivalents;
 - (b) Foreign currency and coin converted to U.S. currency;
 - (c) Electronic funds transfers (EFTs), including online and mobile payment systems;
 - (d) Debit instruments, including debit cards and prepaid access instruments, excluding those that can be purchased or loaded with a credit card;
 - (e) Promotional Gaming Credits;
 - (f) Sports Wager Payouts;
 - (g) Adjustments made by the Sports Wagering Operator with documented notification to the patron; and
 - (h) Any other means approved by the Commission or its designee.
- (3) No deposits may be made by credit card, either directly or indirectly, including without limitation through an account funded by credit card, and no Wagering on credit is allowed.
- (4) The Sports Wagering Account shall be credited for any deposit in accordance with the system of internal controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.00: *Additional Uniform Standards of Accounting Procedures and Internal Controls for Sports Wagering*.
- (5) The proceeds of a check may first need banker's clearance. Holding periods will be determined by the Sports Wagering Operator and communicated to the patron.



March 23, 2026

Via E-Mail to Melanie.Foxx@massgaming.gov

Massachusetts Gaming Commission

101 Federal St., 12th Floor

Boston, MA 02110

RE: SPORTS WAGERING REGULATIONS RELATED TO DEPOSIT METHODS

Dear Massachusetts Gaming Commission:

In response to the request for feedback to changes proposed by the Massachusetts Gaming Commission (“Commission”) to prohibit the use of prepaid debit cards and allow the use of operator branded gift cards, DraftKings, Inc. (“DraftKings”) submits the following comments for consideration. As a leading sports wagering operator in the United States, DraftKings has first-hand experience with sports wagering regulatory frameworks, and submits these comments based on its operational knowledge in multiple regulated markets. DraftKings would also welcome the opportunity to speak directly with the Commission about the comments addressed below.

The Commission proposed the following modification to both 205 CMR 247.07(5) and 205 CMR 248.10(2):

- (1) Approved methods for funding Sports Wagering Accounts include:
 - (a) Cash or cash equivalents;
 - (b) Foreign currency and coin converted to U.S. currency;
 - (c) Electronic funds transfers (EFTs), including online and mobile payment systems;
 - (d) Debit instruments, including debit cards and ~~excluding prepaid debit cards; prepaid access instruments;~~
 - (e) Sports wagering operator branded gift cards;
 - (f) Promotional Gaming Credits;
 - (g) Sports Wager Payouts;
 - (h) Adjustments made by the Sports Wagering Operator with documented notification to the patron; and
 - (i) Any other means approved by the Commission or its designee

DraftKings appreciates the Commission’s express inclusion of sports wagering operator branded gift cards as acceptable payment methods.

Reason for Change:

DraftKings respectfully requests that the Commission modify its proposal to permit patrons to continue using certain reloadable prepaid cards that are issued to, verified for, and nontransferable by a specific patron. These products are distinct from the types of prepaid cards about which commissioners raised concerns during the Commission’s public meeting on the subject.

Reloadable prepaid cards function more like debit cards than retail prepaid gift cards. They must be registered to an individual patron with a financial institution that has completed know-your-customer (KYC) verification and can only be used by that named individual. This approach directly addresses concerns about potential use by minors, as only the verified account holder can fund and use the card.



Any attempt to use such a card within a wagering account must still pass the operator's own identity and age verification controls.

DraftKings' proposed language aligns with regulatory frameworks adopted in multiple jurisdictions, including Colorado, Illinois, Indiana, Louisiana, Maryland, Michigan, Missouri, New Jersey, North Carolina, Pennsylvania, Virginia, and West Virginia. Like Massachusetts, some of these states prohibit the use of credit cards to fund sports wagering accounts through statute or regulation. These products are typically funded through debit, ACH, or cash equivalents. If the Commission wishes, it could add an additional provision to prohibit the use of any such instrument that could be funded by a credit card.

Proposed Final Rule Language:

- (1) Approved methods for funding Sports Wagering Accounts include:
 - (a) Cash or cash equivalents;
 - (b) Foreign currency and coin converted to U.S. currency;
 - (c) Electronic funds transfers (EFTs), including online and mobile payment systems;
 - (d) Debit instruments, including debit cards and *a patron's reloadable prepaid card, which has been verified as being issued to the patron and is nontransferable, and excluding other prepaid debit cards; ~~prepaid access instruments;~~*
 - (e) *Sports wagering operator branded gift cards;*
 - (f) Promotional Gaming Credits;
 - (g) Sports Wager Payouts;
 - (h) Adjustments made by the Sports Wagering Operator with documented notification to the patron; and
 - (i) Any other means approved by the Commission or its designee

* * * * *

Thank you for your consideration of DraftKings' comments regarding the Commission's proposed changes to 205 CMR 247.07 and 205 CMR 248.10. Please feel free to reach out should you or anyone else at the Commission have any questions about our submission or our experience in other regulated jurisdictions.

Sincerely,

DraftKings Inc.



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this amended small business impact statement in accordance with G.L. c. 30A §5, relative to the proposed promulgation of **205 CMR 248.00: Sports Wagering Account Management**, specifically, **CMR 248.10: Account Deposits**. A public hearing was held on March 24, 2026, discussing the proposed regulation amendment. This regulation was promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth and is primarily governed by G.L. c. 23N §4.

This regulation updates the approved methods for funding sports wagering accounts. In accordance with G.L. c. 30A §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

Presently, there is no less stringent compliance or reporting requirements for small businesses. There are no small businesses that the Commission anticipates will be impacted by the amendment.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

The proposed regulation does not impose any reporting requirements for small businesses.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

The regulation does not impose any consolidating or simplifying compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:

There are no standards applicable to small businesses set forth, however, this regulation uses design standards to encourage uniformity surrounding the approved methods to fund a sports wagering account.



Massachusetts Gaming Commission

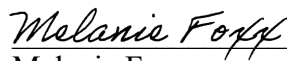
5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

The regulation is not likely to adversely impact small businesses as it applies to licensed sports wagering operators.

Massachusetts Gaming Commission
By:



Melanie Foxx
Associate General Counsel

Dated: April 9, 2026



Massachusetts Gaming Commission

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

From: Autumn Birarelli, Staff Attorney

Cc: Justin Stempeck, Chief Deputy General Counsel
Jenna Hentoff, Deputy General Counsel

Re: 205 CMR 101.00: M.G.L. c. 23K Adjudicatory Proceedings
205 CMR 134.08: Submission of Application
205 CMR 238.32: Restricted Patrons

Date: April 9, 2026

Introduction

Enclosed for the Commission's consideration are the proposed final drafts of 205 CMR 101.00: M.G.L. c. 23K Adjudicatory Proceedings, 205 CMR 134.08: Submission of Application, and 205 CMR 238.32: Restricted Patrons. These regulation amendments are authorized by G.L. c. 23K, §§ 4 and 5 and G.L. c. 23N, §§ 4 and 11(a). The regulations were first presented for initial discussion and review at the public meeting on February 12, 2026 at which time the Commission approved the amendments to the regulations for promulgation via the normal promulgation process.

A public hearing for these regulations was held on March 24, 2026. No public comments were received at the hearing or submitted in writing, and no changes have been made to the regulations since the initial presentation to the Commission on February 12, 2026. In addition to the proposed final drafts, an Amended Small Business Impact Statement for each regulation is also included for review. The Legal Division is now seeking a vote by the Commission for final adoption.

Discussion

Amendments were made to the following regulations as part of a continued review to correct typographical errors and incorrect citations, as well as ensure regulatory language is consistent.



Massachusetts Gaming Commission

205 CMR 101.00 regulates adjudicatory proceedings before the Massachusetts Gaming Commission (“Commission”). A correction was made to a citation in 205 CMR 101.02(4) and language was changed in 205 CMR 101.03(7) and (8) to be consistent throughout the regulation.

205 CMR 134.08 regulates the application process for individual and vendor licensure and registration. A correction was made to an internal citation in 205 CMR 134.08(1)(b).

205 CMR 238.32 regulates internal control requirements regarding restricted patrons. A correction was made to an internal citation in 205 CMR 238.32(3)(e).

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 101.00: M.G.L. C. 23K ADJUDICATORY PROCEEDINGS

Section

101.01: Hearings Before the Commission

101.02: Review of Orders or Civil Administrative Penalties/Forfeitures Issued by the Bureau,
Commission Staff, or the Racing Division

101.03: Review by the Commission of Decisions of the Hearing Officer

101.04: Informal Disposition of an Adjudicatory Proceeding

101.01 : Hearings Before the Commission

(1) Hearings held before the full commission pursuant to 205 CMR 101.01 shall be adjudicatory proceedings conducted in accordance with M.G.L. c. 30A, §§ 10 and 11. All hearings shall be further held under 205 CMR 101.00, as applicable, and 801 CMR 1.02: *Informal/Fair Hearing Rules*, unless the applicant/petitioner makes a written request for a hearing under 801 CMR 1.01: *Formal Rules*. In that event the commission shall determine, based on the facts and circumstances of the matter, whether 801 CMR 1.01 or 1.02 will apply in order to ensure a fair outcome. Such determination shall be based on such factors as the complexity of the issues presented, whether all parties are represented by counsel, and similar considerations. Conflicts between 801 CMR 1.01 or 1.02 and 205 CMR 101.00 shall be resolved in favor of 205 CMR 101.00. If the commission grants a request for a hearing to be held pursuant to 801 CMR 1.01, the provisions of 801 CMR 1.01(1), (2), (3), (5), (6), (11) and (14) shall not apply.

(2) The following types of adjudicatory hearings shall be held directly, in the first instance, by the commission:

(a) Suitability hearings before the commission pursuant to M.G.L. c. 23K, § 17(f), concerning any findings of fact, recommendations and/or recommended conditions by the Bureau relative to the suitability of the applicant for an initial gaming license or renewal of a gaming license, including without limitation, recommendations and recommended conditions resulting from the RFA-1 or new qualifier process pursuant to 205 CMR 115.00: *Phase 1 and New Qualifier Suitability Determinations, Standards and Procedures*.

(b) Hearings regarding the failure of a gaming licensee or qualifier to maintain adequate suitability as set forth in 205 CMR 115.01(4) and any adverse action taken against a gaming licensee or qualifier as a result of said failure.

(c) Hearings regarding the termination, revocation or suspension of a category 1 or category 2 gaming license issued by the commission pursuant to M.G.L. c. 23K, and/or the addition or modification of a condition thereto, or the termination, revocation or suspension of a license to conduct a racing meeting pursuant to M.G.L. c. 128A.

(d) Hearings regarding the transfer of a category 1 or category 2 gaming license or the transfer of a license to conduct a racing meeting or related to the transfer of interest in a category 1 or category 2 gaming license or gaming establishment in accordance with 205 CMR 116.08 through 116.10;

(e) Hearings regarding the assessment of a civil administrative penalty pursuant to M.G.L. c. 23K, § 36, against a category 1 or category 2 gaming licensee or a racing meeting licensee.

(f) Hearings regarding the approval or amendment of the gaming licensee's Operation Certificate as discussed in 205 CMR 151.00: *Requirements for the Operations and Conduct of Gaming at a Gaming Establishment*;

(g) For purposes of reviewing a petition to reopen a mitigation agreement in accordance with 205 CMR 127.04: *Commission Review of a Petition to Reopen a Mitigation Agreement*.

(h) Any challenge to the certification or denial of certification of an independent testing laboratory in accordance with 205 CMR 144.06: *Independent Testing Laboratory Certification and Auditing*.

(i) Any challenge to the certification or denial of certification as a gaming school in accordance with 205 CMR 137.01(4).

(j) Review of an application for a gaming beverage license, or request to amend, alter, or add a licensed area, pursuant to 205 CMR 136.03(4).

101.01 : continued

(3) Any request for such a hearing shall be filed with the clerk of the commission on a form provided by the clerk. Such a request shall not operate as a stay of the underlying action unless specifically allowed by the commission upon motion of the aggrieved party. A request for a stay may be allowed at the commission's discretion if one or both of the following two circumstances are demonstrated by the aggrieved party:

- (a) 1. there is a likelihood that the party seeking the stay will prevail on the merits of the case; and
- 2. there is a likelihood that the moving party will be harmed irreparably absent a stay.
- (b) 1. the consequences of the decision(s) to be made in the case are far-reaching;
- 2. the immediate impact upon the parties in a novel and complex case is substantial; or
- 3. a significant legal issue(s) is involved.

(4) In order to be considered by the commission, a request for a hearing must be filed no later than 30 days from the date the complained of action was taken, except in the event of civil administrative penalties. The request for review of a civil administrative penalty issued by the Bureau pursuant to M.G.L. c. 23K, § 36 shall be filed no later than 21 days after the date of the Bureau's notice of issuance of the civil administrative penalty and such a request must comply with the provisions of M.G.L. c. 23K, § 36(e). In the case of a temporary suspension of a license by the Bureau in accordance with M.G.L. c. 23K, § 35(e), a gaming licensee shall be entitled to a hearing before the Commission within seven days after the suspension was issued.

(5) The request for a hearing shall include:

- (a) the contact information of the party requesting the hearing;
- (b) the contact information of counsel representing the party requesting the hearing, if any; and
- (c) a brief description of the basis for the request for the hearing. In the event that a temporary suspension has been issued in accordance with M.G.L. c. 23K, § 35(e), at its election the licensee may include a request that the hearing be scheduled within seven days of the date of the issuance of the suspension. If the matter involves a civil administrative penalty, the request shall include a written statement denying the occurrence of any of the acts or omissions alleged by the Bureau in the notice, or assert that the amount of the proposed civil administrative penalty is excessive.

(6) The failure of a party to provide a specific description of the basis for the request for hearing may result in the dismissal of the request per the discretion of the commission.

(7) Any adjudicatory hearing conducted under 205 CMR 101.01 may be closed to the public at the request of either party, or on the commission's own initiative, in order to protect the privacy interests of either party or other individual, to protect proprietary or sensitive technical information including, but not limited to, software, algorithms and trade secrets, or for other good cause shown. Such a determination rests in the sole discretion of the commission.

(8) Pursuant to M.G.L. c. 23K, § 3(h), the chair may direct that all of the commissioners participate in the hearing and decision of the matter before the commission. In the alternative, pursuant to M.G.L. c. 23K, § 3(h), the chair with the concurrence of one other commissioner may appoint a single commissioner to preside over the hearing. The notice scheduling the time and place for the hearing shall specify whether the commission or a designated individual shall act as presiding officer in the particular case.

(9) Burden of Proof.

- (a) The applicant shall have the affirmative obligation to establish by clear and convincing evidence both its affirmative qualification for licensure and the absence of any disqualification for licensure.
- (b) In the case of a recommendation to terminate, revoke or suspend a category 1 or category 2 gaming license, or a license to conduct a racing meeting, the bureau or the racing division, as appropriate, shall have the affirmative obligation to establish by substantial evidence grounds upon which the commission should terminate, revoke or suspend the licensee's category 1 or category 2 gaming license or the licensee's license to conduct a racing meeting.

101.01 : continued

(c) In the case of an adverse action taken against a gaming licensee or qualifier for failure to maintain their suitability pursuant to 205 CMR 115.01(4) the Bureau or the racing division, as appropriate, shall have the affirmative obligation to establish by substantial evidence the lack of clear and convincing evidence that the gaming licensee or qualifier remains suitable.

(d) In the case of a transfer of interest, the gaming licensee shall have the affirmative obligation to establish by clear and convincing evidence its compliance with 205 CMR 116.09: *Approval*.

(e) In the case of a civil administrative penalty, the Bureau shall have the obligation to prove the occurrence of each act or omission by a preponderance of the evidence.

(10) Decisions. Upon completion of the hearing, the Commission shall render a written decision as promptly as administratively feasible, in accordance with M.G.L. c. 30A, § 11(8). The written decision of the Commission shall be the final decision of the Commission.

(11) Appeal. Pursuant to M.G.L. c. 23K, § 17(g), the applicant and/or the gaming licensee shall not be entitled to any further review from the Commission's determination of suitability. Decisions by the Commission concerning the matters set forth in 205 CMR 101.01(2)(b) may be reviewed by the appropriate court pursuant to the provisions of M.G.L. c. 30A.

101.02 : Review of Orders or Civil Administrative Penalties/Forfeitures Issued by the Bureau, Commission Staff, or the Racing Division

(1) An aggrieved party may file a request for review of an order, decision, or civil administrative penalty issued by the Bureau, where applicable, relative to the interpretation or application of a statute, regulation, or other applicable authority, or order, decision, or forfeiture issued by the racing judges or stewards, other than those enumerated in 205 CMR 101.01(2), with the clerk of the Commission on a form provided by the clerk. A request for review shall not operate as a stay of the order, decision, or civil administrative penalty/forfeiture, unless specifically allowed by the hearing officer upon motion of the aggrieved party. A request for a stay may be allowed at the hearing officer's discretion if one or both of the following two circumstances are present:

- (a) 1. there is a likelihood that the party seeking the stay will prevail on the merits of the case; and
2. there is a likelihood that the moving party will be harmed irreparably absent a stay.
- (b) 1. the consequences of the decision(s) to be made in the case are far-reaching;
2. the immediate impact upon the parties in a novel and complex case is substantial; or
3. a significant legal issue(s) is involved.

(2) All requests for review, aside from those for civil administrative penalties or an appeal in the case of any person penalized or disciplined by the racing officials of a meeting licensed by the Commission, must be filed no later than 30 days from the date of the order or decision. The request for review of a civil administrative penalty issued by the Bureau pursuant to M.G.L. c. 23K, § 36 shall be filed within 21 days after the date of the Bureau's notice of issuance of the civil administrative penalty and such a request must comply with the provisions of M.G.L. c. 23K § 36(e). The request for an appeal in the case of any person penalized or disciplined by the racing officials of a meeting licensed by the Commission must be filed within ten days of the date of said penalty or imposition of said discipline.

In the case of the temporary suspension of a license by the Bureau in accordance with M.G.L. c. 23K, § 35(e), a licensee shall be entitled to a hearing before a hearing officer within seven days after the suspension was issued.

(3) The request for review shall include:

- (a) contact information of the party requesting review;
- (b) contact information of counsel representing the party requesting review, if any;
- (c) a specific description of the basis for the request for review. In the event that a temporary suspension has been issued in accordance with M.G.L. c. 23K, § 35(e), at its election, the licensee may include a request that the hearing be scheduled within seven days of the date of the issuance of the suspension.

101.02: continued

If the matter involves a civil administrative penalty, the request shall include a written statement denying the occurrence of any of the acts or omissions alleged by the Bureau in the notice, or assert that the amount of the proposed civil administrative penalty is excessive; and
 (d) a copy of the order or fine that is the subject of the request for review.

(4) The failure of a party to provide a specific description of the basis for the request for review in accordance with 205 CMR 101.032(3)(c) shall be grounds for dismissal of the request per the discretion of the hearing officer.

(5) Upon receipt, the clerk shall assign the request for review to a hearing officer and schedule the hearing. Mailing of notice to the address on record with the Commission, or emailing the notice to the email address provided by the licensee or registrant on their application for licensure or registration shall be deemed satisfactory notice. The notice of hearing shall contain:

- (a) The name of the petitioner; and
- (b) The date, time and place of the hearing.

(6) Any adjudicatory hearing conducted under 205 CMR 101.02 may be closed to the public at the request of either party in order to protect the privacy interests of either party or other individual, to protect proprietary technical information including, but not limited to, software, algorithms and trade secrets, or for other good cause shown. Any such request may be opposed by the other party. The final determination rests in the sole discretion of the hearing officer.

(7) (a) Upon receipt of the appeal, the hearing officer shall, within ten days, schedule a telephone status conference with all parties. During the status conference the hearing officer shall:

1. Address any argument that the proceeding should proceed under 801 CMR 1.01: *Formal Rules*;
2. Establish a briefing schedule including deadlines for the filing of the petitioner's brief and providing for a reasonable amount of time for the respondent to file a reply brief;
3. Establish deadlines for the filing of a witness list and exhibit list at reasonable amount of time before the hearing date;
4. Establish a briefing schedule with respect to any anticipated motions including deadlines for the filing of the movant's brief and providing for a reasonable amount of time for the respondent to file a reply brief; and
5. After completion of the status conference, the hearing officer shall issue a written order memorializing all deadlines and provide it to all parties.

(b) After the initial status conference, either party may file a brief explaining how they believe the matter should be decided including the specific relief requested. No late briefs shall be accepted without express permission of the hearing officer. No sur-reply briefs shall be accepted without express permission of the hearing officer. No brief shall be longer than 15 double-spaced pages without express permission of the hearing officer.

A party may request permission to file a brief longer than 15 pages. Such request shall be filed with the clerk who will forward it to the hearing officer for review. The request must be in writing and state the number of additional pages requested. It shall be up to the discretion of the hearing officer as to whether to grant such request. If the hearing officer grants a request for additional pages, the clerk shall forward the order of the hearing officer to all parties and all parties shall have the right to file such additional number of pages.

(8) With or without the submission of a brief, each party shall submit a copy of all written documentary evidence they intend to offer for consideration by the hearing officer as well as a list of all witnesses that the party intends to present at the hearing. The documentary evidence and witness lists shall be provided on or before the date determined by the Hearing Officer during the initial status conference. Failure to submit a brief shall not preclude a party from submitting written evidence or calling witnesses to be considered by the hearing officer. Upon request, the petitioner shall be provided an opportunity in advance of the hearing to examine and copy the entire content of their case file and all other documents to be used by the Commission, bureau, or racing division. All materials submitted to the clerk/hearing officer including, but not limited to, briefs, evidence and witnesses lists, shall be contemporaneously provided to the all other parties and their counsel *via* first-class mail or e-mail. Evidence or witnesses that are filed without providing reasonable notice to the opposing party may be precluded at the hearing officer's discretion.

101.02: continued

(9) All requests for extensions of time to file a brief or to reschedule a hearing date shall be made in writing and filed with the clerk. No request for extension of time to file a brief or to reschedule a hearing shall be considered, unless it is made at least seven days prior to the hearing date or briefing deadline. The clerk of the Commission may issue orders on procedural and scheduling matters consistent with M.G.L. c. 23K, and 205 CMR in order to further the efficient administration of the Commission's hearings process. The clerk may provide an extension of time to file a brief or reschedule a hearing date in the clerk's discretion and for good cause shown. The clerk shall send the order granting an extension of time to file a brief or the rescheduling of a hearing date to all parties. Any order shall include the number of days granted for the extension of time or the new date for the rescheduled hearing. Absent extenuating circumstances, no hearing shall be rescheduled more than once.

In the event of the appeal of a decision by the Racing judges or stewards, if the petitioner fails to appear at the hearing, the Hearing Officer, after determining that the petitioner received proper notice of the hearing, shall dismiss the matter. In the event of a matter before the hearing officer concerning an action taken by the bureau, the bureau may proceed with a hearing before the Hearing Officer, even in the absence of the petitioner, after determining that the petitioner received proper notice of the hearing.

(10) Hearings held before the hearing officer pursuant to 205 CMR 101.02 shall be adjudicatory proceedings conducted in accordance with M.G.L. c. 30A, §§ 10 and 11. All hearings shall be further held under 205 CMR 101.00, as applicable, and 801 CMR 1.02: *Informal/Fair Hearing Rules*, unless the applicant/petitioner makes a written request for a hearing under 801 CMR 1.01: *Formal Rules*. In that event the hearing officer shall determine, based on the facts and circumstances of the matter, whether 801 CMR 1.01 or 1.02 will apply in order to ensure a fair outcome. Such determination shall be based on such factors as the complexity of the issues presented, whether all parties are represented by counsel, and similar considerations. Conflicts between 801 CMR 1.01 or 1.02 and 205 CMR 101.00 shall be resolved in favor of 205 CMR 101.00. If the hearing officer grants a request that a hearing be held pursuant to 801 CMR 1.01, the provisions of 801 CMR 1.01 (1), (2), (3), (5), (6), (11) and (14) shall not apply.

(11)(a) There shall be no motions or formal discovery allowed in hearings under 205 CMR 101.02, unless upon the request of a party and for good cause shown, the hearing officer allows such motions or formal discovery request to be served. In the event that motions or formal discovery are allowed by the hearing officer, the hearing officer shall also set forth a reasonable schedule for responding to such motions or discovery requests.

(b) In the event that the hearing concerns an appeal from a decision of the Racing Judges involving a violation of 205 CMR 3.29, 205 CMR 101.02(11)(a) shall not apply and the formal discovery (beyond those documents submitted by the Racing Division in support of its decision) shall be limited to the production of the Laboratory Documentation package of the Commission approved laboratory. The Laboratory Documentation Package shall comply with industry best practices as established by the Racing Medication and Testing Consortium's Laboratory Accreditation Requirements and Operating Standards, Appendix C.

(12) A written transcript or electronic record of each hearing shall be created and all witnesses presenting testimony shall be sworn to testify under oath.

(13) In addition to the duties and powers of the hearing officer under 801 CMR 1.02(10)(f), the hearing officer shall make all factual and legal findings necessary to reach a decision, including evaluating the credibility of all witnesses and evidence presented. The hearing officer may ask questions of a party or a witness at the hearing. The hearing officer can request additional information from any party and may recess or continue the hearing to a later date. Any party to such a hearing shall be entitled to issue subpoenas as approved by the hearing officer in compliance with 205 CMR 101.02(11) and in accordance with M.G.L. c. 30A, § 12(3). The hearing officer may request a post-hearing brief from the parties and shall determine the page limit for such brief and the time by which it must be submitted. The parties may request leave of the hearing officer to submit a post-hearing brief as long as such a request is made within ten days of the hearing.

101.02 : continued

(14) The standard of review of an order or fine issued by the bureau or the racing division shall be the substantial evidence standard, unless a different standard is required by M.G.L. c. 23K or M.G.L. c. 128A or M.G.L. c. 128C. The hearing officer shall conduct a review of the matter, making findings of fact and conclusions of law to render a decision. The hearing officer shall affirm the order issued by the bureau or the racing division if there is substantial evidence to support it.

(15) The hearing officer shall issue a written decision as soon as administratively feasible after the close of the hearing. The written decision shall include findings of fact and conclusions of law and shall clearly state the basis for the hearing officer's decision. The hearing officer shall file its decision with the clerk. The decision of the hearing officer shall be the final decision of the Commission unless a request for appeal to the Commission is filed by a party to the proceeding within 30 days of the date of the hearing officer's decision. In the event of a timely filed appeal of a civil administrative penalty to the Commission, payment of any such penalty shall be stayed through the final decision by the Commission.

(16) The clerk shall send a copy of the decision to all parties and shall include with the decision a letter stating that a party may request appeal of the hearing officer's decision by the Commission and describing the process for requesting an appeal by the Commission.

(17) The hearing officer is authorized to certify any matter directly to the Commission. The exercise of such authority will generally be reserved for matters of first impression or those which present extraordinary or unique circumstances. Either party may also request that the hearing officer certify such a matter for Commission review. The Commission may accept and review the matter or may remand the matter to the hearing officer. In the event that the Commission accepts the matter, such hearings will be conducted in accordance with 205 CMR 101.02 in which the Commission will perform the hearing officer's functions. Appeals of such decisions may be taken in accordance with M.G.L. c. 30A in lieu of 205 CMR 101.03.

101.03 : Review by the Commission of Decisions of the Hearing Officer

(1) Any decision issued by a hearing officer in accordance with 205 CMR 101.02 may be appealed to the Commission for review. An appeal of the decision shall be filed with the clerk of the Commission on a form provided by the clerk. An appeal shall not operate as a stay of the decision of the hearing officer, unless specifically allowed by the Commission upon motion of the appellant. A request for a stay may be allowed at the Commission's discretion if one or both of the following two circumstances are present:

- (a) 1. there is a likelihood that the party seeking the stay will prevail on the merits of the case; and
- 2. there is a likelihood that the moving party will be harmed irreparably absent a stay.
- (b) 1. the consequences of the decision(s) to be made in the case are far-reaching;
- 2. the immediate impact upon the parties in a novel and complex case is substantial; or
- 3. a significant legal issue(s) is involved.

(2) In order to be considered by the Commission, the appeal must be filed no later than 30 days from the date the decision was served by the clerk in accordance with 205 CMR 101.02(16).

(3) The appeal shall include:

- (a) contact information of the party requesting the appeal;
- (b) of counsel representing the party requesting the appeal, if any;
- (c) a brief description of the basis for the appeal; and
- (d) a copy of the decision of the hearing officer that is the basis for the appeal.

(4) Upon receipt of the appeal by the Commission, the clerk shall docket the request and provide a copy of the administrative record to all parties involved in the matter to be reviewed by the Commission. The record may be provided electronically or *via* other similar means. The record shall include the decision of the hearing officer, any briefs submitted by the parties, the evidence submitted to the hearing officer and the transcript or audio recording of the adjudicatory hearing before the hearing officer. The record may only be expanded by the Commission upon petition by a party and a showing of good cause as to why the evidence was not included as part of the hearing record.

101.03: continued

(5) The clerk shall schedule a date for review by the Commission. The clerk shall request that each party file a brief stating why the decision of the hearing officer should be affirmed, vacated or modified and the relief requested. Issues not raised before the hearing officer shall not be raised in a brief to the Commission. The briefing schedule shall be set by the Commission and shall be staggered to provide the appellee adequate time to address the matters raised in the appellant's brief prior to the scheduled hearing before the Commission. No brief shall be longer than 15 pages. The briefs shall be filed with the clerk. Each party shall serve a copy of its brief on the other party(ies) to the hearing.

(6) The clerk shall provide copies of the briefs and a copy of the written record to the Commission.

(7) A party may request permission to file a brief longer than 15 pages. Such request must be in writing. The clerk shall forward the request to the Commission. It shall be up to the discretion of the Commission as to whether to grant such a request. If the Commission grants a request for additional pages, the clerk shall forward a copy of the Commission's order to all parties to the hearing and all parties shall have the right to file such additional number of pages. Requests to file a brief longer than 15 pages may be granted by an order issued by a single commissioner appointed by the chair~~man~~ to issue such orders.

(8) All requests for extensions of time to file a brief shall be made in writing to the clerk. The clerk shall forward the request for an extension of time to file a brief to the Commission. It shall be up to the discretion of the Commission as to whether to grant the request for an extension of time to file a brief. If the Commission grants the request for an extension of time to file a brief, the clerk shall forward a copy of the Commission's order to the parties and all parties shall have the extension of time to file a brief. Requests for an extension of time to file a brief may be granted by an order issued by a single commissioner appointed by the chair~~man~~ to issue such orders.

(9) The Commission's review of the decision of the hearing officer shall be on the administrative record of the hearing conducted by the hearing officer. The Commission, in its sole discretion and upon its own motion, may request oral argument on the request to review the decision of the hearing officer.

(10) When reviewing a decision from the hearing officer, the Commission's determination shall be supported by substantial evidence, unless a different standard is required by M.G.L. c. 23K or M.G.L. c. 128A or M.G.L. c. 128C.

(11) The Commission shall conduct a *de novo* review of the decision of the hearing officer based upon the administrative record, provided however, that findings made by the hearing officer regarding credibility of witnesses shall be entitled to substantial deference by the Commission. As provided by M.G.L. c. 30A, § 10, such appeal shall comply with M.G.L. c. 30A, § 11(8). The procedures described in M.G.L. c. 30A, § 11(7) shall only apply if, where applicable, a party makes written request to the Commission in advance for a tentative or proposed decision.

(12) The Commission may, in whole or part, affirm the decision of the hearing officer, reverse the decision of the hearing officer, modify the decision of the hearing officer or remand the matter to the hearing officer for further action in accordance with the Commission's decision. Further, the Commission may add any condition reasonably calculated to ensure a person's compliance or faithful performance, to penalize for the violations, and/or to deter future violation including, but not limited to, fines. In making its decision, the Commission may rely on any evidence contained in the administrative record and is not limited to the evidence cited by the hearing officer in support of hearing officer's decision.

(13) The Commission shall issue a written decision as soon as administratively feasible and file it with the clerk. The decision shall advise the parties of their rights to review in accordance with M.G.L. c. 23K and M.G.L. 30A, as applicable. The clerk will provide a copy of the Commission's decision to all parties.

205 CMR: MASSACHUSETTS GAMING COMMISSION

101.04: Informal Disposition of an Adjudicatory Proceeding

At any time during an adjudicatory proceeding before a hearing officer or the Commission, the parties may make informal disposition of any adjudicatory proceeding by stipulation, agreed settlement or consent order. Upon such a disposition, the parties are obligated to notify the hearing officer or Commission through a joint filing indicating that the matter has been resolved and that is signed by all parties and/or their representatives.

REGULATORY AUTHORITY

205 CMR 101.00: M.G.L. c. 7, § 4H; M.G.L. c. 23K, §§ 3(h); 4(15), (28), (29), (37); 5; 13; 17(f), (g); 30(g); 31; 35(g); 36(c), (d) and (f); and M.G.L. c. 30A.



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Amended Small Business Impact Statement in accordance with G.L. c. 30A, §5, relative to the proposed amendments to **205 CMR 101.00: M.G.L. c. 23K Adjudicatory Proceedings**. A public hearing was held on March 24, 2026, regarding the proposed regulation amendments. The amendments were developed as part of the process of promulgating regulations governing gaming in the Commonwealth.

The amendments apply directly to individuals or entities seeking a hearing before the Commission. Accordingly, the proposed amendments are not likely to have a negative impact on small businesses. The regulation amendments are authorized by G.L. c. 23K, § 4(28) and 4(29).

In accordance with G.L. c. 30A, §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

Presently, there are no less stringent compliance or reporting requirements for small businesses.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

The proposed amendments to this regulation do not impose any reporting requirements for small businesses.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

The proposed amendments to this regulation do not impose any consolidating or simplifying compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:

The proposed amendments do not establish performance standards for small businesses. This regulation utilizes operational standards to encourage uniformity in hearing and appeals process.



Massachusetts Gaming Commission

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

The regulation is not likely to adversely impact small businesses.

Massachusetts Gaming Commission

By:

/s/ Autumn Birarelli
Autumn Birarelli
Staff Attorney

Dated: April 9, 2026



Massachusetts Gaming Commission

134.07: continued

(5) Labor Organization Registration Statement. Each labor organization, union or affiliate seeking to represent employees who are employed at a gaming establishment shall register with the commission on a form to be created by the Bureau and submitted to the Division of Licensing. Such form shall contain, at a minimum, information to identify the officers, agents and/or principals of the organization and information to establish whether the organization and/or any of its officers, agents or principals hold any financial interest in a gaming establishment whose employees are represented by the organization.

(6) Subcontractor Information Form. A Subcontractor Information Form shall be created by the Bureau requesting any information as deemed necessary by the Bureau and submitted to the Division of Licensing.

134.08: Submission of Application

(1) An application, disclosure form, or registration for the initial issuance of a key gaming employee license in accordance with 205 CMR 134.01, a gaming employee license in accordance with 205 CMR 134.02, a gaming service employee registration in accordance with 205 CMR 134.03, a gaming vendor license in accordance with 205 CMR 134.04(1), a non-gaming vendor registration in accordance with 205 CMR 134.04(2), a Gaming-vendor qualifier disclosure form in accordance with 205 CMR 134.04(1)(c), and a Labor Organization registration statement in accordance with 205 CMR 134.05, shall include all of the following:

(a) A completed application form as follows:

1. An applicant for a key gaming employee-executive license shall file a Multi-jurisdictional Personal History Disclosure Form and a Massachusetts Supplement as set forth in 205 CMR 134.07(1)(a);
2. An applicant for a key gaming employee-standard license shall file a *Key Gaming Employee-standard Application Form* as set forth in 205 CMR 134.07(3);
3. An applicant for a gaming employee license shall file a Gaming Employee License Form as set forth in 205 CMR 134.07(1)(a);
4. A person seeking to register as a gaming service employee shall file a Gaming Service Employee Registration Form as set forth in 205 CMR 134.07(2)(a);
5. An applicant for a gaming vendorprimary license shall file a Business Entity Disclosure Form Gaming Vendor-primary as set forth in 205 CMR 134.07(3)(b);
6. An applicant for a Gaming Vendor-secondary license shall file a Business Entity Disclosure Form-gaming Vendor-secondary as set forth in 205 CMR 134.07(3)(b);
7. A person seeking to register as a non-gaming vendor shall file a Non-gaming Vendor Registration Form as set forth in 205 CMR 134.07(4)(a);
8. A gaming vendor-primary qualifier (individual) shall file a Key Gaming Employee standard Application Form as set forth in 205 CMR 134.07(2)(a) or in the alternative the individual may request authorization from the Bureau to file a Multi-jurisdictional Personal History Disclosure Form and a Massachusetts Supplement;
9. A gaming vendor-secondary qualifier (individual) shall file a Gaming Employee Application Form as set forth in 205 CMR 134.07(2)(a);
10. A gaming vendor-primary qualifier (entity) shall file a Business Entity Disclosure Form-gaming Vendor-primary as set forth in 205 CMR 134.07(3)(b);
11. A gaming vendor-secondary qualifier (entity) shall file a Business Entity Disclosure Form-gaming Vendor-secondary as set forth in 205 CMR 134.07(3)(b).
12. A Labor Organization shall file a Labor Organization Registration Statement as set forth in 205 CMR 134.07(5)(a);

(b) (For Gaming Employees and Gaming Service Employees) Proof of an offer of employment from a gaming licensee in the manner prescribed by the Division of Licensing. Ongoing employment with a gaming licensee is a prerequisite for an application for licensure or registration to remain a valid application not subject to administrative closure in accordance with 205 CMR 134.14(~~5~~2).

(c) (For Gaming Vendors-secondary and Non-gaming Vendors) Proof of vendor's business relationship with gaming licensee in the manner prescribed by the Division of Licensing.

134.08: continued

(2) Notwithstanding 205 CMR 134.08(1)(a), a qualifier for a gaming vendor license may, if authorized by the Bureau, file disclosure information including, but not limited to, for publicly traded companies, copies of their securities filings and/or audited consolidated financial statements for a period as determined by the Bureau, in *lieu* of the form identified in 205 CMR 134.08(1)(a).

(3) An applicant for a key gaming employee license who has previously been issued a positive determination of suitability by the commission as part of an RFA-1 investigation may file supplemental licensing information that updates their previous filing submitted as part of the qualifier suitability investigation as directed by the Division of Licensing in *lieu* of the full application identified in 205 CMR 134.08(1)(a).

(4) Each applicant shall file a complete application pursuant to 205 CMR 134.08(1) with the Division of Licensing in the manner prescribed by the Division of Licensing. The Division of Licensing shall not accept an incomplete application.

(5) Reciprocity for Vendors. If an applicant for a gaming vendor license or non-gaming vendor registration is licensed or registered in another jurisdiction within the United States with comparable license and registration requirements, as determined by the Bureau, and is in good standing in all jurisdictions in which it holds a license or registration, the commission may enter into a reciprocal agreement with the applicant, upon the recommendation of the Bureau, to allow for an abbreviated licensing or registration process and issue a gaming vendor license or registration in accordance with 205 CMR 134.00; provided, however, as part of any such an agreement that the commission shall reserve its rights to investigate the qualifications of an applicant at any time and may require the applicant to submit to a full application for a gaming vendor license or provide further information for registration. The reciprocal agreement shall identify the nature of the investigation to be conducted prior to issuance of the requested license or registration including, but not limited to, such *provisos* as the review of any investigatory reports from any jurisdictions in which the applicant is approved to conduct business, interviewing of any witnesses, and the filing of all required Massachusetts business filings.

(6) Scope of Duties. An employee of a gaming establishment may, where otherwise qualified, engage in the following duties without further licensure by the commission:

(a) A person who is licensed as a Key Gaming Employee-executive may, where otherwise qualified, engage in the performance of duties of a Key Gaming Employee-standard, gaming employee or gaming service employee.

(b) A person who is licensed as a Key Gaming Employee-standard may, where otherwise qualified, engage in the performance of duties of a gaming employee or gaming service employee.

(c) A person who is licensed as a gaming employee may engage in the performance of duties of a gaming service employee.

134.09: Investigation, Determination, and Appeals for Gaming Establishment Employees and Vendors

(1) Upon receipt of an application for a key gaming employee license in accordance with 205 CMR 134.01, a gaming employee license in accordance with 205 CMR 134.02, a gaming service employee registration in accordance with 205 CMR 134.03, a gaming vendor license in accordance with 205 CMR 134.04(1), a non-gaming vendor registration in accordance with 205 CMR 134.04(4), or the disclosure materials from a gaming vendor qualifier in accordance with 205 CMR 134.04(4), the Division of Licensing shall conduct a review of each for administrative completeness and then forward the application or submission to the Bureau which shall conduct an investigation of the applicant. In the event an application or submission is deemed incomplete, the Division of Licensing may either request supplemental information from the applicant or qualifier, or administratively close the application in accordance with 205 CMR 134.14. For individuals, the investigation shall include obtaining and reviewing criminal offender record information from the Department of Criminal Justice Information Services (DCJIS) and exchanging fingerprint data and criminal history with the Massachusetts Department of State Police and the United States Federal Bureau of Investigation. The investigation shall be conducted for purposes of determining whether the applicant is suitable to be issued a license or registration in accordance with 205 CMR 134.10 and 134.11.



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Amended Small Business Impact Statement in accordance with G.L. c. 30A, §5, relative to the proposed amendments to **205 CMR 134.00: *Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations***, specifically **205 CMR 134.08: *Submission of Application***. A public hearing was held on March 24, 2026, regarding the proposed regulation amendments. The amendments were developed as part of the process of promulgating regulations governing gaming in the Commonwealth.

The amendments apply directly to individuals and entities applying for licensure in accordance with G.L. c. 23K. Accordingly, the proposed amendments are not likely to have a negative impact on small businesses. This regulation amendment is authorized by G.L. c. 23K, § 5.

In accordance with G.L. c. 30A, §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

Presently, there are no less stringent compliance or reporting requirements for small businesses.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

The proposed amendments to this regulation do not impose any reporting requirements for small businesses.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

The proposed amendments to this regulation do not impose any consolidating or simplifying compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:



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The proposed amendment does not establish performance standards for small businesses. This regulation utilizes operational standards to encourage uniformity in the licensure process.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

The regulation is not likely to adversely impact small businesses.

Massachusetts Gaming Commission
By:

/s/ Autumn Birarelli
Autumn Birarelli
Staff Attorney

Dated: April 9, 2026



Massachusetts Gaming Commission

205 CMR: MASSACHUSETTS GAMING COMMISSION

238.30 : continued

- (8) Processes for submitting or receiving approval for Sports Wagering tournaments, contests, or pools;
- (9) Procedures for issuance and acceptance of promotional gaming credits for Sports Wagering; and
- (10) Procedures to identify a Wager or an attempt to Wager above any maximum Wager threshold set by the Sports Wagering Operator that qualifies as unusual or suspicious Wagering.

238.31 : In-Game or In-Play Wagering

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include procedures to assure and monitor the integrity of the in-game or in-play Wagering offering, the results handling and patron protection. Indicative areas for consideration in the procedure for results handling shall include, but not be limited to, time delays, sources of results, and reversal of results. The procedures shall also account for courtsiding prevention mechanisms including a delay in live pictures.

238.32 : Restricted Patrons

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall meet the requirements of 205 CMR 243.01(1)(t) and include the following in accordance with M.G.L. c. 23N, § 11(a):

- (1) No Sports Wagering Operator, directors, officers, owners, employees, subcontractors, or Qualifiers of the Sports Wagering Operator, as well as those within the same household as any such Person, may place Sports Wagers with the Sports Wagering Operator, or with any other Sports Wagering Operator tethered to the Operator, on any event, except in private pools where the player's association with the Sports Wagering Operator is clearly disclosed. Nor may such individual place Sports Wagers through another person as a proxy or agent. However, Sports Wagering Operator employees may use clearly marked test accounts for testing purposes such as evaluating a Sports Wagering Platform. Sports Wagering Operators shall make these restrictions known to all affected individuals and corporate entities.
- (2) No individual with proprietary or non-public information held by the Sports Wagering Operator may place Sports Wagers with the Sports Wagering Operator, or with any other Sports Wagering Operator tethered to the Operator. Nor may such individual place Sports Wagers through another person as a proxy or agent. Sports Wagering Operators shall make these restrictions known to all affected individuals and corporate entities.
- (3) No Sports Wagering Operator shall allow a professional or athlete, coach, referee, team owner, employee of a Sports Governing Body or its member teams and patron and referee union personnel, place Sports Wagers on events in the sport in which the individual participates, or in which the athlete the individual represents participates. Nor may such athlete, sports agent, team official, team representative, referee or league official place Wagers through another person as a proxy or agent. A Sports Wagering Operator may not be held liable for a violation of 205 CMR 238.32(3) if:
 - (a) The Sports Wagering Operator makes commercially reasonable efforts to obtain lists of such Persons for the purpose of implementing 205 CMR 238.32, such as by monitoring for and restricting accounts of such Persons;
 - (b) The Sports Wagering Operator makes these restrictions known to all affected individuals and corporate entities;
 - (c) The Sports Governing Body in which the athlete, sports agent, team official, team representative, referee or league official participates, maintains and enforces a policy that excludes such individuals from placing Wagers in that sport;
 - (d) The Commission has previously used the list of barred employees from the Sports Wagering Operator in accordance with M.G.L. c. 23N, § 11(a)(ii), and worked directly with a member team to determine the risk posed by certain employees for obtaining nonpublic information on a Sporting Event and removed an employee without knowledge of team strategy or game operations from such a list after the Commission determined any such risk is *de minimis*; and

205 CMR: MASSACHUSETTS GAMING COMMISSION

238.32 : continued

(e) The Sports Wagering Operator, upon learning of a violation of 205 CMR 238.4832(3), informs the Commission, immediately bars the individual committing the violation from Sports Wagering by suspending such individual's Sports Wagering Account and banning such individual from further Sports Wagering, terminates any existing promotional agreements with such individual and refuses to make any new promotional agreements that compensate such individual.

(4) The Sports Wagering Operator shall prevent persons from placing Sports Wagers as agents or proxies for others.

238.33 : Prohibited Persons

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include commercially reasonable methods to prevent a prohibited person from placing a Sports Wager.

(1) For the purposes of 205 CMR 238.33, a prohibited person refers to:

- (a) Any individual prohibited from Sports Wagering pursuant to 205 CMR 152.00: *Individuals Excluded from a Gaming Establishment*;
- (b) Any individual prohibited from Sports Wagering pursuant to 205 CMR 250.00: *Protection of Minors and Underage Youth from Sports Wagering*;
- (c) Any individual who is self-excluded from Sports Wagering pursuant to 205 CMR 233.00: *Sports Wagering Voluntary Self-exclusion*;
- (d) 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;
- (e) Any individual Wagering while not in the authorized geographic boundaries within the Commonwealth;
- (f) Any individual placing Sports Wagers as agents or proxies for others;
- (g) Any restricted patron Wagering in violation of their restrictions established in 205 CMR 238.32;
- (h) Any individual Wagering in violation of state, local or federal law; or
- (i) Other prohibited Persons as determined by the Commission.

(2) If a Sports Wagering Operator detects, or is notified of, an individual suspected of being a prohibited Person who has engaged or is engaging in prohibited Sports Wagering, the Sports Wagering Operator, shall use reasonable measures to verify whether the individual is prohibited or not.

(3) If the Sports Wagering Operator establishes, by reasonable measures, that the individual is prohibited, the Sports Wagering Operator shall cancel the individual's Sports Wager and confiscate any resulting funds.

(4) If the Sports Wagering Operator is unable to establish, by reasonable measures, that the individual is prohibited, then the individual is presumed to not be a prohibited Person for the purposes of 205 CMR 238.33.

238.34 : Layoff Wagers

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include procedures for a Sports Wagering Operator to accept layoff Wagers placed by other Sports Wagering Operators and place layoff Wagers with other Sports Wagering Operators for the purpose of offsetting patron Sports Wagers.

(1) The Sports Wagering Operator placing a layoff Wager shall inform the Sports Wagering Operator accepting the Wager that the Wager is being placed by a Sports Wagering Operator and shall disclose the Operator's identity pursuant to M.G.L. c. 23N, § 13(c).



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Amended Small Business Impact Statement in accordance with G.L. c. 30A, §5, relative to the proposed amendments to **205 CMR 238.00: *Additional Uniform Standards of Accounting Procedures and Internal Controls for Sports Wagering***, specifically **205 CMR 238.32: *Restricted Patrons***. A public hearing was held on March 24, 2026, regarding the proposed regulation amendment. The amendment was developed as part of the process of promulgating regulations governing sports wagering in the Commonwealth.

The amendment applies to individuals restricted from sports wagering in the Commonwealth. Accordingly, the proposed amendment is not likely to have a negative impact on small businesses. This regulation amendment is authorized by G.L. c. 23N, §§ 4 and 11(a).

In accordance with G.L. c. 30A, §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

Presently, there are no less stringent compliance or reporting requirements for small businesses.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

The proposed amendments to this regulation do not impose any reporting requirements for small businesses.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

The proposed amendments to this regulation do not impose any consolidating or simplifying compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:

The proposed amendment does not establish performance standards for small businesses. This regulation utilizes operational standards to encourage uniformity in statutory compliance.



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5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

The regulation is not likely to adversely impact small businesses.

Massachusetts Gaming Commission
By:

/s/ Autumn Birarelli
Autumn Birarelli
Staff Attorney

Dated: April 9, 2026



Massachusetts Gaming Commission



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

From: Autumn Birarelli, Staff Attorney

Cc: Kevin Scanlon, General Counsel
Jenna Hentoff, Deputy General Counsel

Re: 205 CMR 248.12: Account Withdrawals

Date: April 9, 2026

Introduction

Enclosed for the Commission's consideration is the proposed draft of **205 CMR 248.12: Account Withdrawals**. The proposed amendment is scheduled to come forward at the April 9, 2026, public meeting for initial presentation and a request for a vote of approval to start the promulgation process. This regulation amendment is authorized by G.L. c. 23N, § 4.

Discussion

[G.L. c. 23N, § 4\(d\)](#) requires that the Commission promulgate regulations regarding patron protections. One of the requirements, set forth in G.L. c. 23N, § 4(d)(2)(vi), is that operators must "allow a consumer to withdraw funds without further solicitation or promotion in the manner in which the funds were deposited." This requirement is captured in the Commission's regulations at [205 CMR 248.12](#), which governs sports wagering account withdrawals.

However, it is not always technologically feasible to return funds in the manner in which they were deposited. For example, if the bank account used to deposit funds into a sports wagering account was later closed, then funds could not be withdrawn into the closed bank account. The proposed amendment to 205 CMR 248.12 would require operators to pay the patrons' withdrawal via check if it is not technologically feasible to pay the funds in the manner in which they were deposited.



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248.10 : continued

(6) For debit cards and EFTs, the patron may be liable for any charges imposed by the transmitting or receiving Sports Wagering Operator. Such charges may be deducted from the patron's Sports Wagering Account.

248.11 : Failed Electronic Funds Transfers (EFTs)

(1) The Sports Wagering Operator shall have security measures and controls to prevent EFT fraud where financial transactions are conducted through EFT. A failed EFT attempt is not considered fraudulent if the patron has successfully performed an EFT on a previous occasion and has no outstanding chargebacks. Otherwise, the Sports Wagering Operator shall:

(a) Temporarily block the patron's Sports Wagering Account for investigation of fraud after five consecutive failed EFT attempts within a ten-minute period. If there is no evidence of fraud, the block may be vacated; and

(b) Suspend the patron's Sports Wagering Account after five additional consecutive failed EFT attempts within any subsequent ten-minute period.

248.12 : Account Withdrawals

(1) The Sports Wagering Operator shall implement procedures that:

(a) Prevent unauthorized withdrawals from Sports Wagering Accounts by the Sports Wagering Operator or others;

(b) Establish a protocol by which patrons can withdraw funds maintained in their Sports Wagering Accounts, whether such accounts are open or closed, except as otherwise provided in 205 CMR, or any other applicable state, local or federal law.

(2) Pursuant to M.G.L. c. 23N, § 4(d)(2)(vi), a patron must be allowed to withdraw the funds maintained in his or her Sports Wagering Account, without further solicitation or promotion in the manner in which the funds were deposited, **to the extent technologically feasible. In the event that withdrawal of the funds in the same manner in which the funds were deposited is not technologically feasible they shall be returned to the patron via check.**

Upon a request from a patron to withdraw funds from their Sports Wagering Account, the Sports Wagering Operator shall immediately freeze the amount requested and ensure the funds cannot be used for any other purpose until the withdrawal is complete.

(3) A Sports Wagering Operator must employ a mechanism that can detect and prevent any withdrawal activity initiated by a patron that would result in a negative balance of the Sports Wagering Account.

(4) A Sports Wagering Operator shall not allow a Sports Wagering Account to be overdrawn unless caused by payment processing issues outside the control of the Sports Wagering Operator.

(5) Except as otherwise provided in 205 CMR 248.12(5)(a), requests for withdrawals must be honored by the later of five business days of the request or ten business days of submission of any tax reporting paperwork required by law.

(a) If the Sports Wagering Operator believes in good faith that the patron engaged in either fraudulent conduct or other conduct that violate or would put the Sports Wagering Operator in violation of 205 CMR, the Sports Wagering Operator may decline to honor the request for withdrawal for a reasonable investigatory period until its investigation is resolved if it provides notice of the nature of the investigation to the patron.

(b) For purposes of the timing requirements of 205 CMR 248.12(5), a request for withdrawal will be considered honored if it is processed by the Sports Wagering Operator but delayed by a payment processor, debit card issuer or by the custodian of a financial account.

(6) The Sports Wagering Operator shall not be liable for any unauthorized withdrawal of funds from a Sports Wagering Account where such unauthorized withdrawal is not caused by the negligence or misconduct of the Sports Wagering Operator. It is the patron's responsibility to protect deposits in the account by keeping their authentication credentials strictly confidential.



SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2, relative to the proposed amendment to **205 CMR 248.00: Sports Wagering Account Management**, specifically **205 CMR 248.12: Account Withdrawals**. The regulation amendment is authorized by MGL c. 23N, § 4.

This regulation is being promulgated as part of the process of updating regulations governing sports wagering in the Commonwealth. It sets forth the account management requirements regarding account withdrawals.

The proposed amendment to 205 CMR 248.12 applies to entities licensed by the Commission under G.L. c. 23N. Accordingly, this regulation is unlikely to have an impact on small businesses. Under G.L. c. 30A, §2, the Commission offers the following responses to the statutory questions:

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

Small businesses are unlikely to be subject to this regulation.

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

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

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

The standards set forth are design standards to encourage uniformity.

4. Identify regulations of the promulgating agency, or of another agency or department of the Commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.

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



Massachusetts Gaming Commission

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

Massachusetts Gaming Commission
By:

/s/ Autumn Birarelli
Autumn Birarelli, Staff Attorney

Dated: April 9, 2026



Massachusetts Gaming Commission



Legal Division

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

FROM: Jenna Hentoff, Deputy General Counsel
Caitlin Monahan, Director of the Investigations and Enforcement Bureau
Burke Cain, Gaming Agents Division Chief
Dave DiOrio, Gaming Agents Division Assistant Chief and Casino Compliance Coordinator

RE: Proposed amendments to 205 CMR 138.69: *Entertainment, Filming or Photography within the Gaming Area*

DATE: April 9, 2026

Overview:

Enclosed for the Commission's review is a proposed draft of 205 CMR 138.69 which governs activities involving entertainment, filming or photography within the gaming area. The Legal Division is seeking approval to begin the promulgation process.

While various sections within 205 CMR 138, which governs the requirements for uniform standards of accounting procedures and internal controls related to gaming, have been amended since its first promulgation, this particular section has not been substantively reviewed by the Commission since its adoption. As the capacity to both engage in these activities and disseminate the results to the wider public, particularly with regard to filming and photography, has evolved since the first casino opened more than ten years ago, the Legal Division, in collaboration with the Investigations and Enforcement Bureau ("IEB"), has conducted a review of 205 CMR 138.69 based upon a request from the gaming licensees and are proposing amendments to better reflect this evolving landscape which address the needs of the gaming licensees while also maintaining appropriate oversight.

Discussion:

205 CMR 138.69 was originally promulgated in June 2015, just prior to the opening of the first casino in Massachusetts. Currently, this regulation does not allow the gaming licensee to engage in entertainment, filming or photography on the gaming floor, or within visible or audible range of the gaming floor, unless notice is provided to the IEB at least 24 hours prior to the activity. The regulation outlines what the notice to the IEB must include, provides factors that the IEB



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must consider in determining whether to permit the activity, and allows the IEB to require the gaming licensee to immediately cease the activity if there are any discrepancies between the submission and materials provided or if it compromises the security and integrity of gaming operations.

The proposed changes to 205 CMR 138.69 seek to update these provisions to permit the gaming licensee to engage in or permit a wider range of activities involving entertainment, filming or photography, if such is outlined in their internal controls and approved by the IEB and Executive Director, while requiring the imposition of a series of limitations intended to protect patrons and uphold the integrity of gaming operations. A summary of the proposed changes includes the following:

- The gaming licensee must submit a plan as part of its internal controls under which they may allow covered activities for the purposes of advertising, marketing and promotion, general entertainment or news stories or in the event of an emergency in which the licensee wishes to memorialize the emergency event.
- Covered activities may be engaged in by licensed or registered employees or vendors of the gaming licensee with notice given to the IEB at least 24 hours prior to the activity or within 24 hours of an emergency event.
- Covered activities may be engaged in by patrons of the gaming establishment based on receipt by the gaming licensee of a written request from the patron and with notice to the IEB at least 5 days prior to the patron's activity. Further, if the gaming licensee proposes to allow the patron's request, the gaming licensee must provide information to the patron about any applicable statutes or regulations, including 205 CMR 138.69.
- Any covered activities must be subject to a series of limitations intended to protect casino patrons and to ensure the integrity of gaming operations throughout the establishment. Limitations include not allowing activities that infringe on patron privacy or gaming operations or that involve active table games, live streaming, panoramic shots of the gaming floor, restricted areas, proxy wagering or individuals who appear under the influence. Further, the gaming licensee must provide an escort to any news media or patrons engaged in covered activities. Gaming licensees may submit a written request to the IEB to waive some of the limitations outlined in the proposed amendments. As limited time between receipt of a waiver request and the date of the activity is anticipated, it is proposed that the IEB will review waivers in accordance with the provisions of 205 CMR 102.03(4)(a).

- In addition to current requirements, the written notice to the IEB must also include the following:
 - The gaming licensee must disclose its relationship with the individuals involved in any covered activities, including whether the individuals will be receiving any compensation or thing of value in connection with this relationship.
 - Those involved in any covered activities must sign an attestation that they will comply with several requirements, including limitations imposed by the gaming licensee and the regulatory prohibition on firearms. Regarding the content of any resulting filming or photography, they must also attest that it will not contain any false or misleading claims that portray gambling as a way to solve problems, achieve success, or encourage continued play as well as that it will not be directed at individuals under the age of 21, such as by featuring individuals or using imagery or language that would appeal to such individuals or by posting it to an audience reasonably known to be under 21 years old.
- Covered activities must also comply with any other applicable regulations such as those that relate to the Voluntary Self-Exclusion List, minors and underage youth, and advertising.
- The gaming licensee must post a notice notifying patrons that covered activities may be occurring on the floor.

205 CMR 138.00: UNIFORM STANDARDS OF ACCOUNTING PROCEDURES AND INTERNAL CONTROLS

138.69: Entertainment, Filming or Photography within the Gaming Area

(1) ~~No~~ The system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include a plan under which a gaming licensee may permit entertainment, filming or photography ~~shall be if it is~~ offered or conducted within the gaming area, or ~~shall be~~ is significantly visible or audible from or in the gaming area. Entertainment, filming or photography may be permitted by the gaming licensee to advertise, market or promote the gaming establishment, for general entertainment purposes, or for the reporting of news stories. Filming or photography may also be permitted in the event of an emergency in which filming or photography is necessary to memorialize the emergency event for the purpose of maintaining the facility or gaming equipment.

(2) The gaming licensee may permit employees or vendors licensed or registered pursuant to 205 CMR 134.00 or news media, including television, radio, newspaper, internet or other similar outlets, to engage in entertainment, filming or photography under the plan submitted pursuant to 205 CMR 138.69(1). ~~, unless~~ ~~†~~The gaming licensee shall file a written notice with the IEB, at least 24 hours prior to the commencement of such entertainment, filming or photography that meets the requirements of 205 CMR 138.69(6). In the event of an emergency as described in 205 CMR 138.69(1), the gaming licensee shall file a written notice with the IEB within 24 hours of the emergency which includes a description of the emergency and any related filming or photography.

(3) The gaming licensee may permit patrons to engage in filming or photography under the plan submitted by the gaming licensee pursuant to 205 CMR 138.69(1) upon the patron's written request. If the gaming licensee proposes to allow the patron's request, the gaming licensee shall comply with the following:

- (a) File a written notice with the IEB at least five (5) days prior to such filming or photography which meets the requirements of 138.69(6); and
- (b) Provide information to the patron about any applicable statutes or regulations, including but not limited to 205 CMR 138.69 and those referenced therein.

(4) Any entertainment, filming or photography offered or permitted by the gaming licensee shall be subject to the following limitations:

- (a) The gaming licensee shall not permit entertainment, filming or photography that infringes upon the privacy of others or which adversely affects the security or integrity of gaming operations. To the extent possible, only the individuals whose participation is outlined in the notice submitted to the IEB should be captured on film or in photographs;
- (b) The gaming licensee shall not permit table games in operation to be involved in entertainment or shown on film or in photographs. This includes the table, equipment, chips, cards, dice, dealer actions, or patron activities;
- (c) The gaming licensee shall not permit the real-time or near real-time transmission of audio or visual content (ie. live streaming) via television, internet platforms, social media,

or other digital or electronic methods;

(d) The gaming licensee shall not permit filming or photography that utilizes panoramic or wide-angle shots which encompass a broad view of the gaming floor;

(e) The gaming licensee shall not permit news media or patrons to film or photograph or be permitted in secure or restricted areas, including the cashier's cage, the surveillance or operations center, count rooms, back of house area, surveillance camera configurations, and any other location where sensitive security or operational equipment is contained;

(f) The gaming licensee shall not permit the placing of a wager on behalf of another individual, whether present at the gaming establishment or remote, at the individual's direction or using the individual's funds to be involved in entertainment or captured on film or in photographs;

(g) The gaming licensee shall not permit individuals who appear intoxicated or are otherwise under the influence of alcohol or drugs to participate in or be shown in any entertainment, film or photography; and

(h) The gaming licensee shall designate one or more employees to accompany and supervise any filming or photography by news media or patrons.

(5) The gaming licensee may request a waiver of the limitations outlined in 205 CMR 138.69(4)(a) – (e). Such waiver request must be submitted in writing to the IEB along with the notice required by 205 CMR 138.69(6). The IEB shall review any waiver request in accordance with the provisions of 205 CMR 102.03(4)(a).

~~(4)~~(6) , whichThe written notice required by 205 CMR 138.69(2) and (3) shall include, at a minimum, the following information:

(a) The date and time of the scheduled entertainment, filming or photography;

(b) A detailed description of the type of entertainment, filming or photography to be offered, including the location, website or platform where any filming or photography will be broadcast or posted;

(c) The number and names of persons involved in the entertainment, filming or photography;

~~(e)~~(d) A description of the relationship between the gaming licensee and the individuals involved in the entertainment, filming or photography, including but not limited to any compensation or thing of value received by said individuals in connection with the relationship;

~~(d)~~(e) The exact location of the entertainment, filming or photography in the gaming area;

~~(e)~~(f) A description of any additional security measures that will be implemented as a result of the entertainment, filming or photography; ~~and~~

(g) A certification from the supervisors of the gaming licensee's security, gaming operations, and surveillance departments that the proposed entertainment, filming or photography will not adversely affect the security and integrity of gaming operations; and

(h) An attestation from the individuals involved in the entertainment, filming or photography that they will comply with the following:

1. All limitations, restrictions or prohibitions imposed by the gaming licensee, including but not limited to the limitations outlined in 205 CMR 138.69(4);

2. Prohibitions against firearm possession on the premises as required pursuant to 205 CMR 138.20;

3. Any filming or photography produced will contain no false or misleading claims, including but not limited to, claims that achieve the following:

- a. Encourage players to chase losses or reinvest winnings;
 - b. Suggest that gambling is a means of solving financial, personal or professional problems or a way to pay bills;
 - c. Guarantee winning or financial, social or personal success;
 - d. Imply that the chance of winning increases the longer one plays or the more one spends;
 - e. Suggest that skill can influence the outcome of a game in which skill is not a significant factor; and
 - f. Suggest that the odds of winning or losing any games offered by the gaming licensee is different from the actual odds; and
4. Any filming or photography produced will not be directed at individuals under the age of 21, such as by engaging in the following:
- a. Featuring anyone who is, or appears to be, under the age of 21;
 - b. Using imagery, language, symbols, themes, role models and/or celebrity endorsers that primarily appeal to those under the age of 21;
 - c. Suggesting that gambling is a rite of passage to adulthood; and
 - d. Broadcasting, placing or posting the final product before an audience which is reasonably known to be predominantly under the age of 21.

(7) Upon receipt and review of the notice described in 205 CMR 138.69, the IEB may deny the proposed entertainment, filming or photography, request additional information, or require modifications. In reviewing the suitability of proposed entertainment, filming or photography, the IEB shall consider the extent to which the proposed entertainment, filming or photography may unduly disrupt or interfere with:

- (a) Efficient gaming operations;
- (b) The security of the gaming establishment or any portion thereof;
- (c) Surveillance operations;
- (d) The security or integrity of gaming operations or any authorized game; or
- (e) Patron safety.

(8) The IEB may at any time require the gaming licensee to immediately cease any entertainment, filming or photography offered within the gaming area; if the entertainment, filming or photography provided deviates in any material is in any manner different from the description contained in the submission filed pursuant to 205 CMR 138.69(1) way from the gaming licensee's approved plan or notice submitted to the IEB or in any way compromises efficient gaming operations, the security of the gaming establishment or any portion thereof, surveillance operations, the security or integrity of gaming operations or any authorized game, or patron safety.

(9) Any entertainment, filming or photography offered pursuant to the gaming licensee's approved plan shall comply with all applicable regulations, including but not limited to, 205 CMR 133.00: *Voluntary Self-Exclusion*; 205 CMR 150.00: *Protection of Minors and Underage Youth*; and 205 CMR 256.00: *Sports Wagering Advertising*.

(2)(10) The gaming licensee shall post a notice in a conspicuous location at each entrance to the gaming establishment that notifies patrons that filming or photography may be taking place

on the gaming floor and that their continued presence on the gaming floor constitutes consent to being captured on film or in photographs.

~~(3) In reviewing the initial or continued suitability of an entertainment, filming or photography proposal, the IEB shall consider the extent to which the entertainment, filming or photography proposal may unduly disrupt or interfere with:~~

- ~~(a) Efficient gaming operations;~~
- ~~(b) The security of the gaming establishment or any portion thereof;~~
- ~~(c) Surveillance operations; or~~
- ~~(d) The security or integrity of gaming operations or any authorized game.~~



Legal Division

SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2 relative to the proposed amendments to **205 CMR 138: Uniform Standards of Accounting Procedures and Internal Controls, specifically 205 CMR 138.69: Entertainment, Filming or Photography within the Gaming Area**. This regulation was developed as part of the process of promulgating regulations governing gaming in the Commonwealth. The amendments to the regulation govern the ability of gaming establishments to engage in or permit entertainment, filming and photography in the gaming area. The regulation amendments are authorized by G.L. c. 23K, §§ 4(28) and 25(d).

The regulation amendments apply directly to licensed gaming establishments in the Commonwealth. Accordingly, these proposed amendments are not likely to have an impact on small businesses. In accordance with G.L. c. 30A, § 2, the Commission offers the following responses:

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

While the amendments to this regulation will allow a gaming licensee to permit an individual, who may be operating as a small business, to engage in the covered activities, the gaming licensee is specifically governed by and required to comply with this regulation. Therefore, there are no small businesses that would be directly impacted by the amendments to this regulation.

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

There are no projected reporting, recordkeeping and other administrative costs created by the amendments to this regulation that would affect small businesses.

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

The amendments to this regulation utilize performance standards to ensure licensee compliance with the requirements outlined in the regulation.

4. Identify regulations of the promulgating agency, or of another agency or department of the commonwealth, which may duplicate or conflict with the proposed regulation:



Massachusetts Gaming Commission

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.

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

The amendments to this regulation are unlikely to deter or encourage the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

/s/ Jenna Hentoff
Jenna Hentoff
Deputy General Counsel

Dated: April 9, 2026



Massachusetts Gaming Commission



Legal Division

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

FROM: Jenna Hentoff, Deputy General Counsel
Burke Cain, Gaming Agents Division Chief
Dave DiOrio, Gaming Agents Division Assistant Chief
Luis Lozano, Casino Regulatory Manager, Encore Boston Harbor
Marty Edwards, Assistant Casino Regulatory Manager, Encore Boston Harbor
Natalia Villareal, Casino Regulatory Manager, MGM Springfield

RE: Update to Blackjack Table Game Rules

DATE: April 9, 2026

Upon review of the current table games rules for Blackjack, it was discovered that a payable for the TriLux Bonus optional side bet is missing from the authorized rules of the game. This payable has been added into the rules which will allow the gaming licensees to fully offer the already approved wager. In addition, page numbers have been added for ease of use.

The IEB and Legal Division are seeking the Commission's approval of this updated version of the authorized rules of Blackjack.



Massachusetts Gaming Commission

BLACKJACK

Rules

1. Definitions

The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise.

Blackjack - shall mean an ace and any card having a point value of 10 dealt as the initial two cards to a player or a dealer except that this shall not include an ace and a ten point value card dealt to a player who has split pairs.

Card Reader - Device is defined in equipment section (7) above.

Dealer - shall mean the person responsible for dealing the cards at a Blackjack table.

Hard Total - shall mean the total point count of a hand which contains no aces or which contains aces that are each counted as 1 in value.

Pat hand - shall mean a hand that has a value of hard 17 or better and does not require a hit.

Soft Total - shall mean the total point count of a hand containing an ace when the ace is counted as 11 in value.

2. Cards; number of decks; value of cards

- (a) Blackjack shall be played with at least one deck of cards. All decks of cards used to play blackjack shall comply with the requirements of the gaming equipment regulations and, except as otherwise provided in this section, all decks of cards shall be identical in appearance. Blackjack shall also be played with one additional cut card which shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards in use at the table, as approved by the Commission. Notwithstanding the foregoing, the minimum number of decks used to play blackjack shall be:
- (1) Two, if the twenty point bonus wager authorized by Section 24 is offered;
 - (2) Four, if the additional wager authorized by Section 17(a)(3) or the '*progressive blackjack wager*' authorized by Section 19 is offered; or
 - (3) Six or eight, if the Match-the-Dealer wager authorized by Section 23 or the optional bonus wager authorized by Section 25 is offered.
- (b) The value of the cards contained in each deck shall be as follows:
- (1) Any card from 2 to 10 shall have its face value;
 - (2) Any Jack, Queen or King shall have a value of ten;
 - (3) An ace shall have a value of:

- (i) Eleven, unless that value would give a player or the dealer a score in excess of 21, in which case, it shall have a value of one; or
 - (ii) One, if the ace is one of the initial two cards dealt to a player in determination of the additional wager authorized by Section 17(a)(1); provided, however, that the value of such ace for all other purposes under this section shall be governed by (b)(3)(i) above.
- (c) If an automated card shuffling device is utilized, blackjack shall be played with at least two decks of cards in accordance with the following requirements:
- (1) The cards shall be separated into two batches, with an equal number of decks included in each batch;
 - (2) The cards in each batch shall be identical in appearance, but the backs of the cards in each batch shall be of a different color than the cards included in the other batch;
 - (3) One batch of cards shall be shuffled and stored in the automated card shuffling device while the other batch is being dealt or used to play the game;
 - (4) Both batches of cards shall be continuously alternated in and out of play, with each batch being used for every other dealing shoe; and
 - (5) The cards from only one batch shall be placed in the discard rack at any given time.

3. Wagers

- (a) Prior to the first card being dealt for each round of play, each player at the game of blackjack shall make a wager against the dealer which shall win if:
 - (1) The score of the player is 21 or less and the score of the dealer is in excess of 21;
 - (2) The score of the player exceeds that of the dealer without either exceeding 21; or
 - (3) The player has achieved a score of 21 in two cards and the dealer has achieved a score of 21 in more than two cards.
- (b) Except as otherwise provided in Section 2(a)(2) above, a wager made in accordance with this section shall be void when the score of the player is the same as the dealer provided, however, that a player's wager shall be lost when the dealer has a blackjack and the player has a simple 21 which is not a blackjack.
- (c) Except as otherwise provided in this Section, no wager shall be made, increased or withdrawn after the first card of the respective round has been dealt.
- (d) All wagers at blackjack shall be made by placing gaming chips or plaques and, if applicable, a match play coupon on the appropriate areas of the blackjack layout, except that verbal wagers accompanied by cash may be accepted provided that they are confirmed by the dealer and casino supervisor and that such cash is expeditiously converted into gaming chips or plaques in accordance with the internal control regulations.
- (e) After each round of play is complete, the dealer shall collect all losing wagers and pay off all winning wagers. All winning wagers made in accordance with (a) above shall be paid at odds of 1 to 1 with the exception of standard blackjack which shall be paid at odds of 3 to 2, or at odds of 6 to 5. Notwithstanding any other provision of this subsection, a gaming

licensee may, in its discretion, offer one or more of the following payout odds for winning wagers made in accordance with (a) above, provided that the gaming licensee complies with the notice requirements set forth in 205 CMR 147.03:

- (1) Three cards consisting of the 6, 7 and 8 of the same suit shall be paid at odds of 2 to 1;
 - (2) Three cards consisting of three 7's of any suit shall be paid at odds of 3 to 2; and/or
 - (3) A single blackjack combination consisting of a specific ace and face card designated by the gaming licensee in accordance with 205 CMR 147.03 shall be paid at odds of 2 to 1;
 - (4) Five cards totaling 21 shall be paid at odds of 2 to 1.
- (f) Once the first card of any hand has been removed from the shoe by the dealer, no player shall handle, remove or alter any wagers that have been made until a decision has been rendered and implemented with respect to that wager except as explicitly permitted by these regulations.
- (g) Once a wager on the insurance line, a wager to double down or a wager to split pairs has been made and confirmed by the dealer, no player shall handle, remove or alter such wagers until a decision has been rendered and implemented with respect to that wager except as explicitly permitted by this Section.
- (h) No dealer or other gaming employee shall permit any player to engage in conduct that violates Section 3(f) or (g).
- (i) After the cards have been shuffled pursuant to Section 5, a gaming licensee may, in its discretion, prohibit any person, whether seated at the gaming table or not, who does not make a wager on a given round of play from placing a wager on the next round of play and any subsequent round of play at that gaming table unless the gaming licensee chooses to permit the player to begin wagering or until a reshuffle of the cards has occurred.
- (j) Notwithstanding any other provision of this section to the contrary, a player may, in accordance with Section 19, make a supplemental '*progressive blackjack wager*' at any blackjack table where that wager is offered either by depositing a \$1.00 gaming chip onto the acceptor device designated for that player or by redeeming a progressive wager coupon in accordance with the provisions of internal control regulations.

4. Opening of table for gaming

- (a) After receiving the one or more decks of cards at the table in accordance with the gaming equipment regulations, the dealer shall, as applicable, comply with the requirements of 205 CMR 146.
- (b) After the cards are inspected, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. The cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence. The cards in each suit shall be laid out in sequence within the suit.

- (c) After the first player or players is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table, mixed thoroughly by a "washing" or a "chemmy shuffle" of the cards and stacked.
- (d) If an automated shuffling device is utilized, all the decks in one batch of cards shall be spread for inspection on the table separate from the decks in the other batch of cards. After the player or players is afforded an opportunity to visually inspect the cards, each batch of cards shall separately be turned face downward on the table and stacked.

5. Shuffle and cut of the cards

- (a) Immediately prior to commencement of play, unless the cards were pre-shuffled pursuant to the gaming equipment regulations, after any round of play as may be determined by the gaming licensee and after each shoe of cards is dealt, the dealer shall shuffle the cards so that they are randomly intermixed.
- (b) After the cards have been shuffled, the dealer shall perform one of the following options. The dealer will offer the stack of cards, with backs facing away from them to the players to be cut, or at the casino's discretion, the dealer will cut the stack of cards for the table.
- (c) The player designated by subsection (e) of this section shall cut the cards by placing the cut card in the stack at least a deck in from either end.
- (d) Once the cut card has been inserted by the player or dealer, the dealer shall take all cards in front of the cut card and place them to the back of the stack. The dealer shall then take the entire stack of cards that was just shuffled and align them along the side of the dealing shoe which has the mark required by the gaming equipment regulations. Thereafter, the dealer shall insert the cut card in the stack at a position at least approximately one-quarter of the way in from the back of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play.
- (e) The player to cut the cards shall be:
 - (1) The first player to the table if the game is just beginning;
 - (2) The player on whose box the cut card appeared during the last round of play;
 - (3) The player at the farthest point to the right of the dealer if the cut card appeared on the dealer's hand during the last round of play.
 - (4) The player at the farthest point to the right of the dealer if the reshuffle was initiated at the discretion of the gaming licensee.
- (f) If the player designated in subsection (e) of this section refuses the cut, the cards shall be offered to each other player moving counterclockwise around the table until a player accepts the cut. If no player accepts the cut, the dealer shall cut the cards.
- (g) After the cards have been cut and before any cards have been dealt, a casino supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the

cards shall be recut, at the gaming licensee's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by section (f) above.

- (h) A reshuffle of the cards in the shoe shall take place after the cut card is reached in the shoe as provided for in Section 6(k) except that, the gaming licensee may determine after each round of play that the cards should be reshuffled.
- (i) If there is no gaming activity at a blackjack table which is open for gaming, the cards shall be removed from the dealing shoe and the discard rack and spread out on the table for inspection.
 - (1) If there is no automated shuffling device in use, the cards shall be mixed thoroughly by a washing or chemmy shuffle of the cards, stacked, then shuffled and cut in accordance with this section.
 - (2) If an automated shuffling device is in use, the cards shall be stacked and placed into the automated shuffling device to be shuffled. The batch of cards already in the shuffler shall then be removed. Unless a player so requests, the batch of cards removed from the shuffler need not be spread for inspection and reshuffled prior to being dealt, if:
 - (i) The automated card shuffling device stores a single batch of shuffled cards inside the shuffler in a secure manner approved by the Commission; and
 - (ii) The shuffled cards have been secured, released, and prepared for play in accordance with procedures approved by the Commission.
- (j) A gaming licensee may submit to the IEB for approval proposed shuffle, cut card placement, number of cut cards (to include shuffle techniques without the use of any cut cards), location of where the shuffle takes place, who is responsible for shuffling, shuffling equipment (dealing shoes or other dealing devices) and burn card procedures.
- (k) When the licensee is using a manual shuffle, the following steps will be incorporated into their shuffle procedure.
 - (1) The “plug” is a method for inserting unused cards from behind the cut card into the cards in the discard tray. This is usually the first step.
 - (2) The “riffle” is when the cards are divided into two piles and interlaced.
 - (3) The “turn” involves dividing the shoe into two stacks and rotating one stack 180 degrees before riffling the stacks together.
 - (4) The “strip” also known as running cuts. The strip should not occur before at least two riffles have taken place.
 - (5) The “cut” is the final step before the cards are put back into the shoe. This ensures that the top card cannot be identified if it was accidentally exposed during the other steps.

6. Procedure for dealing of cards

- (a) All cards used to game at blackjack shall be dealt from a dealing shoe specifically designed for such purpose.

- (b) Each dealer shall remove cards from the shoe with his left hand, turn them face upwards, and then place them on the appropriate area of the layout with his right hand, except that the dealer has the option to deal hit cards to the first two positions with their left hand. Cards will be dealt so as not to expose the hole card or any other face down cards in a manner that cannot be readily observed by someone attempting to ascertain their value.
- (c) After each full set of cards is placed in the shoe, the dealer shall remove the first card there from face downwards and place it in the discard rack. Each new dealer who comes to the table shall also burn one card as described herein before the new dealer deals any cards to the players. Each gaming licensee may, at its discretion, offer its patrons the option to not burn this card when a new dealer comes to the game. The burn card shall be disclosed if requested by the player.
- (d) At the commencement of each round of play and either burned or used as the player's first card, the dealer shall, starting on his left and continuing around the table, deal the cards in the following order:
 - (1) One card face upwards to each box on the layout in which a wager is contained;
 - (2) One card face upwards to himself;
 - (3) A second card face upwards to each box in which a wager is contained.
- (e) After two cards have been dealt to each player and the appropriate number to the dealer, the dealer shall, beginning from his left, announce the point total of each player. As each player's point total is announced, such player shall indicate whether he wishes to surrender, double down, split pairs, stand or draw, as provided for by this chapter.
- (f) As each player indicates his decision(s), the dealer shall deal face upwards whatever additional cards are necessary to effectuate such decision consistent with these regulations and shall announce the new point total of such player after each additional card is dealt.
- (g) After the decisions of each player have been implemented and all additional cards have been dealt, the dealer shall deal a second card face upward to himself provided, however, that such card shall not be removed from the dealing shoe until the dealer has first announced "Dealer's Card" which shall be stated by the dealer in a tone of voice calculated to be heard by each person at the table. Any additional cards authorized to be dealt to the hand of the dealer by Section 12(b) shall be dealt face upwards at this time after which the dealer shall announce his total point count. In lieu of the requirements of this paragraph, the procedures set forth in (i) or (j) below may be implemented.
- (h) At the conclusion of a round of play, all cards still remaining on the layout shall be picked up by the dealer in order and in such a way that they can be readily arranged to indicate each player's hand in case of question or dispute. The dealer shall pick up the cards beginning with those of the player to their far right and moving counterclockwise around the table. After all the players' cards have been collected the dealer shall pick up their cards against the bottom of the players' cards and place them in the discard rack.
- (i) In lieu of the procedures set forth in (g) above, a gaming licensee may permit a blackjack dealer to deal their hole card face downward after a second card in a manner as to not

disclose the value of the card and before additional cards are dealt to the players provided that said dealer not look at the face of their hole card until after all other cards requested by the players pursuant to those regulations are dealt to them. Notwithstanding the foregoing, if a gaming licensee elects to utilize a card reader device and the dealer's first card is an ace, king, queen, jack or 10 of any suit, the dealer shall determine whether the hole card will give the dealer a blackjack prior to dealing any additional cards to the players at the table, in accordance with procedures approved by the Commission. The dealer shall insert the hole card into the card reader device by moving the card face down on the layout without exposing it to anyone, including the dealer, at the table.

- (1) If the dealer has a blackjack, no additional cards shall be dealt and each player's wager shall be settled in accordance with Sections 3, 7 and 20.
 - (2) The alternative dealing procedure described in this subsection shall not be used at any blackjack table which offers the '*progressive blackjack wager*' authorized by Section 19.
 - (3) If a gaming licensee offers the additional wager authorized by Section 17(a)(3) at a blackjack table that has a card reader device and the dealer has a blackjack, the dealer shall, starting from their left, offer any player that has been dealt two sevens as their initial two cards an additional card to complete the hand on which the additional wager has been made.
- (j) In lieu of the procedures set forth in (g) above, a gaming licensee may permit a blackjack dealer to deal their hole card face upward after a second card and before additional cards are dealt to the players, provided that the gaming licensee complies with the notice requirements set forth in 205 CMR 147.03. The alternative dealing procedure described in this subsection shall not be used at any blackjack table which offers the '*progressive blackjack wager*' authorized by Section 19. Notwithstanding any other provision of this section, the following rules shall apply whenever cards used to game at blackjack are dealt in accordance with this subsection:
- (1) Winning wagers shall be determined in accordance with Section 3(a) and (b), provided, however, that a player's wager shall be lost if the score of the player is the same as the dealer, except that a player's wager shall win if both the player and dealer have blackjack;
 - (2) Winning wagers shall be paid in accordance with Section 3(e), except that standard blackjack shall be paid at odds of 1 to 1;
 - (3) Surrender, pursuant to Section 8, and insurance wagers, pursuant to Section 9, shall not be available;
 - (4) A player may double down, pursuant to Section 10, only on a point count of 9, 10 or 11;
 - (5) Any player who elects to split cards of identical value, pursuant to Section 11, may not split pairs again if the second card so dealt is identical in value to a card of the split pair; and
 - (6) If the dealer has a blackjack, no additional cards shall be dealt and each player's wager shall be settled in accordance with Sections 3 and 7; provided however, if a casino elects to offer the additional wager authorized by Section 17(a)(3) and the dealer has blackjack, the dealer shall, starting from their left, offer each player that has been dealt two sevens as their initial two cards an additional card to complete the hand on which the additional wager has been made.
- (k) Whenever the cut card is reached in the deal of the cards, the dealer shall continue dealing

the cards until that round of play is completed after which the dealer shall:

- (1) Collect the cards as provided in (h) above;
- (2) Prepare to shuffle the cards, as follows whenever a single dealing shoe is used, the dealer shall remove the cards remaining in the shoe and place them in the discard rack to ensure that no cards are missing.

(m) No player or spectator shall handle, remove or alter any cards used to game at blackjack except as explicitly permitted by these regulations and no dealer or other gaming employee shall permit a player or spectator to engage in such activity.

(n) Each player at the table shall be responsible for correctly computing the point count of their hand and no player shall rely on the point counts required to be announced by the dealer under this section without themselves checking the accuracy of such announcement.

7. Payment of blackjack; even-money payout option for certain insurance wagers

- (a) If the first face up card dealt to the dealer is a 2, 3, 4, 5, 6, 7, 8, or 9 and a player has blackjack, the dealer shall announce and pay the blackjack at odds of 3 to 2 or 6 to 5 and, unless the player has also made a blackjack bonus wager pursuant to Section 20, shall remove the player's cards before any player receives a third card.
- (b) If the first face up card dealt to the dealer is an Ace, King, Queen, Jack or Ten and a player has a blackjack, the dealer shall announce the blackjack but shall make no payment nor remove any cards until all other cards are dealt to the players and the dealer receives his second card. If, in such circumstances, the dealer's second card does not give them blackjack, the player having blackjack shall be paid at odds of 3 to 2 or 6 to 5. If, however, the dealer's second card gives them blackjack, the wager of the player having blackjack shall be void and constitute a standoff.
- (c) If the first face up card dealt to the dealer is an Ace and a player has blackjack, a gaming licensee may, notwithstanding (b) above and before any additional cards are dealt, offer the player the option to be paid at odds of 1 to 1 on the blackjack wager instead of making an insurance wager pursuant to Section 9. If the gaming licensee chooses to offer the even-money payout option authorized by this subsection, notice shall be provided by the gaming licensee in accordance with 205 CMR 147.03.
- (d) If the licensee chooses the option to pay a blackjack at odd of 6 to 5 then Section 7(c) above is void.

8. Surrender

- (a) After the first two cards are dealt to the player and the player's point total is announced, the player may elect to discontinue play on his hand for that round by surrendering one-half their wager. All decisions to surrender shall be made prior to such player indicating as to whether they wish to double down, split pairs, stand, and/or draw as provided for in this section.

- (1) Should the first card dealt to the dealer be other than an ace or ten-value card, the dealer shall immediately collect one-half of the wager and return one-half to the player.
 - (2) Should the first card dealt to the dealer be an ace or ten-value card, the dealer will place the player's wager on top of the player's cards. When the dealer's second card is revealed, the hand will be settled by immediately collecting the entire wager should the dealer have blackjack or collecting one-half of the wager and returning one-half of the wager to the player should the dealer not have blackjack.
- (b) If the player has made an insurance wager and then elects to surrender, each wager will be settled separately as provided for above and in accordance with Section 9 and one will have no bearing on the other.
- (c) Each gaming licensee may, at its discretion, offer its patrons the surrender option authorized in this section, except that when a gaming licensee offers the rule variation multiple action blackjack pursuant to Section 18, or the '*progressive blackjack wager*' pursuant to Section 19, the surrender option shall not be available. A gaming licensee shall not initiate or terminate the use of the surrender option at a table unless the gaming licensee complies with the notice requirements set forth in 205 CMR 147.03.

9. Insurance wagers

- (a) Whenever the first card dealt to the dealer is an ace, each player shall have the right to make an insurance bet which, except as otherwise provided in Section 7(c), shall win if the dealer's second card is a King, Queen, Jack or 10 and shall lose if the dealer's second card is an ace, 2, 3, 4, 5, 6, 7, 8, or 9.
- (b) An insurance bet may be made by placing on the insurance line of the layout an amount not more than half the amount staked on the player's initial wager, except that a player may bet an amount in excess of half the initial wager to the next unit that can be wagered in chips, when because of the limitation of the value of chip denominations, half the initial wager cannot be bet. If a card reader device is not in use, all insurance wagers shall be placed immediately after the second card is dealt to each player and prior to any additional cards being dealt to any player at the table except, at the discretion of the gaming licensee, a player may place an insurance wager immediately prior to such player indicating whether they wishes to double down, split pairs, stand, and/or draw as provided for in this section and prior to any additional cards being dealt, provided that the gaming licensee complies with the notice requirements set forth in 205 CMR 147.03. If a card reader device is in use, all insurance wagers shall be placed prior to the dealer inserting their hole card into the card reader device.
- (c) All winning insurance wagers shall be paid at odds of 2 to 1.
- (d) All losing insurance wagers shall be collected by the dealer immediately after they draw their second face up card or discloses their hole card and before they draw any additional cards.
- (e) Insurance wagers shall not apply to the '*progressive blackjack wager*' permitted pursuant to

Section 19.

- (f) An insurance wager does not apply to any of the additional wagers permitted pursuant to Section 17(a).

10. Doubling down

- (a) Except for blackjack or a point count of twenty-one in two cards, a player may elect to double down, that is, make an additional wager not in excess of the amount of their original wager, on the first two cards dealt to them or the first two cards of any split pair on the condition that one and only one additional card shall be dealt to the hand on which they have elected to double down.
- (b) If a dealer obtains blackjack after a player doubles down, the dealer shall only collect the amount of the original wager of such player and shall not collect the additional amount wagered in doubling down.
- (c) Upon a player's election to double down as authorized by this section, the dealer shall deal the one additional card face upwards. Notwithstanding the foregoing or any other provision of this section, a gaming licensee may, at its discretion, require the dealer at one or more blackjack tables to deal the one additional card face down or, alternatively, permit a player to request that their one additional card be dealt face down. If the face down dealing procedure is implemented at a particular table upon the request of a player, the procedure shall, commencing with the next round of play, be offered to all players at that table. Regardless of the dealing procedure in effect, the one additional card shall be placed sideways on the layout. The gaming licensee shall post a notice of any optional dealing procedure in effect at a particular table and identify its choice of dealing procedure under this subsection in its approved gaming submission as either: face up at all tables, face down at designated table(s) or face down at the request of a player. If the one additional card is dealt face down, such card shall be turned face upward after the dealer has drawn additional cards to their hand in accordance with Section 12(b) and at such time as the player's wagers are to be settled in rotation at the conclusion of the round of play.

11. Splitting pairs

- (a) Whenever the initial two cards dealt to a player are identical in value, the player may elect to split the hand into two separate hands provided that they makes a wager on the second hand so formed in an amount equal to their original wager.
- (b) When a player splits pairs, the dealer shall deal a card to and complete the player's decisions with respect to the first incomplete hand on the dealer's left before proceeding to deal any cards to any other hand.
- (c) After a second card is dealt to a split pair, the dealer shall announce the point total of such hand and the player shall indicate their decision to stand, draw or double down with respect

thereto except that:

- (1) A player may not split pairs again if the second card so dealt is identical in value to a card of the split pair; and
 - (2) A player splitting aces shall only have one card dealt to each ace and may not elect to receive additional cards.
- (d) If the dealer obtains blackjack after a player splits pairs, the dealer shall only collect the amount of the original wager of such player and shall not collect the additional amount wagered in splitting pairs.
- (e) Notwithstanding the provisions of (c)(1) above, a gaming licensee may, at its discretion, permit a player to split pairs up to three times (a total of four hands) at a blackjack table with up to six player boxes or twice (a total of three hands) at a blackjack table with seven player boxes if notice of the option is provided as set forth in 205 CMR 147.03, except that this option shall not be available in games in which the rule variation multiple action blackjack is available pursuant to Section 18. If a gaming licensee elects to offer the option of splitting pairs more than once, it may, at its discretion, prohibit a player from splitting a pair of aces more than once (a total of two hands) if notice is provided as set forth in 205 CMR 147.03. All other requirements of this section shall apply to each hand which is formed as a result of splitting pairs more than once.
- (f) If a player has made the additional wager authorized by Section 17(a)(3), is dealt two sevens as their initial two cards and elects to split the pair of sevens, the dealer shall announce that the player is splitting sevens and forfeiting any potential payout for three sevens. The player shall be paid for the additional winning wager prior to any additional cards being dealt to either of the split hands.

12. Drawing of additional cards by players and the dealer

- (a) A player may elect to draw additional cards whenever his point count total is less than 21 except that:
- (1) A player having blackjack or a hard or soft total of 21 may not draw additional cards;
 - (2) A player electing to double down shall draw one and only one additional card;
 - (3) A player splitting aces shall only have one card dealt to each ace and may not elect to receive additional cards.
- (b) Except as provided in (c) below, a dealer shall draw additional cards to their hand in accordance with one of the following options:
- (1) The dealer shall draw additional cards until they have a hard or soft total of 17, 18, 19, 20 or 21; or
 - (2) The dealer shall draw additional cards until they have:
 - (i) A hard total of 17, 18, 19, 20 or 21; or
 - (ii) A soft total of 18, 19, 20 or 21.

- (c) Except as provided in Section 25(d), a dealer shall draw no additional cards to their hand, regardless of the point count, if decisions have been made on all players' hands and the point count of the dealer's hand will have no effect on the outcome of the round of play.

13. More than one player wagering on a box

- (a) Unless otherwise directed by the Commission, a gaming licensee may permit from one to three people to wager on any one box of the blackjack layout provided that the first person wagering on that box consent to additional players wagering on such box and provided further that the gaming licensee adhere to such procedures and limitations imposed by the Commission as dictated by the particular circumstances. This option may not be used at any blackjack table which offers the progressive blackjack wager authorized by Section 19.
- (b) Whenever more than one player wagers on a box, the player who is seated at that box shall have the exclusive right to call the decision with regard to the cards dealt to such box. In the case of no seated player, the person with the highest wager in the box shall have such right.
- (c) The player calling the decisions with respect to any box shall place their wager in that portion of the box closest to the dealer's side of the table and all other players wagering on such box shall place their wagers immediately behind and in a vertical line with the aforementioned wager.
- (d) Whenever more than one player is wagering on a box and the player calling the decisions decides to double down, the other players may also double their wagers but shall not be required to do so. In any event, only one additional card shall be dealt to the hand that is subject to the double down decision.
- (e) Whenever more than one player is wagering on a box and the player calling the decisions decides to split pairs, the other players shall either make an additional wager as provided for in Section 11 to cover each split pair or designate which of the split pairs they wish their initial wager to apply.
- (f) Whenever more than one player is wagering on a box, each player shall have the right to make an insurance bet in accordance with Section 9 regardless of whether the other players on that box make such a bet.
- (g) The Commission and its agents shall have the discretion and authority to limit, control and regulate the implementation of this section as is appropriate under the circumstances which shall include, without limitation, the right to limit the number of tables at which this procedure is permitted, the right to limit the number of boxes at each table on which more than one person can wager and the right to require the gaming licensee to establish the ability of its dealers to implement this section.

14. A player wagering on more than one box

A player may only wager on one box at a blackjack table unless the gaming licensee, in its

discretion, permits the player to wager on additional boxes.

15. Irregularities

- (a) In any table game when a card is delivered incorrectly the card will not under any circumstances be placed backwards on the game. As stated in the irregularities sections of the specific game the card will move forward or then be used as the dealer's next card or burned. The licensee will have the option to allow one or more players out of the hand when the dealer is found to make this error.
- (b) A card found turned face upwards in the shoe shall not be used in the game and shall be placed in the discard rack.
- (c) A card drawn in error without its face being exposed shall be used as though it were the next card from the shoe.
- (d) After the initial two cards have been dealt to each player and a card is drawn in error and exposed to the players, such card shall be dealt to the players or dealer as though it were the next card from the shoe. Any player refusing to accept such card shall not have any additional cards dealt to them during such round. If the card is refused by the players and the dealer cannot use the card, the card shall be burned.
- (e) If the dealer has a pat hand and accidentally draws a card for themselves, such card shall be burned.
- (f) If the dealer misses dealing their first or second card to themselves, the dealer shall continue dealing the first two cards to each player, and then deal the appropriate number of cards to themselves.
- (g) If there are insufficient cards remaining in the shoe to complete a round of play, all of the cards in the discard rack shall be shuffled and cut according to the procedures outlined in Section 5, the first card shall be drawn face downwards and burned, and the dealer shall complete the round of play.
- (h) If no cards are dealt to the player's hand, the hand is dead and the player shall be included in the next deal. If only one card is dealt to the player's hand, at the player's option, the dealer shall deal the second card to the player after all other players have received a second card.
- (i) If after receiving the first two cards and the dealer fails to deal an additional card(s) to a player who has requested such a card, then, at the player's option, the dealer shall either deal the additional card(s) after all other players have received their additional cards but prior to the dealer revealing their hole card, or call the player's hand dead and return the player's original wager.
- (j) If the dealer inserts their hole card into a card reader device when the value of their first card is not an ace, king, queen, jack or 10, the dealer, after notification to a casino supervisor,

shall:

- (1) If the particular card reader device in use provides any player with the opportunity to determine the value of the hole card, call all hands dead, collect the cards and return each player's wager; or
 - (2) If the particular card reader device in use does not provide any player with the opportunity to determine the value of the hole card, continue play.
- (k) If a card reader device malfunctions the dealer may only continue dealing the game of blackjack at that table using the dealing procedures applicable when a card reader device is not in use.
- (l) If the dealer fails to move their original face up card to the area of the layout designated for the second or third hand of the round in accordance with Section 18, the round shall continue as if the original face up card was moved to the appropriate area of the layout.
- (m) If the dealer inadvertently picks up their original face up card and places it in the discard rack prior to the completion of the second or third hand of multiple action blackjack, the dealer shall immediately notify a casino supervisor assigned to that table. The casino supervisor shall remove the appropriate cards from the discard rack and reconstruct the last hand of play so as to determine the dealer's original face up card. The original face up card shall be placed in the appropriate area on the layout, and the remaining cards shall be returned to the discard rack. Play shall resume in accordance with the rules of this chapter.
- (n) If the light at a player's betting area on a blackjack table which offers the progressive blackjack wager is not operating properly, no progressive wager shall be permitted in that betting area.
- (o) If the bonus blackjack system fails to select or display a payout amount when the bonus blackjack button is pressed, and the amount of the payout cannot be ascertained by a casino supervisor from the table controller or otherwise, the patron's wager shall be paid at 21-to-1.
- (p) If a gaming licensee implements the procedure by which one additional card is dealt face down to a hand on which a player has elected to double down pursuant to Section 10(c) and the dealer inadvertently deals such card face upwards, play shall continue and the player's wagers shall be resolved in completion of the round of play.
- (q) If the dealer mistakenly forgets to burn a card the hand will continue as if no mistake had been made.

16. Five cards totaling 21 rule

- (a) Whenever a player has achieved a score of 21 in five cards and the dealer has not achieved a blackjack or a score of 21, the winning hand shall be paid at odds of 2 to 1.
- (b) If the player has achieved a score of 21 in five cards and the dealer has blackjack, the player's wager shall be settled in accordance with Section 3(b). If the player has achieved a score of

21 in five cards and the dealer has achieved a score of 21 in three or more cards, the player's wager shall be considered void and said wager shall be returned to the player.

- (c) A gaming licensee may, in its discretion, offer to all patrons at a blackjack table the five cards totaling 21 option authorized in this section, provided that the gaming licensee complies with the notice requirements set forth in 205 CMR 147.03 prior to withdrawing the offer of this option.

17. Permissible additional wagers

- (a) A gaming licensee may, in its discretion, offer to all players at a blackjack table that does not offer the '*progressive blackjack wager*' authorized by Section 19 the option to make one of the following additional wagers provided that the gaming licensee complies with the notice requirements set forth in 205 CMR 147.03 prior to withdrawing the offer of this option:
 - (1) A wager on whether the player's initial two cards shall have a point total either greater than or less than 13;
 - (2) A wager on whether the player's initial two cards shall be of the same suit; or
 - (3) A wager on whether one or more of the player's initial three cards shall be a seven. The additional wager shall be \$1.00.
- (b) Prior to the first card being dealt for each round of play, each player shall make a wager against the dealer as required by Section 3(a) and (d) and, if given an option to make an additional wager, shall also indicate whether they wish to wager, as applicable, that:
 - (1) The point total of the player's initial two cards shall exceed 13, which wager shall win if the point total does exceed 13;
 - (2) The point total of the player's initial two cards shall be less than 13, which wager shall win if the point total is less than 13;
 - (3) The player's initial two cards shall be of the same suit, which wager shall win if the initial two cards are of the same suit; or
 - (4) One or more of the player's initial three cards shall be a seven, which wager shall win if one or more of the initial three cards dealt to the player is a seven.
- (c) An additional wager made pursuant to (a)(1) above shall be lost when the point total of the player's initial two cards equals 13.
- (d) All losing additional wagers shall be collected by the dealer immediately after the second card is dealt to each player and prior to any additional cards being dealt to any player at the table,
- (e) All winning additional wagers shall be paid immediately after the second card is dealt to each player and prior to any additional cards being dealt to any player at the table. Notwithstanding the foregoing, if a wager authorized by (a)(3) above is a winning wager because the player has received two sevens as the initial two cards dealt to their hand, the winning wager shall be paid immediately after the player elects to draw an additional card, surrender, stand, double down or split pairs. All winning additional wagers shall be paid at the following odds:

- (1) For wagers made pursuant to Section 17(a)(1) above, one to one; or
- (2) For wagers made pursuant to Section 17(a)(2) above, depending on the number of decks in use at the table and the cards received by the player, in accordance with one of the following options as selected by the gaming licensee; provided, however, that notice of the payout option selected by the gaming licensee or any change thereto shall be provided in accordance with the requirements of 205 CMR 147.03; and provided further, however, that the same payout option shall be used by a gaming licensee at all blackjack tables which use the same number of decks of cards:

(i) Single Deck Blackjack Tables:

| Initial Two Cards | Option 1 | Option 2 | Option 3 | Option 4 |
|--------------------------|----------|----------|----------|----------|
| King and queen | 50 to 1 | 10 to 1 | 5 to 1 | 25 to 1 |
| Any two cards | 2.5 to 1 | 3 to 1 | 3 to 1 | 2.5 to 1 |

(ii) Two Deck Blackjack Tables:

| Initial Two Cards | Option 1 | Option 2 | Option 3 | Option 4 |
|--------------------------|----------|----------|----------|----------|
| King and queen | 10 to 1 | 5 to 1 | 25 to 1 | 20 to 1 |
| Any two cards | 3 to 1 | 3 to 1 | 2.5 to 1 | 2.5 to 1 |

(iii) Four Deck Blackjack Tables:

| Initial Two Cards | Option 1 | Option 2 | Option 3 | Option 4 |
|--------------------------|----------|----------|----------|----------|
| King and queen | 5 to 1 | 25 to 1 | 20 to 1 | 50 to 1 |
| Any two cards | 3 to 1 | 2.5 to 1 | 2.5 to 1 | 2 to 1 |

(iv) Six Deck Blackjack Tables:

| Initial Two Cards | Option 1 | Option 2 | Option 3 | Option 4 |
|--------------------------|----------|----------|----------|----------|
| King and queen | 5 to 1 | 25 to 1 | 20 to 1 | 15 to 1 |
| Any two cards | 3 to 1 | 2.5 to 1 | 2.5 to 1 | 2.5 to 1 |

(v) Eight Deck Blackjack Tables:

| Initial Two Cards | Option 1 | Option 2 | Option 3 |
|--------------------------|----------|----------|----------|
| King and queen | 5 to 1 | 25 to 1 | 50 to 1 |
| Any two cards | 3 to 1 | 2.5 to 1 | 2 to 1 |

- (3) For wagers made pursuant to (a)(3) above, the player shall be paid only for the highest winning payout below:

| Hand | Payout Odds |
|--|-------------|
| Three sevens of the same suit | 5000 to 1 |
| Three sevens of any suit | 500 to 1 |
| Two sevens of the same suit (initial two cards) | 100 to 1 |
| Two sevens of any suit (initial two cards) | 50 to 1 |
| One seven (initial card) | 3 to 1 |

- (f) An additional wager shall be made by placing gaming chips or plaques and, if applicable, a match play coupon on the appropriate area of the blackjack layout, except that a verbal wager accompanied by cash may be accepted provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt to any player and such cash is expeditiously converted into gaming chips or plaques in accordance with internal control regulations.
- (g) Any additional wager made pursuant to this section shall not exceed the lesser of:
 - (1) The amount of the blackjack wager made by the player pursuant to Section 3(a) and (d);
 - or
 - (2) A maximum limit established by the gaming licensee.
- (h) A gaming licensee shall post the maximum limit of the additional wager, as established in (g) above, in accordance with 205 CMR 147.03.
- (i) An additional wager shall have no bearing on any other wager made by the player at the game of blackjack.

18. Multiple action blackjack rule

- (a) A gaming licensee may, in its discretion, offer to every player at a blackjack table the option to make either two or three separate wagers on the outcome of the players hand against either two or three separate hands of the dealer which shall be formed with the dealer's original face up card, provided that the gaming licensee complies with the notice requirements set forth in 205 CMR 147.03 prior to withdrawing the offer of this option. This option may not be used at any blackjack table which offers the progressive blackjack wager authorized by Section 19, the blackjack bonus wager authorized by Section 20, the streak wager authorized by Section 22, the Match-the-Dealer wager authorized by Section 23, the twenty point bonus wager authorized by Section 24, or the optional bonus wager authorized by Section 25, or the in-between wager authorized by Section 26, or the 21+3 wager authorized by Section 28, or the king's bounty sidebet wager authorized by Section 29.
- (b) Prior to the first card being dealt for the first of the three rounds of play, each player shall be required to make two or three wagers against the dealer as required by Section 3(a) and (d) by placing the wagers in the designated betting areas on the layout. A gaming licensee may, in its discretion, require every player to place a wager against all three of the dealer's hands.

The minimum number of wagers required and the minimum and maximum limits for each wager shall be posted at the table in accordance with 205 CMR 147.03.

- (c) After all wagers have been placed, the dealer shall deal the cards in accordance with Section 6(e). As each player's point total is announced, the player shall indicate whether they wish to double down, split pairs, stand or draw as provided for by this section, except that, a decision to double down or split pairs shall require an additional wager for each wager placed by the player in accordance with (b) above.
- (d) Any player may elect to make an insurance wager pursuant to Section 9 on any or all of their wagers made in accordance with (b) above. Such wager or wagers shall be decided individually based on the second card dealt to each of the dealer's hands.
- (e) After the decisions of all players have been implemented and all additional cards have been dealt, the dealer shall deal a second card to their original face up card in accordance with Section 6(h) and any additional cards required by Section 12(b).
- (f) Once all wagers on the dealer's first hand have been decided, the dealer shall collect all losing wagers and pay off all winning wagers based on wagers placed in the first spot of each player's betting area, except that all of a player's wagers shall be collected along with their cards when that player's hand exceeds a hard total of 21. The dealer shall collect all of their cards and place them face down in the discard rack in accordance with one of the following:
 - (1) If the hand of each player at the table has exceeded a hard total of 21, the dealer shall draw no additional cards pursuant to Section 12 and the dealer shall collect all of their cards including their original face up card; or
 - (2) If a wager remains on the second or third spot of a player's betting area, the dealer shall then collect all of their cards except their original face up card.
- (g) If the dealer's cards have been collected and discarded in accordance with (f)(2) above, the dealer shall move their original face up card to the area of the layout designated for the dealer's second hand and shall deal a second card to their original face up card in accordance with Section 6(h) and any additional cards required by Section 12(b).
- (h) Once all wagers on the dealer's second hand have been decided, the dealer shall collect all losing wagers and pay off all winning wagers based on wagers placed in the second spot of each player's betting area. The dealer shall then collect all of their cards except their original face up card and place them face down in the discard rack. The dealer shall then move their original face up card to the area of the layout designated for the dealer's third hand and shall deal a second card to their original face up card in accordance with Section 6(g) and any additional cards required by Section 12(b), except that if no player has made a third wager the round shall be concluded in accordance with (j) below.
- (i) Once all wagers on the dealer's third hand have been decided, the dealer shall collect all losing wagers and pay off all winning wagers based on wagers placed in the third spot of each player's betting area.

- (j) At the conclusion of the third hand, all cards still remaining on the layout shall be picked up in accordance with Section 6(h).

19. Progressive blackjack wager payouts; Super 4 Progressive Blackjack Wager Stax; Super 4 Progressive Blackjack Wager; Blazing 7's Progressive rules

Please **note** there is a '*progressive blackjack wager*' that has been reference previously in the rules of the game of blackjack. This wager which is italicized previously is a specific progressive with the name '*progressive blackjack wager*' and is not referencing all other progressive blackjack wagers that are listed in this section.

- (a) If a blackjack table includes the equipment that is required by internal control submission and the gaming equipment regulations to offer the '*progressive blackjack wager*', a gaming licensee may give each player at that blackjack table the option to make an additional one dollar wager on whether the player will be dealt any of the designated series of cards set forth in (d) below. This wager shall be known as the '*progressive blackjack wager*'.
- (b) Prior to the first card being dealt for each round of play, each player may make a '*progressive blackjack wager*' by placing a one-dollar gaming chip in the designated chip acceptor device at their betting position. Once such wagers have been placed, a light shall then illuminate at each betting position at which a '*progressive blackjack wager*' has been made. In accordance with the gaming equipment regulations the dealer shall ensure that only one '*progressive blackjack wager*' has been made for each light that is illuminated and shall verify that the number of gaming chips wagered equals the number of lights illuminated. The dealer shall then announce, "no more bets" and register the progressive wagers on the progressive meter and reset meter, if applicable. The dealer shall then deal the hand to all players in accordance with Section 6.
- (c) A player who has placed a '*progressive blackjack wager*' shall win the specified payout if they receive any of the following combinations of cards:

| Winning Hand | Payout |
|---|--------------------------------------|
| Four black or four red aces in the first four cards | 100% of the progressive meter amount |
| Three aces of the same suit in the first three cards | \$2,500.00 |
| Any three aces in the first three cards | \$250.00 |
| Two aces of the same suit in the first two cards | \$100.00 |
| Any two aces in the first two cards | \$25.00 |

- (d) A '*progressive blackjack wager*' shall have no bearing on any other wager made by a player at the game of blackjack and shall be paid irrespective of the point total of the hand of the dealer.
- (e) A winning player shall receive the payout for only the highest possible progressive blackjack hand.

- (f) A player shall only be permitted to make a ‘*progressive blackjack wager*’ if they have placed a blackjack wager in compliance with Section 3(a) and (d).
- (g) Prior to making a payout for a winning ‘*progressive blackjack wager*’, the dealer shall:
- (1) Verify that the player has received a winning combination of cards;
 - (2) Verify that the appropriate light on the acceptor device has been illuminated; and
 - (3) Have a casino supervisor validate the progressive blackjack payout pursuant to approved internal control procedures.
- (h) All winning ‘*progressive blackjack wagers*’ shall be paid in accordance with the amount on the primary meter when the player's regular blackjack wager is settled pursuant to Section 3(e), provided, however, if more than one player at a table has four black or four red aces on the first four cards, each player shall share equally in the amount on the progressive meter when the first player with four aces is to be paid. If a player has won a progressive payout which is not being paid from the table inventory container, the cards of that player shall not be collected until the necessary documentation has been completed pursuant to internal control regulations.
- (i) The rate of progression for the progressive meter or, if applicable, the reset meter and progressive meter combined, shall be no less than 70 percent for the ‘*progressive blackjack wagers*’. The initial amount placed on the progressive meter by the gaming licensee and the portion of the reset amount funded by the gaming licensee shall be established by each gaming licensee and approved pursuant to internal control regulations. In no instance shall the initial amount on the progressive meter or the reset amount funded by the gaming licensee be less than \$5,000.
- (j) A gaming licensee may, in its discretion, offer to all players at a blackjack table that does not offer the ‘*progressive blackjack wager*’ authorized above the option to wager on a Super 4 Progressive Blackjack Wager Stax, or any other approved progressive wager. Super 4 Progressive Blackjack Wager Stax is a side bet for Blackjack games configured with one, two, four, six, or eight decks and at tables that seat up to seven players. At the beginning of each game, the player must place the underlying blackjack wager and may optionally place the Super 4 Progressive Blackjack Wager Stax bet.
- (k) If the dealer’s hand is a blackjack, the player’s two-card hand and the dealer’s blackjack forms a four-card hand. This hand is then evaluated based on one of the configured pay tables the licensee uses below.

| Paytable 1 - 3 Level Progressive | | Reseed | Contribution |
|----------------------------------|------------------------|-----------------|-----------------|
| Royal Flush in Chosen Suit | 100% Star Progressive | <i>*Options</i> | <i>*Options</i> |
| Royal Flush (Any other suit) | 100% Spade Progressive | \$5,000 | 7% |
| Three of a Kind | 100% Heart Progressive | \$500 | 7% |
| Straight | | \$750 | |
| Flush | | \$250 | |

| | |
|---------------------------------|-------|
| Two Pair | \$200 |
| All Cards Same Color | \$100 |
| Pair | \$50 |
| Any Hand (nothing) | \$25 |
| Dealer Ace Up (No Blackjack) | \$10 |

| Paytable 2 - 4 Level Progressive* | | Reseed | Contribution |
|-----------------------------------|-----------------------------|-----------------|-----------------|
| Royal Flush in Chosen Suit | 100% Star Progressive | <i>*Options</i> | <i>*Options</i> |
| Royal Flush (Any other suit) | 100% Spade Progressive | \$5,000 | 5% |
| Three of a Kind | 100% Heart Progressive | \$500 | 3% |
| Straight | 100% Diamond Progressive | \$300 | 3% |
| Flush | \$250 | | |
| Two Pair | \$200 | | |
| All Cards Same Color | \$100 | | |
| Pair | \$50 | | |
| Any Hand (nothing) | \$25 | | |
| Dealer Ace Up (No Blackjack) | \$10 | | |

| Paytable 3 - 5 Level Progressive | | Reseed | Contribution |
|----------------------------------|-----------------------------|-----------------|-----------------|
| Royal Flush in Chosen Suit | 100% Star Progressive | <i>*Options</i> | <i>*Options</i> |
| Royal Flush (Any other suit) | 100% Spade Progressive | \$5,000 | 2% |
| Three of a Kind | 100% Heart Progressive | \$500 | 3% |
| Straight | 100% Diamond Progressive | \$300 | 3% |
| Flush | 100% Club Progressive | \$250 | 3% |
| Two Pair | \$200 | | |
| All Cards Same Color | \$100 | | |
| Pair | \$50 | | |
| Any Hand (nothing) | \$25 | | |
| Dealer Ace Up (No Blackjack) | \$10 | | |

| Star Progressive (top prize) Options | | |
|--------------------------------------|----------|--------------|
| | Reseed | Contribution |
| Option 1* | \$50,000 | 6% |
| Option 2 | \$25,000 | 7% |

| | | |
|----------|----------|-------|
| Option 3 | \$10,000 | 7.50% |
|----------|----------|-------|

*Recommended option

- (l) Additionally, if the dealer has an Ace up and does not have a blackjack, the player qualifies for one of the pays listed in the paytable. If the dealer's hand is not a blackjack and is not showing an ace, the bet loses.
- (m) If the licensee is using the Must Hit Progressive for Stax, the dealer hitting end-round will determine if there is a random winner from those that participated in the Super 4 Progressive Blackjack optional side bet. This will be indicated with the light-up bet sensor at that player spot as well as being indicated to the dealer on the dealer touch interface and the double-sided progressive display at the table. Table 1 below describes the optional Must Hit Progressive configurations:

Table 1. Must Hit Progressive Configurations

| Configuration # | Reset Value | Max Value | Increment Rate |
|-----------------|-------------|-----------|----------------|
| 1 | \$250 | \$1,000 | 5.00% |
| 2 | \$100 | \$500 | 5.00% |
| 3 | \$100 | \$200 | 2.00% |

- (n) Massachusetts licensees can opt for the updated pay table for the *Super 4 Progressive Blackjack*. Pay tables below are for gaming tables using an eight-deck configuration.

| Hand | Standard Pay | Envy Pay |
|--|------------------|----------|
| Royal Flush in Chosen Suit (A, K, Q, J, all in operator selected suit) | 100% Progressive | \$3,000 |
| Royal Flush (Any other suit) | 10% Progressive | \$1,000 |
| Three of a Kind | \$750 | N/A |
| Straight | \$400 | N/A |
| Flush | \$300 | N/A |
| Two Pair | \$200 | N/A |
| All Cards Same Color (all black or all red) | \$100 | N/A |
| Pair | \$50 | N/A |
| Any Hand (nothing) | \$25 | N/A |
| Dealer Ace Up (No BJ) | \$10 | N/A |
| Dealer Does Not Have Face Up Ace | Loss | N/A |

- (o) Blazing 7's Progressive is an optional progressive side bet for blackjack.
- (p) Players must make a standard blackjack bet in order to make a Blazing 7's progressive bet.
- (q) The Blazing 7's Progressive considers both the player's initial two cards and the dealer's up card. If the player does not have at least one 7 in the player's initial two cards, the progressive bet will lose.

(f) Sample paytables:

| Hand | Payouts | Hand | Payouts |
|-------------------------|-----------|-------------------------|-----------|
| 3 suited 7's | 100% | 3 7's – Diamonds | 100% |
| 3 same color 7's | 10% | 3 7's – Other | 10% |
| Three 7's | 200 for 1 | 3 7's – Same Color | 500 for 1 |
| First two Cards – 7's | 25 for 1 | 3 7's | 200 for 1 |
| First two cards – one 7 | 2 for 1 | First two cards – 7's | 25 for 1 |
| | | First two cards – one 7 | 2 for 1 |

*The meter will be reseeded when the 100% award hits. The cost of the reseed has been factored into the gaming establishment's mathematical advantage.

- (s) To begin each round, players must make their standard blackjack wager. They may also place an optional progressive wager. Players must place the progressive wagers on the sensor in front of their betting position. The sensor will light up.
- (t) Once all players place their bets, the dealer will press "START GAME" on the keypad. The sensor will then light up, indicating a progressive wager. The dealer will remove all progressive bets on the table.
- (u) The dealer will then follow standard dealing procedures for blackjack.
- (v) The player's Blazing 7's wager will win if the player has any 7's in their initial two cards (see payable).
- (w) If the player has two 7's in the first two cards and the dealer's up card is a 7, the player will qualify for one of the three 7's payouts.
 - a. Note – the "Two 7's" payout is based only upon the player's first two cards.
- (x) After the dealer has completed the initial deal and revealed their up card, they may resolve the progressive wager immediately.
- (y) Once all bets have been reconciled the dealer will hit "END GAME."
- (z) Paying a progressive winner:
 - a. The percentage pays (%) are paid from the progressive jackpot shown on the progressive meter.
 - b. When a player has as winning percentage pays (%), the dealer shall press the appropriate hand button on the keypad.
 - c. The dealer will contact a supervisor.
 - d. Once the casino verifies the progressive win, the supervisor will press the confirm button. To complete the action, a supervisor or executive card (depending on jackpot level) swipe is required. This records the win onto the Game Manager computer and adjusts the meter appropriately for the prize won. House procedures are then followed for paying the prize.

- e. When the dealer reconciles all action, he presses “END GAME.” This resets the system to begin the next hand.

20. Blackjack bonus wager

- (a) If a blackjack table includes the equipment required by the gaming equipment regulations to offer a blackjack bonus wager, a gaming licensee may offer each player at that blackjack table the option to make an additional wager of \$1.00 or \$5.00, as to whether the player will be dealt a blackjack in the first two cards. This wager shall be known as a blackjack bonus wager.
- (b) Prior to the first card being dealt for each round of play, each player may make a blackjack bonus wager by placing gaming chips in the designated betting area on the layout, except that a verbal wager accompanied by cash may be accepted, provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt and such cash is expeditiously converted into gaming chips in accordance with internal control regulations. The dealer shall then announce, “No more bets” and deal the hand to all players in accordance with Section 6.
- (c) A player shall be permitted to make a blackjack bonus wager only if they have first placed a blackjack wager in compliance with Section 3(a) and (d).
- (d) A player who has placed a blackjack bonus wager shall win if the player receives a blackjack in the first two cards.
- (e) After the second card is dealt to all players at the table, and prior to any additional cards being dealt to any player or the dealer:
 - (1) All losing blackjack bonus wagers shall be collected by the dealer; and
 - (2) The cards of any player with a winning blackjack bonus wager shall be placed underneath that player’s blackjack bonus wager by the dealer.
- (f) The dealer shall then proceed to complete the round of play, collecting any other losing wagers and paying off any other winning wagers in accordance with Section 6. After all such wagers have been settled, the dealer, starting on their left and continuing around the table, shall place the blackjack bonus button in front of each player with a winning blackjack bonus wager. Each winning blackjack bonus player shall press the blackjack bonus button once, causing the bonus amount payable to that player to be displayed on the blackjack bonus display.
- (g) Prior to making a payout for a winning blackjack bonus wager, the dealer shall:
 - (1) Verify that the player has received a winning combination of cards;
 - (2) Verify the amount of the blackjack bonus payout shown on the blackjack bonus display at the table;

- (3) In a tone of voice calculated to be heard by the patron who won it and the casino supervisor assigned to the table, verbally announce the amount of the blackjack bonus payout, if it is less than \$100.00; and
- (4) Have a casino supervisor confirm and verify the amount of the blackjack bonus payout, if it is \$100.00 or more.
- (h) After all winning blackjack bonus wagers have been paid, the dealer shall remove all cards and wagers remaining on the layout, in accordance with Section 6(h).
- (i) A blackjack bonus wager shall have no bearing upon any other wager made by a player at the game of blackjack and shall be paid regardless of the point total of the dealer's hand.
- (j) A gaming licensee shall pay winning blackjack bonus wagers at no less than the amounts listed below:

| Blackjack bonus wager | Blackjack bonus payout |
|-----------------------|------------------------------------|
| \$1.00 | \$5.00 minimum to \$1,000 maximum |
| \$5.00 | \$50.00 minimum to \$5,000 maximum |

- (k) Notwithstanding any minimum or maximum payoff amounts in (i) above, the house advantage for blackjack bonus wagers shall not exceed 30 percent or be less than zero. Additionally, although the house advantage may vary for different denominations of the wager, the house advantage for a blackjack bonus wager of any given denomination shall be the same in all blackjack games offered by that gaming licensee at any given time.
- (l) The blackjack bonus wager may not be offered at a blackjack table which offers multiple action blackjack wagers pursuant to Section 18, a progressive blackjack wager pursuant to Section 19, a streak wager pursuant to Section 22, a twenty point bonus wager pursuant to Section 24, or an optional bonus wager pursuant to Section 25, or the in-between wager authorized by Section 26, or the 21+3 wager authorized by Section 28.

21. Continuous shuffling shoe or device

In lieu of the dealing and shuffling requirements set forth in Sections 5 and 6, a gaming licensee may utilize a dealing shoe or other device designed to automatically reshuffle the cards provided that such shoe or device and the procedures for dealing and shuffling the cards through use of this device are approved by the Commission or its authorized designee.

22. Streak wager

- (a) If a blackjack table includes the information and equipment required by the gaming equipment regulations, a gaming licensee may, in its discretion, offer each player at that blackjack table the option to make an additional wager that the player will win either two, three, four or five consecutive hands of blackjack. This wager shall be known as a streak wager.

- (b) Prior to the first card being dealt for each round of play, any player who has placed a blackjack wager in compliance with Section 3(a) and (d), may make a streak wager by placing gaming chips in the appropriate designated betting area of the layout.
- (c) Once the round of play has been dealt, the dealer shall, starting with the player farthest to their right and continuing counterclockwise around the table, collect all losing blackjack and streak wagers and place them in the table inventory container, pay off all winning blackjack and streak wagers, place any necessary streak lammers in accordance with (d) below, and then collect the cards and place them in the discard rack in accordance with Section 6.
- (d) When any player making an optional streak wager has won an initial blackjack hand, the dealer shall place a lammer button or other marker device approved by the Commission in the player's streak betting area labeled "2," to indicate that the player has one winning blackjack hand and is attempting to obtain a second consecutive winning hand.
 - (1) If a player had placed a streak wager on the designated betting area labeled "2" and the player wins the next consecutive blackjack hand, the player shall win the streak wager in addition to the basic blackjack wager.
 - (2) If a player had placed a streak wager on the designated betting area labeled "3," the player must win the next two consecutive blackjack hands. If the player wins the second consecutive blackjack hand, the dealer shall move the lammer button onto the designated betting area labeled "3" to indicate that the player has won two consecutive hands and is attempting to obtain a third consecutive winning hand. If the player wins the third consecutive blackjack hand, the player shall win the streak wager in addition to the basic blackjack wager.
 - (3) If a player had placed a streak wager on the designated betting area labeled "4" the player must win the next three consecutive blackjack hands. With each consecutive win, the dealer shall move the lammer button onto the designated betting area labeled "3," and then onto "4". If the player wins the fourth consecutive blackjack hand, the player shall win the streak wager in addition to the basic blackjack wager.
 - (4) If a player had placed a streak wager on the designated betting area labeled "5" the player must win the next four consecutive blackjack hands. With each consecutive win, the dealer shall move the lammer button onto the designated betting area labeled "3," then onto "4," and then onto "5". If the player wins the fifth consecutive blackjack hand, the player shall win the streak wager in addition to the basic blackjack wager.
- (e) If a player loses a blackjack hand during the pendency of a streak wager, the streak wager shall lose and the dealer shall collect the losing streak wager and the losing blackjack wager from that player.
- (f) If a player makes a streak wager in conjunction with a blackjack hand, and thereafter fails or refuses to complete the underlying blackjack hand or any successive blackjack hands required to satisfy the streak wager, the streak wager shall be deemed abandoned and lost.
- (g) A push shall not advance or lose a streak wager.

- (h) A player who elects to split pairs on any hand during the pendency of a streak wager must win a majority of the split hands to advance the consecutive winning streak; otherwise the streak wager is lost. If a player wins and loses the same number of split hands, the streak wager is not advanced or lost. A push on a split hand shall not advance or lose a streak wager.
- (i) A streak wager shall have no bearing upon any other wager made by a player at the game of blackjack.
- (j) A gaming licensee shall pay winning streak wagers at no less than the amounts listed below:

| Streak wager | Streak payout |
|--|----------------------|
| Two consecutive winning hands | 3 to 1 |
| Three consecutive winning hands | 7 to 1 |
| Four consecutive winning hands | 17 to 1 |
| Five consecutive winning hands | 37 to 1 |

- (k) A player may make more than one streak wager at a time on a blackjack hand, provided that:
 - (1) All such streak wagers are placed simultaneously (that is, placing streak wagers on designated betting areas “3” and “4” at the same time) and prior to any cards being dealt for that hand;
 - (2) A player who makes a multiple streak wager may not place any additional streak wagers until all prior streak wagers made by that player have been determined; and
 - (3) When multiple streak wagers are in play, the dealer shall move the lammer to the next applicable streak betting area, if any, prior to paying any winning streak wager.
- (l) The streak wager may not be offered at a blackjack table which offers multiple action blackjack wagers pursuant to Section 18, a progressive blackjack wager pursuant to Section 19, a blackjack bonus wager pursuant to Section 20, a twenty point bonus wager pursuant to Section 24, or an optional bonus wager pursuant to Section 25, or the in-between wager authorized by Section 26, or the 21+3 wager authorized by Section 28, or the king’s bounty sidebet wager authorized by Section 29.

23. Match-the-Dealer wagers

- (a) A gaming licensee may, at its discretion, offer players at a blackjack table the option to make an additional Match-the-Dealer wager. The Match-the-Dealer wager of a player shall win if either of the player’s initial two cards matches the dealer’s initial card. For purposes of the Match-the-Dealer wager, any card with a face value of 10 or a point value of 10 (jack, queen, king) shall only match a card of identical ascription without regard to value.
 - (1) A winning Match-the-Dealer wager shall be paid in accordance with (f) below.
 - (2) If both of the initial cards dealt to a player match the dealer’s initial card, the player shall be paid for each card.

- (b) A Match-the-Dealer wager shall have no bearing on any other wager made by a player at the game of blackjack.
- (c) Prior to the first card being dealt for each round of play, a player who has placed the basic wager required by Section 3(a) may make a Match-the-Dealer wager. The minimum and maximum Match-the-Dealer wagers permitted by a gaming licensee shall be posted in accordance with 205 CMR 147.03.
- (d) A Match-the-Dealer wager shall be made by placing gaming chips, plaques or, if applicable, a match play coupon on the appropriate area of the blackjack layout, except that a verbal wager accompanied by cash may be accepted provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt to any player, and that such cash is expeditiously converted into gaming chips or plaques in accordance with internal control regulations.
- (e) Immediately after the second card is dealt to each player, and prior to any additional cards being dealt to any player at the table or the dealer and before any card reader device is utilized, all losing Match-the-Dealer wagers shall be collected by the dealer, and then all winning Match the Dealer wagers shall be paid in accordance with (f) below.
- (f) All winning Match-the-Dealer wagers shall be paid at no less than the following odds chart for each card that matches the dealer’s initial card:

Table 1. Pays — Match the Dealer

| Event | 2-deck | 2-deck (alt. 1) | 2-deck (alt. 2) | 3-deck | 3-deck (alt.) |
|-------------------------------|---------------|------------------------|------------------------|---------------|----------------------|
| 2 Suited Matches | - | - | - | 100 to 1 | 100 to 1 |
| 1 Suited and 1 Unsuited Match | 23 to 1 | 27 to 1 | 26 to 1 | 17 to 1 | 15 to 1 |
| 1 Suited Match | 19 to 1 | 24 to 1 | 23 to 1 | 13 to 1 | 11 to 1 |
| 2 Unsuited Matches | 8 to 1 | 6 to 1 | 6 to 1 | 8 to 1 | 8 to 1 |
| 1 Unsuited Match | 4 to 1 | 3 to 1 | 3 to 1 | 4 to 1 | 4 to 1 |

Table 2. Pays — Match the Dealer (Cont.)

| Event | 4-deck | 5-deck | 6-deck | 6-deck (alt.) | 8-deck | 8-deck (alt.) |
|-------------------------------|---------------|---------------|---------------|----------------------|---------------|----------------------|
| 2 Suited Matches | 24 to 1 | 30 to 1 | 22 to 1 | 20 to 1 | 28 to 1 | 20 to 1 |
| 1 Suited and 1 Unsuited Match | 16 to 1 | 18 to 1 | 15 to 1 | 14 to 1 | 17 to 1 | 14 to 1 |
| 1 Suited Match | 12 to 1 | 15 to 1 | 11 to 1 | 10 to 1 | 14 to 1 | 10 to 1 |
| 2 Unsuited Matches | 8 to 1 | 6 to 1 | 8 to 1 | 8 to 1 | 6 to 1 | 8 to 1 |
| 1 Unsuited Match | 4 to 1 | 3 to 1 | 4 to 1 | 4 to 1 | 3 to 1 | 4 to 1 |

- (g) The Match-the-Dealer wager may not be offered at a blackjack table that offers an optional bonus wager pursuant to Section 25.

24. Twenty point bonus wager

- (a) A gaming licensee may, in its discretion, offer each player at a blackjack table the option to make an additional wager that the player will be dealt a point count of twenty in the first two cards. For the purposes of these rules, this wager shall be known as the twenty point bonus wager.
- (b) A twenty point bonus wager shall have no bearing on any other wager made by a player at the game of blackjack.
- (c) Prior to the first card being dealt for each round of play, each player who has placed a blackjack wager in compliance with Section 3(a) may make a twenty point bonus wager by placing gaming chips, plaques or, if applicable, a match play coupon on the appropriate area of the blackjack layout, except that a verbal wager accompanied by cash may be accepted, provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt and such cash is expeditiously converted into gaming chips or plaques in accordance with internal control regulations. The minimum and maximum twenty point bonus wagers permitted by a gaming licensee shall be posted in accordance with 205 CMR 147.03.
- (d) The dealer shall then announce “No more bets” and deal the initial two cards to all players and the dealer in accordance with Section 6(d) and (i). Prior to any additional cards being dealt to any player at the table, the dealer shall, starting with the player farthest to their right and continuing counterclockwise around the table, settle in succession, except as provided in (e) below, all twenty point bonus wagers by collecting all losing wagers and paying all winning wagers in accordance with (f) below.
- (e) If the up card of the dealer is a ten, jack, queen, king or ace and a player who has placed a twenty point bonus wager has two queens of hearts, that player’s twenty point bonus wager shall be settled after all other twenty point bonus wagers. Upon notification to and in the presence of a floorperson, the dealer shall settle all such twenty point bonus wagers as follows:
 - (1) If the gaming licensee utilizes a card reader device pursuant to Section 6(i) and the dealer:
 - (i) Has a blackjack, the player shall be paid in accordance with (f) below when the player’s blackjack wager is settled; or
 - (ii) Does not have a blackjack, the player shall be paid in accordance with (f) below before any other cards are dealt; or
 - (2) If the gaming licensee does not utilize a card reader device, the player shall be paid in accordance with (f) below when the player’s blackjack wager is settled.
- (f) All winning twenty point bonus wagers shall be paid once for the highest qualifying hand and at no less than the odds in the following pay table selected by the gaming licensee and posted at the table pursuant to 205 CMR 147.03:

| Winning Hand | Paytable A | Paytable B |
|---|------------|------------|
| Queen of hearts pair and dealer blackjack | 1000 to 1 | 1000 to 1 |
| Queen of hearts pair | 125 to 1 | 200 to 1 |
| Matched 20 | 19 to 1 | 25 to 1 |
| Suited 20 | 9 to 1 | 10 to 1 |
| Any 20 | 4 to 1 | 4 to 1 |

- (g) For purposes of (f) above, the following definitions shall apply:
- (1) “Matched 20” – Two identical cards with a total value of 20, except for a queen of hearts pair (for example, two kings of diamonds).
 - (2) “Suited 20” – Two cards of the same suit with total value of 20 (for example, one king of diamonds and one jack of diamonds).
 - (3) “Any 20” – Two cards of different suits with a total value of 20 (for example, one king of diamonds and one king of hearts, or one king of diamonds and one jack of hearts).
- (h) Notwithstanding the minimum payout odds required in (f) above for a winning hand of queen of hearts pair and dealer blackjack, a gaming licensee may establish a maximum amount as approved by the Commission that is payable to all such winning hands in the aggregate on a single round of play, which amount shall be at least \$25,000 or the maximum amount that one patron could win per round when betting the minimum permissible wager, whichever is greater. Pursuant to any such established maximum payout limit, if more than one player at a table has a winning hand of queen of hearts pair and dealer blackjack, each player shall share the maximum payout amount proportionately to the amount of their respective wagers. The payout limit and the proportionate allocation between two or more players with such winning hands shall either be included on the layout or posted at the table pursuant to the gaming equipment regulations). If the payout limit is not included on the layout, each gaming licensee shall provide notice of any decrease in the payout limit in accordance with 205 CMR 147.03.
- (i) The twenty point bonus wager may not be offered at a blackjack table that offers multiple action blackjack wagers pursuant to the gaming equipment regulations, a progressive blackjack wager pursuant to Section 19, a blackjack bonus wager pursuant to Section 20, a streak wager pursuant to Section 22, or an optional bonus wager pursuant to Section 25, or the in-between wager authorized by Section 26, or the 21+3 wager authorized by Section 28, or the king’s bounty sidebet wager authorized by Section 29.

25. Optional bonus wagers

- (a) A gaming licensee may, in its discretion, offer each player at a blackjack table the option to make an additional wager that the dealer shall be required to draw a third card and that the third card will result in the dealer’s hand having a point total greater than 21.
- (b) Prior to the first card being dealt for each round of play, each player who has placed a blackjack wager in compliance with Section 3(a) may make the bonus wager authorized by

this section by placing their wager on the appropriate area of the blackjack layout. A verbal wager accompanied by cash may be accepted provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt to any player, and that such cash is expeditiously converted into gaming chips or plaques in accordance with internal control regulations.

- (c) The amount of an optional bonus wager shall be at least \$1.00 but shall not exceed the lesser of the player’s wager pursuant to Section 3(a) or any maximum amount established by the gaming licensee and posted in accordance with 205 CMR 147.03.
- (d) The optional bonus wager of a player shall lose if the dealer’s first two cards have a point count of 17 or higher or, if the dealer is required to draw a third card, the dealer’s first three cards have a point count of 21 or less. The optional bonus wager of a player shall win if the dealer is required to draw a third card and the third card results in the dealer’s hand having a point total of greater than 21. If the dealer’s first two cards have a point total of less than 17 and any player has placed an optional bonus wager under this section, the dealer shall be required to draw a third card regardless of whether all players have been dealt blackjack.
- (e) Immediately after the dealer either determines their first two cards have a point count of 17 or higher or deals a third card to their hand, the dealer shall, before any other wagers are settled, settle all optional bonus wagers. Starting with the player farthest to the dealer’s right who has placed an optional bonus wager and proceeding around the table in a counterclockwise direction, the dealer shall collect all losing optional bonus wagers and pay all winning optional bonus wagers based upon the value of the third card drawn by the dealer as set forth in the following pay table:

| Dealer’s Third Card Value | Payout Odds |
|----------------------------------|--------------------|
| Ten | 3 to 1 |
| Nine | 5 to 1 |
| Eight | 7 to 1 |
| Seven | 9 to 1 |
| Six | 15 to 1 |

- (f) Notwithstanding (e) above, if the dealer is required to draw three cards during a round of play and all three cards have a value of eight and are of the same color or suit, a gaming licensee shall pay each player who has placed an optional bonus wager as follows:

| Optional bonus wager | Payout Odds |
|---------------------------------------|--------------------|
| Three eights of the same color | 50 to 1 |
| Three eights of the same suit | 200 to 1 |

- (g) The optional bonus wager shall have no bearing on any other wager made by a player at the

game of blackjack.

- (h) The optional bonus wager authorized by this section may not be offered at a blackjack table that offers multiple action blackjack wagers pursuant to the gaming equipment regulations, a progressive blackjack wager pursuant to Section 19, a blackjack bonus wager pursuant to Section 20, a streak wager pursuant to Section 22, a Match-the-Dealer wager pursuant to Section 23, or a twenty point bonus wager pursuant to Section 24, or the in-between wager authorized by Section 26, or the 21+3 wager authorized by Section 28, or the king's bounty sidebet wager authorized by Section 29.

26. In-Between Wager

- (a) A gaming licensee may, in its discretion, offer players at a blackjack table the option to make an additional wager that, when "ranking" the initial two cards dealt to the player, one card will have a rank higher than and one card will have a rank lower than the first face up card dealt to the dealer (the rank of the dealer's card is "in-between").
- (b) Notwithstanding the value assigned to each card in Section 2(b), the rank of each card for purposes of determining a winning In-Between wager, in order of lowest to highest rank, shall be: two, three, four, five, six, seven, eight, nine, 10, jack, queen, king, and ace.
- (c) An In-Between wager shall have no bearing on any other wager made by a player at the game of blackjack.
- (d) Prior to the first card being dealt for each round of play, each player who has placed a blackjack wager in compliance with Section 3(a) may make an In-Between wager by placing gaming chips, plaques or, if applicable, a match play coupon on the appropriate area of the blackjack layout, except that a verbal wager accompanied by cash may be accepted provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt to any player and such cash is expeditiously converted into gaming chips or plaques. The minimum and maximum in between wagers permitted by a gaming licensee shall be posted in accordance with 205 CMR 147.03.
- (e) The dealer shall then announce, "No more bets" and deal the initial two cards to all players and the dealer in accordance with Section 6(d), (i), or (j). Prior to any additional cards being dealt to any player at the table and before any card reader device is utilized, the dealer shall, starting with the player farthest to their right and continuing counterclockwise around the table, settle in succession all In-Between wagers by collecting all losing wagers and paying all winning wagers in accordance with (f) below.
- (f) All winning In-Between wagers shall be paid at no less than the odds in one of the following pay tables pre-selected by the gaming licensee and posted at the table pursuant to 205CMR 147.03.

| | Table A | Table B | Table C | Table D |
|--------------------------|---------|---------|---------|---------|
| Triple match | 30 to 1 | 30 to 1 | 30 to 1 | 40 to 1 |
| One-card spread | 12 to 1 | 10 to 1 | 10 to 1 | 10 to 1 |
| Two-card spread | 6 to 1 | 6 to 1 | 5 to 1 | 5 to 1 |
| Three-card spread | 4 to 1 | 4 to 1 | 3 to 1 | 3 to 1 |
| All other spreads | 1 to 1 | 1 to 1 | 1 to 1 | 1 to 1 |

- (g) For purposes of (f) above, the following definitions shall apply:
- (1) “Triple match” – The dealer’s face up card has the same rank as each of the player’s initial two cards (for example, three jacks).
 - (2) “One-card spread” – The dealer’s face up card is one rank higher than one of the player’s initial two cards and one rank lower than the other of the player’s initial two cards (for example, dealer’s card is a five and the player’s cards are a four and a six).
 - (3) “Two-card spread” – The dealer’s face up card is one of two consecutively ranked cards, each of which is ranked higher than one of the player’s initial two cards and lower than the other of the player’s initial two cards (for example, dealer’s card is a five or six and the player’s cards are a four and a seven).
 - (4) “Three-card spread” – The dealer’s face up card is one of three consecutively ranked cards, each of which is ranked higher than one of the player’s initial two cards and lower than the other of the player’s initial two cards (for example, dealer’s card is a five, six, or seven and the player’s cards are a four and an eight).
 - (5) “All other spreads” – The dealer’s face up card is one of four or more consecutively ranked cards, each of which is ranked higher than one of the player’s initial two cards and lower than the other of the player’s initial two cards (for example, dealer’s card is a jack and the player’s cards are a four and an ace).
- (h) The In-Between wager may not be offered at a blackjack table that offers multiple action blackjack wagers pursuant to Section 18, a progressive blackjack wager pursuant to Section 19, a blackjack bonus wager pursuant to Section 20, a streak wager pursuant to Section 22, a Match-the-Dealer wager pursuant to Section 23, a 20 point bonus wager pursuant to Section 24, or an optional bonus wager pursuant to Section 25, or the 21+3 wager authorized by Section 28, or the king’s bounty sidebet wager authorized by Section 29.

27. Buster Blackjack

- (a) A gaming licensee may, in its discretion, offer each player at a blackjack table the option to make an additional wager called a Buster Blackjack bet that the dealer, who may be required to draw such additional cards as necessary to complete their hand, regardless of the outcome of all wagers placed pursuant to the rules otherwise applicable under this section to determine blackjack wagers, including insurance wagers, will “bust,” that is, have a point total greater than 21.

- (b) Prior to the first card being dealt for each round of play, each player who has placed a wager in compliance with Section 3(a), may make the wager authorized by Section 27(a) (hereafter, the Buster Blackjack Wager) the by placing a wager on the designated betting area of the blackjack layout. Any player playing multiple hands may make a Buster Blackjack Wager on each or any hand he or she is playing.
- (c) The amount of the Buster Blackjack Wager shall be at least \$1.00, but shall not exceed the lesser of the player's wager pursuant to Section 3(a) or any maximum amount established by the gaming licensee and posted in accordance with 205 CMR 147.03.
- (d) The Buster Blackjack Wager shall lose if:
 - (1) The dealer has a blackjack;
 - (2) The dealer's completed hand, dealt in accordance with subsection (f) of this section, does not exceed 21.
- (e) The Buster Blackjack Wager shall win and be payable in accordance with subsection (g) of this section if the dealer's completed hand exceeds 21.
- (f) The procedures for dealing of cards to players who have made a Buster Blackjack Wager shall comport with Section 6 (procedure for dealing out of a shoe), and Section 9 (insurance wagers), as may be applicable, except as follows:
 - (1) If a player who made a Buster Blackjack Wager has a blackjack and the dealer does not have a blackjack, the dealer must pay the blackjack and thereafter place the player's two cards face up under the player's Buster Blackjack Wager to indicate that the Buster Blackjack Wager remains in play, and separated so that both cards are visible.
 - (2) If a player who made a Buster Blackjack Wager busts, the dealer shall collect the blackjack wager and thereafter collect and place the player's cards face up under the player's Buster Blackjack Wager to indicate that the Buster Blackjack Wager remains in play.
 - (3) If any Buster Blackjack Wager remains in play after the determination of all players' blackjack wagers, the dealer shall complete his hand by drawing additional cards until he or she has:
 - (i) Either a hard total of 17, 18, 19, 20, or 21;
 - (ii) A soft total of 18, 19, 20, or 21; or
 - (iii) The dealer's hand is a bust.
- (g) A gaming licensee shall pay winning Buster Blackjack Wagers based on the number of cards in the dealer's completed hand at no less than the amounts listed below, using one of the following pay tables (all pays "to 1"):

| Cards | Paytable A | Paytable B | Paytable C | Paytable D | Paytable E | Paytable F |
|------------------|------------|------------|------------|------------|------------|------------|
| 8 or more | 250 | 200 | 250 | 200 | 250 | 250 |
| 7 | 50 | 50 | 50 | 50 | 50 | 50 |
| 6 | 15 | 15 | 12 | 12 | 12 | 20 |
| 5 | 4 | 4 | 4 | 4 | 3 | 8 |
| 4 | 2 | 2 | 2 | 2 | 2 | 2 |
| 3 | 2 | 2 | 2 | 2 | 2 | 1 |

(h) In addition to the Buster Blackjack Wager payouts made pursuant to (g), above, a gaming licensee may, in its discretion, offer a Free Bonus payout if each of the following conditions are met: (i) the player has a blackjack; (ii) the player has wagered a minimum of \$5.00 on their Buster Blackjack Wager; and (iii) the dealer's hand busted with at least seven cards.

(i) The Free Bonus authorized by subsection (h) above shall be based on the number of cards in the dealer's completed hand at no less than the fixed payout amounts listed below, using one of the following pay tables:

| Cards | Paytable B1 | Paytable B3 |
|------------------|-------------|-------------|
| 8 or more | \$8,000.00 | \$5,000.00 |
| 7 | \$1,000.00 | \$1,000.00 |

28. 21+3 wager

(a) A gaming licensee may, in its discretion, offer each player at a blackjack table the option to make an additional wager that the dealer's initial face up card and the player's initial two cards form a three-card poker hand recognized for payout in (f) below.

(b) For purposes of the 21+3 wager the rank of cards in order of highest to lowest rank, shall be: ace, king, queen, jack, 10, 9, 8, 7, 6, 5, 4, 3 and 2. Notwithstanding the foregoing, an ace may be used to complete a "straight flush" or "straight" formed with a 2 and 3. The three-card hands recognized for payout in accordance with (f) below, in order from highest to lowest rank, shall be:

- (1) Straight flush is a hand consisting of three cards of the same suit in consecutive ranking;
- (2) Three-of-a-kind is a hand consisting of three cards of the same rank;
- (3) Straight is a hand consisting of three cards of any suit in consecutive ranking; and
- (4) Flush is a hand consisting of three cards of the same suit.

(c) A 21+3 wager shall have no bearing on any other wager made by a player at the game of blackjack.

- (d) Prior to the first card being dealt for each round of play, each player who has placed a blackjack wager in compliance with Section 3(a) may make an 21+3 wager by placing gaming chips, plaques or, if applicable, a match play coupon on the appropriate area of the blackjack layout, except that a verbal wager accompanied by cash may be accepted provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt to any player and such cash is expeditiously converted into gaming chips or plaques. The minimum and maximum 21+3 wagers permitted by a gaming licensee shall be posted in accordance with 205 CMR147.03.
- (e) The dealer shall then announce, “No more bets” and deal the initial two cards to all players and the dealer in accordance with Section 6(d), (i) or (j). Prior to any additional cards being dealt to any player at the table and before any card reader device is utilized, the dealer shall, starting with the player farthest to their right and continuing counterclockwise around the table, settle in succession all 21+3 wagers by collecting all losing wagers and paying all winning wagers in accordance with (f) below.
- (f) All winning 21+3 wagers shall be paid at no less than the odds for the player’s highest ranking hand in one of the following pay tables pre-selected by the gaming licensee and posted at the table pursuant to 205 CMR147.03.

| Hand | Table A | Table B |
|------------------------|---------|---------|
| Straight flush | 9 to 1 | 30 to 1 |
| Three-of-a-kind | 9 to 1 | 20 to 1 |
| Straight | 9 to 1 | 10 to 1 |
| Flush | 9 to 1 | 5 to 1 |

- (g) The 21+3 wager may not be offered at a blackjack table that offers multiple action blackjack wagers pursuant to Section 18, a progressive blackjack wager pursuant to Section 19, a blackjack bonus wager pursuant to Section 20, a streak wager pursuant to Section 22, an optional bonus wager pursuant to Section 25, or an In-Between wager pursuant to Section 26, or the king’s bounty sidebet wager authorized by Section 29

29. King’s Bounty Sidebet

- (a) A gaming licensee may, in its discretion, offer each player at a blackjack table the option to make an additional wager that the player will be dealt a pair of cards that will add up to the value twenty using traditional blackjack rankings. This wager shall be known as a “King’s Bounty Sidebet.”
- (b) Prior to the first card being dealt for each round of play, each player may make a King’s Bounty Sidebet authorized by this section by placing their wager on the appropriate area of the blackjack layout, except that a verbal wager accompanied by cash may be accepted,

provided that it is confirmed by the dealer and casino supervisor at the table prior to the first card being dealt and such cash is expeditiously converted into gaming chips. The dealer shall then announce, "No more bets" and deal the hand to all players in accordance with Section 6.

- (c) The minimum and maximum bet the set wagers permitted by a gaming licensee shall be posted in accordance with 205 CMR 147.03.
- (d) Players are permitted to make a King's Bounty Sidebet for the dealer, the regular blackjack hand, or both; provided, however, that the combined King's Bounty wager for the player and the dealer shall not exceed the table maximum bet limit. If the player wagers the table maximum for their King's Bounty Sidebet, the player is permitted to wager a maximum of ten percent of the maximum of the table limit for the dealer's King's Bounty Sidebet.
- (e) A player who has placed a King's Bounty Sidebet shall win if the first two cards dealt to the player add up to twenty using traditional blackjack rankings.
- (f) After the second card is dealt to all players at the table, and prior to any additional cards being dealt to any player and prior to the dealer using the card reader device:
 - (1) All losing King's Bounty Sidebet shall be collected by the dealer, and
 - (2) All winning King's Bounty Sidebet will be paid out in accordance with section (h) below.
- (g) Prior to making a payout for a winning King's Bounty Sidebet, if the player has a pair of king of spades, the dealer shall:
 - (1) First determine if the dealer has a potential blackjack, and
 - (2) If there is a potential dealer blackjack, settle that bet at the end of the round.
- (h) A gaming licensee shall pay winning King's Bounty Sidebet in accordance with the paytables listed below, which shall be posted at the gaming table offering King's Bounty Sidebet:

| Hand | Table 1 | Table 2 |
|---|-----------|-----------|
| Pair Kings (Spades) and Dealer Blackjack | 1000 to 1 | 1000 to 1 |
| Pair Kings (Spades) | 100 to 1 | 200 to 1 |
| 2 Suited Kings | 30 to 1 | 50 to 1 |
| 2 Suited Queens, Jacks or 10s | 20 to 1 | 25 to 1 |
| Suited 20 | 9 to 1 | 9 to 1 |
| 2 Kings | 6 to 1 | 6 to 1 |
| Unsuited 20 | 4 to 1 | 4 to 1 |

- (i) After all King's Bounty Sidebet wagers are settled, notwithstanding the exception set forth in section (g) above, the round shall continue in accordance with the Rules of the Game of Blackjack.

(j) The King’s Bounty Sidebet wager may not be offered at a blackjack table which offers multiple action blackjack wagers pursuant to Section 18, a blackjack bonus wager pursuant to Section 20, a streak wager pursuant to Section 22, a 20 point bonus wager pursuant to Section 24, an optional bonus wager pursuant to Section 25, or the In-Between wager authorized by Section 26.

30. Tri Lux, Super 3 and Lucky George

(a) TriLux Bonus is an optional side bet for Blackjack games played with two, four, five, six or eight decks. The player begins by optionally placing the TriLux Bonus bet to participate in the side wager, in addition to their wager for the main Blackjack game.

(b) Additionally, the casino can choose to offer the Trilux Super 3 wager. If the player places the TriLux Bonus bet with four, five, six or eight decks in play, then they are also eligible to place the TriLux Super 3 bet.

(c) Once all wagers have been placed, the dealer will deal two face-up cards to all players, as well as two cards to themselves, one face-up and one face-down. The three face-up cards are then evaluated to determine the best three-card Poker hand that can be made. Depending on the payable, if the observed three-card Poker hand is either a Flush or better or a Pair or better, the wager wins and is paid according to configured payable. Otherwise the wager is lost.

Table 1. TriLux Bonus Paytables

| Outcome | TRILG-01 | TRILG-02 | TRILG-03 | TRI-01 | TRI-02 | TRI-03 |
|------------------------------|----------|----------|----------|--------|----------|----------|
| Mini Royal (A, K, Q, Suited) | N/A | N/A | N/A | N/A | N/A | 100 to 1 |
| Straight Flush | 8 to 1 | 25 to 1 | 25 to 1 | 9 to 1 | 2.5 to 1 | 35 to 1 |
| 3 of a Kind | 8 to 1 | 15 to 1 | 15 to 1 | 9 to 1 | 2.5 to 1 | 33 to 1 |
| Straight | 8 to 1 | 8 to 1 | 10 to 1 | 9 to 1 | 2.5 to 1 | 10 to 1 |
| Flush | 8 to 1 | 5 to 1 | 5 to 1 | 9 to 1 | 2.5 to 1 | 5 to 1 |
| Pair | Lose | Lose | Lose | Lose | 2.5 to 1 | Lose |

| TriLux BJ with Lucky George Paytables | | | | | | | | |
|---------------------------------------|--------|----------|---------|----------|---------|----------|-------------|----------|
| Deck Availability | 1 | | 2 | | 3 | | 4 | |
| | 1D-8D | | 1D-8D | | 1D-8D | | 1D,2D,6D,8D | |
| Hand | Pays* | LkyGrg** | Pays* | LkyGrg** | Pays* | LkyGrg** | Pays* | LkyGrg** |
| Straight Flush | 8-to-1 | \$1 | 25-to-1 | \$10 | 25-to-1 | \$10 | 25-to-1 | \$10 |
| Three of a Kind | 8-to-1 | \$1 | 15-to-1 | \$5 | 15-to-1 | \$5 | 15-to-1 | \$5 |
| Straight | 8-to-1 | \$1 | 8-to-1 | \$2 | 10-to-1 | \$2 | 10-to-1 | \$2 |
| Flush | 8-to-1 | \$1 | 5-to-1 | \$1 | 5-to-1 | NA | 5-to-1 | \$1 |

*Paytable is used with the Lucky George version only
 **Payouts are Fixed Dollar

| TriLux Super 3 Paytables | |
|--|-------------------|
| Hand | SUP-01* |
| | |
| | 4D - 8D BJ |
| | Pays* |
| Three of a Kind (Suited) | 270-to-1 |
| Straight Flush | 180-to-1 |
| Three of a Kind | 90-to-1 |
| *TriLux bet must be made to bet Super 3 bet. | |



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

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

CC: Dean Serpa, Executive Director

DATE: April 9, 2026

RE: Proposed FY2027 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 organizes the research into seven key focus areas, including:

Economic Impact Research

The economic impact research, currently being conducted by a team from the Boston University School of Public Health, analyzes the fiscal and economic effects of gaming across the Commonwealth. 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 research, currently being conducted by a team from the Boston University School of Public Health, analyzes the social and health effects of 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. This element of the Commission's research agenda has produced a baseline and follow-ups for each casino host and surrounding communities, as well as ongoing and upcoming research in other areas related to public safety. 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 PlayWell program. The introduction of mobile sports wagering has ushered 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 at risk of experiencing gambling-related harm and information on how gambling and problem gambling develop, progress, and remit. 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. MODE is expanding to include anonymized casino player data available to qualified researchers. To explore more about the Massachusetts Open Data Exchange: <https://massgaming.com/about/research-agenda/>

Ongoing and Upcoming Research

The proposed FY27 research agenda will take place in the context of several multi-year research projects currently underway or upcoming from previous years' research agendas:

- **Social and Economic Research:**
 - The Commission has contracted with Boston University School of Public Health to

conduct a multi-year social and economic research agenda with six aims:

- **Aim 1:** Conduct a state-representative survey of Massachusetts residents to assess gambling attitudes, gambling behavior, problem gambling, and how these attitudes and behaviors have changed over time.
 - **Aim 2:** Conduct and analyze large-scale survey data from Massachusetts college and university students to assess gambling behaviors and attitudes and understand relationships with other key factors.
 - **Aim 3:** Measure gambling advertising exposure and assess its effect on problem gambling behavior.
 - **Aim 4:** Conduct surveillance of economic outcomes related to casino and sports wagering.
 - **Aim 5:** Assess the impacts of casinos on county-level employment and wages and municipal-level government expenditures and revenue in Massachusetts.
 - **Aim 6:** Estimate the association of sports wagering with financial well-being and social needs using a state-representative survey of Massachusetts residents.
- **Study of student-athletes:** This project, conducted by the Athletic Department, Campus Life and Wellbeing, and the School of Public Health and Health Sciences at the University of Massachusetts Amherst, aims to use a Personalized Feedback-only approach specifically designed to address at-risk gambling behaviors among college students involved in university-sponsored club sports.
 - **Conversion of gaming to gambling:** This project will focus on the conversion of gaming to gambling, including social casinos, video gaming, loot boxes, tournaments, free-play games, tactics used by gaming companies, and any association with use of prediction markets or underage access to sports wagering platforms, with a particular focus on impacts on youth and young adults 20 and under and impacts on problem gambling.
 - **Brief on VIP programs:** This brief, carried out by GREO is focused on VIP programs, including: program structures and operational models, impacts on player behavior and risk, and implications for at-risk and vulnerable populations.
- **Public Safety**
 - **Sex Trafficking Study:** This study, awarded to Safe Exit Initiative, will assess the influence of casinos and casino resorts on sex trafficking in the Commonwealth.
 - **Gray and illegal market study:** A study of gambling on the gray and illegal markets among Massachusetts adults after the legalization of sports wagering, including characteristics of the gray and illegal markets, as well as frequency of gambling and motivation for gambling with unlicensed operators among people who gamble.
 - **Community-Engaged Research**
 - **Youth Perspectives on the Legalization of Sports Wagering:** This project's objective is to understand community perspectives on the social and public health impacts of legalized

sports betting in Massachusetts. To meet this objective, NORC at the University of Chicago (NORC) will engage a Community Advisory Board (CAB) to examine the legalization of sports betting in Massachusetts and its impact on young adults, ages 18-25, and support analysis and dissemination of data and findings.

- ***Impact of Paid Media on Awareness and Participation of Sports Betting Among College Students:*** This community-engaged research project, awarded to Suffolk University, focuses on the social, health, and educational impacts of the introduction of legal sports wagering on higher education students in Massachusetts, particularly regarding their exposure to and participation in sports betting through paid media advertising.
- ***Gambling on Addiction Recovery: Community Perspectives on the Impact of Legalized Gambling in Massachusetts:*** This community-engaged research project, awarded to Texas Tech University, aims to understand the impact of legalized gambling and sports betting on addiction recovery communities in Massachusetts, building on the Social and Economic Impacts of Gambling in Massachusetts studies.
- ***Gambling and Veterans:*** This community-engaged research project, conducted by Technical Assent, will examine how gambling affects veterans from diverse backgrounds across Massachusetts, and identify strategies to support them, and build research capacity in veteran-serving communities.
- **Evaluation of Responsible Gaming Initiatives**
 - ***Evaluation of the Voluntary Self-Exclusion Program:*** This study, being conducted by Greo in partnership with Cambridge Health Alliance, is an evaluation of the voluntary self-exclusion program to build upon the previous evaluation of this program presented in 2018.
 - ***Improving uptake of play management tools:*** Study on the utilization of player health tools on sports wagering apps in Massachusetts, as well as recommendations to increase uptake of player health tools. Proposals for this project are currently under review.

Proposed FY27 Gaming Research Agenda

The proposed FY27 Gaming Research Agenda is estimated to be \$2,770,000, an increase from the adopted FY26 budget of \$1,882,000. The increase is to support several new studies, provide financial support for one study using the anonymized player data collected as part of Section 97 of chapter 194 of the Acts of 2011, and a new major cohort study. As the FY27 research priorities are established, we will continue to work with the finance division to ensure sufficient funding from the Public Health Trust Fund to support the research deliverables.

Below, the proposed FY27 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 FY2027 Gaming Research Agenda | |
|--|--|
| Social and Economic Research | |
| The Expanded Gaming Act (M.G.L. c. 23K § 71) required the MGC to engage in research to understand the social and economic effects of casino gambling in Massachusetts. | |
| Task/deliverable | Statutory and Practical Significance |
| | Relates to: M.G.L. c. 23K, §71 (2); M.G.L. c. 23N, § 23 |
| Survey Methodology and Data Quality Brief (BUSPH) | As part of the social research, Boston University School of Public Health (BUSPH) will be conducting a state-representative survey of Massachusetts residents. This brief will include documentation of the survey instrument, sampling design, weighting procedures, response rates, and data quality metrics to support transparency and replicability. |
| Task/deliverable | Statutory and Practical Significance |
| | Relates to: M.G.L. c. 23K, §71 (2)(iii) (3)(ii); M.G.L. c. 23N, § 23 |
| Research Brief of Key Survey Findings (BUSPH) | A summary of key population survey findings designed for public-facing communication by the Commission. |
| Task/deliverable | Statutory and Practical Significance |
| | Relates to: M.G.L. c. 23K, §71 (2)(iii) (3)(ii); M.G.L. c. 23N, § 23 |
| GAME Index Baseline Brief (BUSPH) | As part of the social research, BUSPH will be measuring gambling advertising exposure and assessing its effect on problem gambling behavior. This deliverable will be the inaugural report from the Gambling Advertising Monitoring and Evaluation (GAME) index, documenting the volume, channels, and seasonal patterns of gambling advertising in Massachusetts. |
| Task/deliverable | Statutory and Practical Significance |
| | Relates to: M.G.L. c. 23K, §71 (2)(iv); M.G.L. c. 23N, § 23 |

| | |
|--|--|
| Annual Casino Economic Performance Brief (BUSPH) | Includes baseline and historical patterns in data provided by the operators and the publicly available data. |
| Task/deliverable | Statutory and Practical Significance Relates to: M.G.L. c. 23K, §71 (2)(iv)(vii); M.G.L. c. 23N, § 23 |
| Community Economic Tracking Brief (BUSPH) | Compilation and cleaning of longitudinal economic datasets for host and comparison communities, including employment figures, wage data, commercial real estate indicators, and municipal revenue and expenditure records. |
| Task/deliverable | Statutory and Practical Significance Relates to: M.G.L. c. 23K, §71 (2)(iv)(vii); M.G.L. c. 23N, § 23 |
| Employment and Wage Brief (BUSPH) | A descriptive analysis of county-level employment and wage trends in host and neighboring counties in the years before and after casino opening. |
| Task/deliverable | Statutory and Practical Significance Relates to: M.G.L. c. 23K, §71 (2)(iii)(iv) (3)(ii); M.G.L. c. 23N, § 23 |
| Financial Well-Being and Gambling Brief (BUSPH) | An analysis of the associations between gambling behavior and financial well-being indicators among Massachusetts residents, using population survey data. |
| Task/deliverable | Statutory and Practical Significance Relates to: M.G.L. c. 23K, §71 (2)(iii)(iv) (3)(ii); M.G.L. c. 23N, § 23 |
| Social Determinants of Health Analysis Brief (BUSPH) | An exploratory analysis of the relationships between gambling involvement and social determinants of health including housing stability, food security, employment status, and access to health care. |
| Task/deliverable | Statutory and Practical Significance Relates to: M.G.L. c. 23K, §71 (2)(iii)(3)(ii); M.G.L. c. 23N, § 23 |
| Gambling and suicidality | A study of the relationship between gambling and suicide. |
| Task/deliverable | Statutory and Practical Significance Relates to: M.G.L. c. 23K, §71 (2)(iii) (3)(ii)(iii); M.G.L. c. 23N, § 23(iii) |
| Springfield youth surveys | Support the addition of gambling-related questions to Springfield’s FY26 youth surveys. |

| Cohort Research | |
|---|--------------------------------------|
| The MGC has engaged in a line of research involving longitudinal cohort study of gambling behavior in the United States. These studies are meant to provide insights into demographic groups at risk of experiencing gambling-related harm and information on how gambling and problem gambling develop, progress, and remit. | |
| Task/deliverable | Statutory and Practical Significance |

| | |
|--------------|---|
| | Relates to: M.G.L. c. 23K, §71 (2)(iii) (3)(ii)(iii); M.G.L. c. 23N, § 23(i)(ii)(iii) |
| Cohort study | A longitudinal cohort study of gambling behavior in Massachusetts, and particularly focused on young adults. This study aims to provide insights into demographic groups at risk of experiencing gambling-related harm and information on how gambling and problem gambling develop, progress, and remit. |

| Public Safety Research | |
|--|--|
| The MGC has engaged in a line of research to examine whether changes in crime, disorder and other public safety harms can be attributed directly or indirectly to the introduction of casinos and sports wagering and recommend strategies for preventing and mitigating the harm. | |
| Task/deliverable | Statutory and Practical Significance |
| | Relates to: M.G.L. c. § 71 (2)(ii) |
| Support existing projects | Current projects include a study awarded to Safe Exit Initiative that assesses the influence of casinos and casino resorts on sex trafficking in the Commonwealth. |

| Community-Engaged Research | |
|---|---|
| Task/deliverable | Statutory and practical significance and description |
| | Relates to: M.G.L. c. 23K, § 71 (3)(ii); M.G.L. c. 23N, § 23 |
| Support existing projects | 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. Ongoing projects include Gambling on Addiction Recovery: Community Perspectives on the Impact of Legalized Gambling in Massachusetts (Texas Tech University) and a project on Gambling and Veterans (Technical Assent). |
| Task/deliverable | Statutory/practical significance and description |
| | Relates to: M.G.L. c. 23K, § 71 (3)(ii); M.G.L. c. 23N, § 23 |
| Support 2-3 new community-engaged research projects | The objective of community-engaged research is to more deeply understand and address the impact of casino gambling and sports wagering in Massachusetts's communities. The specific research topic or question is developed by the community through a community-participatory process. |

| 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 |
| | Relates to: M.G.L. c. 23N, § 23(iii) |
| Underage access to sports wagering platforms and best practices in prevention | A study of underage access to sports wagering platforms and best practices in prevention. |

| Data Sharing | |
|---|---|
| Task/deliverable | Statutory/practical significance and description |
| | Relates to: M.G.L. c. 23K, § 71 (2); Chapter 194, Section 97 |
| Maintain existing datasets in the MODE repository and add additional datasets as they become available. | 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. |
| Procure first research projects using player data | The FY27 research agenda contains funding to support one research project using the anonymized casino player data; the Commission will also be soliciting applications for other projects. |

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/practical significance and description |
|------------------|--|
| | M.G.L. c. 23N, § 23 |
| BRIDGE Project | The MGC-funded study conducted by researchers from the University of Nevada, Las Vegas International Gaming Institute, <i>AI and Player Risk Identification and Response Research Report</i> , contained a study that generated a user-friendly “catalogue” of behavioral risk indicators to help audiences understand their evidentiary support: The Behavioral Risk Indicators Database of Gambling Evidence (BRIDGE). This study aimed to lay the foundation for a “living review,” where this evidence base can be regularly updated and offering a collaborative resource for academic, regulatory, and industry stakeholders. This funding would support ongoing work on this project. |

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, Greo, in FY23 to help develop a strategic plan, provide ongoing training, consultation, and support to build in-house capacity to improve current KTE strategies, practices, and skill sets. In FY27, work on this initiative will finalize and mobilize the revised Responsible Gaming Framework.



TO: Chair Jordan Maynard
Commissioner Eileen O’Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Griffin Miniutti – Compliance Officer II, Sports Wagering

MEMO DATE: 4/2/2026 **MEETING DATE:** 4/09/2026

RE: Update to Caesars Sportsbook House Rules

REGULATION BACKGROUND:

Pursuant to 205 CMR 247.02(4), a Sports Wagering Operator shall not change or modify the House Rules without prior written approval of the Commission.

EXECUTIVE SUMMARY:

Caesars Sportsbook has submitted revisions to their Massachusetts online House Rules. A full detailed summary of the latest updates and additions can be found in the attached redlined exhibit.

The summary of changes is as follows:

1. **Cashout Policy:** Added language to advise patrons that wagers made with bonus funds are not subject to any early cashout.
2. **Auto Racing & Motorbikes:** 5 new market offerings. General rules and existing markets revised to specifically address Formula 1 events.
3. **Cricket:** 5 new market offerings. Revisions made to existing markets and general rules to better outline settlement policy and provide clarification for postponement procedure.
4. **Football:** Minor revisions to existing markets have been made to reduce the minimum amount of game time required for bets to stand.
5. **Golf:** 2 new market offerings, and minor revisions to existing market titles.



Sports Wagering Division

6. **Hockey:** 6 new market offerings, such as head-to-head and exact goal amount markets.
7. **Rugby League/Rugby Union:** 8 new market offerings. Revisions made to existing market for added clarity.
8. **Snooker:** Revisions to general rules regarding settlement policy in the event of a postponement.
9. **Soccer:** 21 new market offerings. Existing markets revised for clarity and general rules modified to define a goalkeeper's save.
10. **Tennis:** General rules and 1 existing market have been updated regarding settlement policy in the event of player retirements/disqualifications.
11. **Winter Sports:** General rules have been updated regarding settlement policy in the event of a postponement.

CONCLUDING STATEMENT:

The Sports Wagering Division confirms all requirements have been met under 205 CMR 247.02 and recommends approving these changes.

Exhibit

Revisions:

CASHOUT

- Wagers made with bonus funds are not subject to any early cashout.

AUTO RACING & MOTORBIKES

General Rules

- ~~Should both drivers be disqualified from the race due to race/technical infractions, then that matchbet will be considered void.~~
- For Formula 1, Results will be settled at the time of podium presentation. Any subsequent inquires / disqualification after the podium presentation will not affect settlement.

Driver/Constructor/Manufacturer/Team Matchup Betting

- Matchup winners will be decided by the official listed order of finish of the series' governing body. In Formula 1, this will be the listed order at the time of the podium presentation.
- In Formula 1, should both drivers be listed in the official results as 'Not Classified' (NC), then the matchup will be void.
- Should both drivers be disqualified from the race due to race/technical infractions, then that matchbet will be considered void.

Qualifying - Winning Margin

- Predict whether the winning margin between the specified fastest qualifier and the rest of the field will be over or between the given timeframes. Only times recorded in Q3 will count towards settlement.

Fastest Qualifier Without X

- Predict which driver/team sets the best time during the final qualifying session and wins the pole position for the specified race, without the named driver(s)/team(s)/constructor(s). The finishing position of the named driver(s)/ constructor(s)/ team(s) will be ignored for wagers placed on these markets.
- The driver/team must attempt a qualifying run or else the wagers will be void.

Fastest Pit Stop

- Predict which team will record the fastest pit stop in the specified race.
- If a driver/team does not have a pit stop in the specified race, bets will be settled as a loss.

Qualifying- To Reach Q2/Q3

- Predict a driver to reach the named qualifying session (Q2 or Q3) in the specified race.

Qualifying- Both Team Drivers To Reach Q2/Q3

- Predict that both drivers from a named team to reach the named qualifying session (Q2 or Q3) in the specified race.

CRICKET

General Rules

- In Limited Overs matches, for all pre-match markets except Money Line, wagers will be void if the scheduled numbers of overs are reduced by more than 20% due to weather or for any other delay. This is unless a winning market has already been determined or stated otherwise in the specific market rules below. ~~For all markets, if a winning market has already been determined before the reduction in overs, bets will stand.~~
- A postponed match is deemed to be a match that does not commence on the same day it is scheduled to do so.
- Should a match be postponed, all wagers will be void at the point of notification. The exception to this postponement rule is if a fixture is rescheduled at the point of postponement and starts within 48 hours of original start time, then wagers will stand.

Pre-Match Markets:

Match Betting/ Money Line

- If a match is shortened, wagers will be governed by the official competition rules. Where no official result is declared, wagers will be void.
- When no price is offered for the tie and the official result is a tie, any means introduced by the official governing body to determine a winner will count (ex: bowl off, super over, etc.). Super overs and bowl offs will not count for the settlement of any other market. If, after this, the result is still a tie and no other means are introduced by the official governing body to determine a winner, dead heat rules will apply.
- In the event of a tied test match, where all innings have been completed and both teams have the same score, dead heat rules will apply and wagers on the draw will be lost.
- If a match is abandoned due to outside interference and no official result is declared, wagers will be void.

Team Total Runs

- ~~Duckworth Lewis Stern adjustments do not count for wagering purposes.~~
- ~~Penalty runs added to the team total because of a slow over rate by the bowling team will count.~~
- ~~Runs scored in a Super Over will not count for settlement purposes.~~

Total Match Runs

- ~~In matches decided by a Super Over, runs scored during the Super Over will not count for settlement purposes.~~
- ~~Duckworth Lewis Stern adjustments do not count for wagering purposes.~~

- ~~Penalty runs added to the team total because of a slow over rate by the bowling team will count.~~

Fall of Next Wicket

- ~~In Limited Overs matches, if the innings are reduced due to adverse weather conditions, then wagers will be void unless the wicket subsequently falls, or the final score is greater than the quote at the time of wager placement.~~

Player Runs

- ~~In Test Match cricket, If a player retires hurt, wagers will be void unless the player is subsequently out, or their final score is greater than the quote at the time of wager placement.~~
- ~~A player must face at least one delivery for bets to stand.~~
- ~~The named player's team must complete at least 80% of their originally scheduled overs for bets to stand.~~

Runs in Next Over Live

- ~~Predict whether the number of runs scored in the over is higher or lower than a specific number.~~
- ~~If all six balls are not bowled due to the team being bowled out or reaching their target, wagers will stand provided one ball is bowled. However, if the over is not completed due to adverse weather conditions or the team declaring, then wagers will be void unless a winning market has already been unequivocally determined.~~
- ~~Any extras scored count towards the total.~~
- ~~In a Test Match, unless stated otherwise, only the first innings count.
In The Hundred, each over consists of only five balls (also referred to as Sets of 5).~~

Highest Opening Partnership

- Both teams must play at least 80% of their originally scheduled overs for bets to stand.

Most Sixes

- Both teams must play at least 80% of their originally scheduled overs for bets to stand.

Most Boundaries/Fours/Sixes Hit in the Match

- Both teams must play at least 80% of their originally scheduled overs for bets to stand

Total Match Boundaries

- Both teams must play at least 80% of their originally scheduled overs for bets to stand.

Total Match Fours/Sixes

- Both teams must play at least 80% of their originally scheduled overs for bets to stand.

Total Team Sixes

- At least 80% of the named team's originally scheduled overs must be played for bets to stand.

Total Team Boundaries

- At least 80% of the named team's originally scheduled overs must be played for bets to stand.

Player Boundary Fours

- Predict whether the total number of boundary fours will be over or under a specified number.
- Only Fours count.
- Only runs scored off the bat count.
- In Limited Overs matches, if the innings is reduced due to adverse weather conditions or if a player retires hurt, then wagers will be void unless the player is subsequently out, or his final score is greater than the quote at the time of wager placement.

Player Boundary Sixes

- Predict whether the total number of boundary sixes will be over or under a specified number.
- Only Sixes count.
- Only runs scored off the bat count.
- In Limited Overs matches, if the innings is reduced due to adverse weather conditions or if a player retires hurt, then wagers will be void unless the player is subsequently out, or his final score is greater than the quote at the time of wager placement.

Team Highest Total Runs in a Single Over

- Predict whether a team will score higher or lower than a specific number.

Century to be Scored in the Match (Any Player in the Match to Reach a Specific Target)

- The named player's team must complete at least 80% of their originally scheduled overs for bets to stand.

Team of Top Batsman/Team of Top Run Scorer

- Both teams must play at least 80% of their originally scheduled overs for bets to stand.

Top Batsman/Top Run Scorer/Top Bat and Team to Win

- At least 80% of the named team's originally scheduled overs must be played for bets to stand.

Top Wicket Taker/ Top Bowler/Top Bowler and Team to Win

- At least 80% of the opposing team's originally scheduled overs must be played for bets to stand.

Next Man Out/Next Player Out

- Predict the next player out.
- Both players must be at the crease at the same time for wagers to stand. In the event of neither player being dismissed nor one of the players retiring hurt before a wicket has fallen, wagers will be void.

Total Match Run Outs

- Predict whether the total number of run outs in the match will be over or under a specified number.

Next Over Runs Odd/Even

- Predict whether the number of runs scored in the over are odd or even.
- The specified over must be completed for wagers to stand unless a match result has already been determined. If an innings ends during an over, then that over will be deemed to be complete.

unless the innings is ended due to external factors (including bad weather), in which case all wagers will be void unless a match result has already been determined.

- If the over does not commence for any reason, all wagers will be void.
- Extras and penalty runs in the particular over count towards settlement.

Total Match Wides

- Predict whether the total number of wides will be over or under a specified number.

Most Run Outs

- Predict which team will have the most run outs.
- Wagers placed on this market are settled on the team having the most batsmen run out while batting.
- If neither team has anyone run out or if both teams have an equal number of run outs, the winning selection in this market will be a draw.

Bowler Match Wagers

- Predict the player who will take more wickets than his opponent. For wagers to stand, both bowlers must bowl at least one ball. In the event of a tie, wagers will be void unless wagering is available for the tie.
- Unless specified otherwise, bowler wagers will be based on the first innings.

First Innings Lead

- Predict the team to have the highest score after the first innings.
- Both teams must complete their first innings for wagers to stand (including declarations).

In-Play Markets:

Match Betting Live/Money Line Live

- If a match is shortened, wagers will be governed by the official competition rules. Where no official result is declared, wagers will be void.
- When no price is offered for the tie and the official result is a tie, any means introduced by the official governing body to determine a winner will count (ex: bowl off, super over, etc.). Super overs and bowl offs will not count for the settlement of any other market. If, after this, the result is still a tie and no other means are introduced by the official governing body to determine a winner, dead heat rules will apply.
- In the event of a tied test match, where all innings have been completed and both teams have the same score, dead heat rules will apply and wagers on the draw will be lost.
- If a match is abandoned due to outside interference and no official result is declared, wagers will be void.

Team Total Runs Live

- Duckworth-Lewis-Stern adjustments do not count for wagering purposes.
- Penalty runs added to the team total because of a slow over rate by the bowling team will count.
- Runs scored in a Super Over will not count for settlement purposes.
- In Limited Overs matches, if the scheduled number of overs is reduced due to weather or any other delay, then wagers will be void unless a winning market has already been determined.

Fall of Next Wicket Live

- Predict whether the next wicket will fall before or after a specified number of runs have been scored.
- Wagers will be void if the wicket stated does not fall unless a winning market has already been determined. If a player retires hurt, all wagers struck on that wicket are carried over onto the next partnership until a wicket falls.
- In Limited Overs matches, if the innings are reduced due to adverse weather conditions, then wagers will be void unless the wicket subsequently falls, or the final score is greater than the quote at the time of wager placement.

Player Runs Live

- Predict whether a named batsman will score higher or lower than a specific total of runs.
- A player must face at least one delivery for bets to stand.
- If a player retires hurt, wagers will be void unless the player is subsequently out, or their final score is greater than the quote at the time of wager placement.
- In Limited Overs matches, if the innings are reduced due to adverse weather conditions, then wagers will be void unless the player is subsequently out, or their final score is greater than the quote at the time of wager placement.

Runs in Over Live

- Predict whether the number of runs scored in the over is higher or lower than a specific number.
- If all six balls are not bowled due to the team being bowled out or reaching their target, wagers will stand provided one ball is bowled. However, if the over is not completed due to adverse weather conditions or the team declaring, then wagers will be void unless a winning market has already been unequivocally determined.
- Any extras scored count towards the total.
- In The Hundred, each over consists of only five balls (also referred to as Sets of 5).

FOOTBALL

General Rules

- Wagers for all markets will stand provided at least ~~55~~ 50 minutes of play have taken place and an official result is declared. If a game does not complete ~~55~~ 50 minutes of play, wagers will be void, unless a winning market has already been unequivocally determined.

Correct Score

- For game correct score, at least ~~55~~ 50 minutes must be played, or else wagers are void.

Highest/Lowest Scoring Team (Designated Time Period)

- All games must go at least ~~55~~ 50 minutes or else wagers will be void.

Total Points Scored in a Group of Games

- All games must go at least ~~55~~ 50 minutes or else wagers will be void.

Mythical Game Lines

- The games must be played on the scheduled day for action and results will stand provided at least ~~55~~ 50 minutes of play have taken place in each respective team's game.

Player to Score a Touchdown This Drive

- Predict whether the specified player will score a touchdown on the indicated drive.
- The player must have officially recorded a ~~reception~~ touchdown on the drive.

GOLF

Tournament Match Wagers

- If a player withdraws or is disqualified, the player who continues ~~on~~ will be the winner of the matchup.

The Tee Box

- Select the Winning Box
- Boxes will be based on the last digit of the completed round score, or tournament score, from 2 specified players.
- If either of the selected player(s) do not tee off or complete the round, wagers will be void. For tournaments scores, selected players must finish all 4 Rounds or wagers will be void. Playoffs do not count towards final score.

Match Play Hole Winner

- Wagers will be void if the pairing halves/ties the hole ~~unless a tie option is given~~. Wagers are action, provided all listed players in the pairing tee off on the specified hole.

Singles Matches

- ~~If the market includes a tie selection, the result will be determined over the scheduled number of holes. Fourball matches are played over 18 holes.~~

TGL Match Winner

- Predict the winning team through the 15 hole match.

TGL Total Points

- Predict whether the total points will be over or under a specified figure. Overtime is included

TGL Session 1 Winner

- Predict the winning team from Session 1 of the specified match. Session 1 is holes 1-9 played as triples alternation shots.

TGL Session 2 Winner

- Predict the winning team from Session 2 of the specified match. Session 2 is holes 10 –15, played as team singles.

HOCKEY

Empty Net Goal Exacta/Live

- Predict the exact number of Empty Net goals scored in a game.

Player Goals Head to Head/Live

- Predict which player will have the most goals
- Both players must play or wagers will be voided
- If both players register the same amount of goals wagers will be voided

Player Points Head to Head/Live

- Predict which player will have the most points
- Both players must play or wagers will be voided
- If both players register the same amount of points wagers will be voided

Goalie Saves Head to Head/Live

- Predict which goalie will have the most saves.
- Both players must play or wagers will be voided.
- If both players register the same amount of saves wagers will be voided.

Collective Hat Trick/Live

- Predict if collectively, the 3 players listed will score 3 Goals or more.
- Only one player must play for wagers to be action.

Number of Shootout Goals Exacta/Live

- Predict the exact number of Shootout Goals scored in the Shootout Period.
- There must be a shootout period or wagers will be voided.

RUGBY LEAGUE/RUGBY UNION

Top Season/Competition Try Scorer/Points Scorer

- Predict which player will score the most tries/**points** over the course of the regular season or competition.

Grand Slam

- Predict a team to win every fixture in the Six Nations.
- If the designated number of matches are not completed, bets are void.

Triple Crown

- Predict one team from England, Ireland, Scotland and Wales to defeat each of the three others in the Six Nations.
- If the designated number of matches are not completed, bets are void.

Season/Tournament Team Matchbets

- Predict which team will progress the furthest in a tournament or finish higher in a regular season.
- In case of a tie, bets will be void.

Player Tries/Points Matchbets

- Predict which player will score the most tries/points in a match/tournament/season.
- In case of a tie, bets will be void.
- For individual matches, both players must start the match for bets to stand.
- For tournament/season bets, both players must play in at least one match for bets to stand.

To Reach The Final/Make The Playoffs

- Predict a team to make the final/playoffs of a specific competition.

Man of Steel

- Predict the player to win the Man of Steel award.

Dally M Medal

- Predict the player to win the Dally M Medal award.

Top X Finish

- Predict a team to finish in the Top X places in the league/tournament.

SNOOKER

General Rules

- A postponed match is deemed to be a match that does not commence on the same day it is scheduled to do so.
- Should a match be postponed, all wagers will be void at the point of notification. The exception to this postponement rule is if a fixture is rescheduled at the point of postponement and starts within 48 hours of original start time, then wagers will stand.
- ~~• If a match is postponed, all wagers will be void unless the match is rescheduled to play the following day.~~

SOCCER

General Rules

- For player stats (shots, shots on target, assists, passes, tackles) markets, the following rules apply:
 - A Save is defined as being any instance where a Goalkeeper prevents the ball from entering the Goal with any part of their body when facing an intentional attempt from an opposition player.

Penalty Taken

- Predict whether or not a penalty will be taken during a match or specified half.
- Penalties taken during any possible penalty shootouts do not count.

To Take/Score/Miss a Penalty

- Predict which team will take, score or miss a penalty during the match or specified half.
- For any retaken penalties, only the outcome of the retaken penalty will count for settlement.
- Penalties taken during any possible penalty shootouts do not count.

Match to Go to Extra Time

- Predict whether or not a match will go to a period of Extra Time.

Win Both Halves

- Select a team to win **both** the first half and win the second half of a match. ~~The wager consists of 2 separate mini wagers – the first half and the second half.~~

Corners Handicap (3-way)

- Predict which team will take the most corners after the handicap spread has been applied. A handicap of (+/-) one or more corners will be given to one of the teams which will be added to the actual number of corners taken by them during the match.

Corners Spread

- Predict the team which will take the most corners during a match or specified half after the handicap spread has been applied to one of the teams.
- A handicap of (+/-) 0.5 (half of one) or more corners will be given to one/both teams which will be added to the actual number of corners taken.

~~First/Last~~ First/Xth Corner

- Predict which team will take the first/Xth corner during a match or specified half. Wagering options include no Xth corner, so for example, should a customer wager on the 8th corner market but no 8th corner is taken, the winning selection will be 'No 8th'. ~~Predict which team will take the first/last corner in a match.~~

Player Shots On Target From Outside The Penalty Area

- Predict whether the number of shots on target from outside of the penalty area made in a match by the named player will be over the specified number.
- The whole of the ball must be outside the penalty area at the time it was struck to count.

Player Headed Shots On Target

- Predict whether the number of headed shots on target made in a match by the named player will be over the specified number.
- Only shots on target made with a player's head will be settled as winner. Other body parts do not count.

Player Saves

- Predict whether the number of saves made in a match or specified half by the named player will be over the specified number.

Matchbet- Player Shots On Target

- Predict which of the two named players will have the most shots on target.
- If either player does not start the match, wagers on the market will be void.
- Should both players record the same number of shots on target, wagers will be void.

Matchbet- Player Shots

- Predict which of the two named players will have the most shots.
- If either player does not start the match, wagers on the market will be void.

- Should both players record the same number of shots, wagers will be void.

Matchbet- Player Tackles

- Predict which of the two named players will have the most tackles.
- If either player does not start the match, wagers on the market will be void.
- Should both players record the same number of tackles, wagers will be void.

Most Shots On Target

- Predict which team will have the most shots on target during the match or specified half.
- Should both teams record the same number of shots on target, 'Draw' will be the winning selection.

Most Shots

- Predict which team will have the most shots during the match or specified half.
- Should both teams record the same number of shots, 'Draw' will be the winning selection.

Most Tackles

- Predict which team will have the most tackles during the match or specified half.
- Should both teams record the same number of tackles, 'Draw' will be the winning selection

Extra Time (ET) Team Total Goals Live

- Predict whether the number of goals scored by a team in extra time, or specified half of extra time, will be over or under the specified number.

Extra Time (ET) Both Teams To Score

- Predict whether or not both teams will score in extra time or specified half of extra time.
- Wagers are settled only on the events that occur in extra time. This includes any injury/stoppage time added on by the match official at the end of extra time. The events that occur in normal time and penalty shootouts do not count.

Extra Time (ET) Draw No Bet

- Predict which team will win the period of extra time. Wagers placed on this market will be void if the specified period ends in a draw.
- Wagers are settled only on the events that occur in extra time. This includes any injury/stoppage time added on by the match official at the end of extra time. The events that occur in normal time and penalty shootouts do not count.

Extra Time (ET) Double Chance

- Predict the combination of two possible results of a extra time or a specified half of extra time from three possible permutations: home or draw | away or draw | home or away.
- Wagers are settled only on the events that occur in extra time. This includes any injury/stoppage time added on by the match official at the end of extra time. The events that occur in normal time and penalty shootouts do not count.

Extra Time (ET) Spread

- Predict the result of extra time, or specified half of extra time, after the handicap spread has been applied to one of the teams. A handicap of (+/-) 0.5 (half of one) or more goals will be given to one/both teams which will be added to the actual number of goals scored during extra time.
- Wagers are settled only on the events that occur in extra time. This includes any injury/stoppage time added on by the match official at the end of extra time. The events that occur in normal time and penalty shoot-outs do not count.

Extra Time (ET) Win Both Halves

- Select a team to win both the first half and the second half of extra time.
- Wagers are settled only on the events that occur in extra time. This includes any injury/stoppage time added on by the match official at the end of extra time. The events that occur in normal time and penalty shoot-outs do not count.

Extra Time (ET) Goal In Both Halves

- Predict whether or not a goal will be scored by either team in both halves of extra time.
- Wagers are settled only on the events that occur in extra time. This includes any injury/stoppage time added on by the match official at the end of extra time. The events that occur in normal time and penalty shoot-outs do not count.

Penalty Shootout Total Penalties Scored

- Predict the total number of penalties scored during a penalty shootout.
- Wagers are settled on events that occur in a penalty shootout only. Any penalties scored in normal time and/or extra time do not count.
- If a penalty in the shootout is retaken, only the outcome of the retaken penalty will count towards settlement.

Penalty Shootout Total Penalties Taken

- Predict the total number of penalties taken during a penalty shootout.
- Wagers are settled on events that occur in a penalty shootout only. Any penalties scored in normal time and/or extra time do not count.
- If a penalty in the shootout is retaken, only the retaken penalty will count towards settlement.

TENNIS

General Rules

- ~~If a player is disqualified or retires from the match, match winner wagers will be declared void.~~

Match Betting

- In the event of a retirement or disqualification before the 1st set has been completed, all bets will be void. In the event of a retirement or disqualification after the 1st set has been completed, bets on the retiring player or pair will be graded as a loss, while bets on the player or pairing progressing to the next round (or winning the tournament in the case of a final) will be deemed the winner, across all grades of tennis.

WINTER SPORTS

General Rules

- If an event is abandoned, wagers on that event will be void. ~~Should the event be postponed, wagers will be void unless the event is completed within 48 hours of the original start time.~~
- A postponed event is deemed to be an event that does not commence on the same day it is scheduled to do so.
- Should an event be postponed, all wagers will be void at the point of notification. The exception to this postponement rule is if the event is rescheduled at the point of postponement and starts within 48 hours of original start time, then wagers will stand

2026 Winter Olympic Games BY THE NUMBERS

HOW THE COMMONWEALTH WAGERED ON THE WINTER OLYMPICS

Grand Totals:

| | |
|-----------------------------------|-----------------------|
| Total Bets Placed | 804,424 |
| Total Gross Gaming Revenue | \$1,124,741.40 |
| Total Taxes Collected | \$265, 772.15 |

How Patrons Wagered:

| Sport | Wagers Placed | Gross Handle |
|---------------------------|----------------------|---------------------|
| Alpine Skiing | 6,065 | \$66,830.00 |
| Biathlon | 3,464 | \$52,525.62 |
| Bobsled | 4,640 | \$26,524.85 |
| Cross Country Skiing | 2,182 | \$25,986.00 |
| Curling | 43,244 | \$1,323,359.19 |
| Freestyle Skiing | 624 | \$2,986.66 |
| Ice Hockey | 731,501 | \$22,232,033.09 |
| Luge | 1,011 | \$9,984.05 |
| Short Track Speed Skating | 3,564 | \$45,027.50 |
| Skeleton | 1,225 | \$4,608.83 |
| Ski Mountaineering | 782 | \$3,255.61 |
| Snowboard | 646 | \$5,393.52 |
| Speed Skating | 5,476 | \$78,035.77 |



2026 Winter Olympics Sports Wagering Data

Public Meeting - April 9, 2026

Presented by Tom Lam

Agenda

- 1 | 2026 Winter Olympics | Milan Cortina
- 2 | Sports Wagering Insights |
Wagering Activity, Revenue and Taxes
- 3 | Sports Wagering Insights |
Event Specific Data



2026 Winter Olympics

| | |
|---------------------------|--------------------------------------|
| Location: | Milan and Cortina d'Ampezzo, Italy |
| Event Period: | February 6, 2026 – February 22, 2026 |
| Number of Nations: | 92 Nations |
| Total Sports: | 16 sports |
| Event Total: | 116 events |
| Total Athletes: | 2,884 athletes |



Sports Wagering Insights

Wagering Activity, Revenue and Taxes

123K+

Customers

800K+

**Wagers
Placed**

\$23M+

**Gross
Handle**

\$1.1M+

**Gross
Gaming
Revenue**

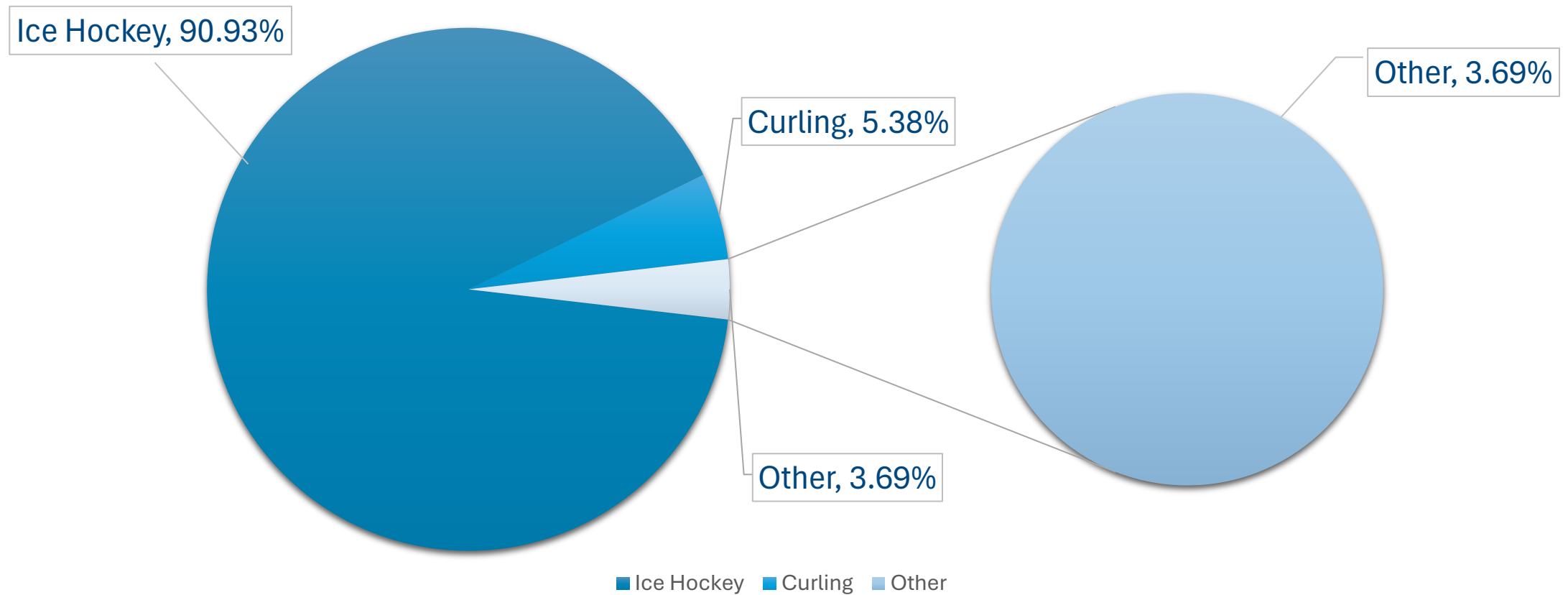
\$265K+

**Taxes
Collected**

MASSGAMING

Sports Wagering Insights

Event Specific Data





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To: Jordan Maynard, Chair
Eileen O'Brien, Commissioner
Brad Hill, Commissioner
Nakisha Skinner, Commissioner
Paul Brodeur, Commissioner

From: Nathan Saylor, Technical Compliance Coordinator
Carrie Torrisi, Chief of Sports Wagering Division
Cristian Taveras, Gaming Technical Compliance Manager
Kevin Gauvreau, Acting Director of IT Services

Date: March 16, 2026

Re: FanDuel Request to Approve Alternate Methods of KYC for ID scan and selfie Pursuant to 205 CMR 248.04(4)

The Commission's regulation 205 CMR 248.04(4) requires that "[t]he Sports Wagering Operator shall at the time of account establishment, utilize identity authentication questions that require a patron to provide information known only to the patron through security questions, unless an alternate method of authentication is approved by the Commission."¹

FanDuel uses a previously approved method that consists of personally identifiable information (PII) verification, device authentication, and identity authentication questions (also known as KBA). FanDuel is requesting to add an alternate method, creating a waterfall approach to its KYC process whereby the new waterfall approach will consist of device authentication, KBA questions, and ID scan with selfie verification. Given that the ID scan with selfie verification is an alternate method that a patron may use instead of KBA, this method requires Commission approval.

The Sports Wagering and Gaming Technical Compliance Divisions recommend that the Commission approve FanDuel's alternate method of KYC pursuant to 205 CMR 248.04(4).

¹ These types of questions are commonly referred to as knowledge-based authentication (KBA) questions.