



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 | May 21, 2026 | 10:00 a.m.
VIA CONFERENCE CALL NUMBER: +1-213-631-9908
PHONE CONFERENCE ID: 235 009 085#
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 - #589

1. Call to Order – Jordan Maynard, Chair

2. Meeting Minutes
 - a. April 23, 2026 **VOTE**

3. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. Presentation of report, "Potential Impacts of iGaming on Public Health in Massachusetts"- Dr. Judith Glynn, Head of Responsible Gambling Education and Policy at the Centre of Excellence in Responsible Gaming, University of Gibraltar and Principal at PRET Policy Solutions

4. Community Affairs Division – Derek Lennon, Chief Financial and Accounting Officer; Mary Thurlow, Senior Program Manager



Massachusetts Gaming Commission

- a. Encore Boston Harbor Quarterly Report – Juliana Catanzariti, Executive Director, Legal; Tom Coffey, Executive Director of Security and Investigations
5. Sports Wagering Division – Carrie Torrissi, Division Chief of Sports Wagering
- a. Caesars Request to Integrate Racebook App into Sportsbook App – Tom Lam, Compliance and Operations Manager; Justin Stempeck, Chief Deputy General Counsel; Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian **VOTE**
 - b. Sterling Suffolk’s Request to add DraftKings Racing as an Approved ADW Provider - Tom Lam, Compliance and Operations Manager; Justin Stempeck, Chief Deputy General Counsel; Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian **VOTE**
 - c. DraftKings Request to Integrate Racebook App into Sportsbook App - Tom Lam, Compliance and Operations Manager; Justin Stempeck, Chief Deputy General Counsel; Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian **VOTE**
 - d. DraftKings’ 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**
 - 1. Executive Session **VOTE**

The Commission anticipates that it will convene in an Executive Session in conjunction with its review of DraftKings’ 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.
 - e. Updates to Penn Sports Interactive’s (d/b/a theScore Bet) House Rules – David Harrison, Compliance Officer II **VOTE**
 - f. Updates to Bally’s Interactive’s (d/b/a Bally Bet) House Rules – Griffin Miniutti, Compliance Officer II **VOTE**
 - g. Discussion of UFC Freedom 250 Event – Andrew Steffen, Compliance and Operations Manager **VOTE**
 - h. Review of Proposed FY27 Audit Topics Pursuant to 205 CMR 239.07 – Carrie Torrissi, Chief of Sports Wagering Division **VOTE**



6. Investigations and Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
 - a. Encore Boston Harbor’s Request for Service Registration Exemption – Richard Lawless, Licensing Manager **VOTE**
 - b. Plainridge Park Casino’s Request for an Amendment to the Beverage License – Richard Lawless, Licensing Manager **VOTE**

7. Legal Division – Kevin Scanlon, General Counsel; Justin Stempeck, Chief Deputy General Counsel
 - a. 205 CMR 3.00: Harness Horse Racing - Discussion and Review of Regulations and Amended Small Business Impact Statement for Final Review and Adoption, and Authorization to send the Regulations to the Clerks of the Senate and the House – Melanie Foxx, Associate General Counsel **VOTE**
 - b. Executive Session Minutes
 - i. Executive Session **VOTE**
 The Commission anticipates that it will 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 G.L. c. 23K, § 21(a)(7): **February 26, 2026 at 10:37 A.M., 11:01 A.M., and 11:33 A.M.**; and G.L. c. 30A, § 21(a)(7), G.L. c. 23N, § 6(i) and G.L. c. 4, § 7(26)(b); **April 9, 2026.**
 - February 26, 2026 at 10:37 A.M. **VOTE**
 - February 26, 2026 at 11:01 A.M. **VOTE**
 - February 26, 2026 at 11:33 A.M. **VOTE**
 - April 9, 2026 **VOTE**

8. Commissioner Updates

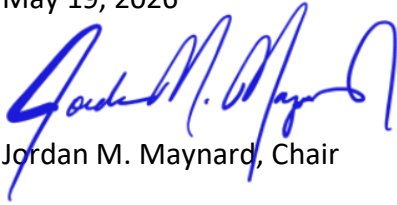
9. Other Business - Reserved for matters the Chair did not reasonably anticipate at the time of posting.



Massachusetts Gaming Commission

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: May 19, 2026 | 10:00 a.m. EST

May 19, 2026

A handwritten signature in blue ink, appearing to read "Jordan M. Maynard".

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: April 23, 2026, 10:00 A.M.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: +1-213-631-9908
PHONE CONFERENCE ID: 980 297 761#

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](#) (00:11)

Chair Maynard called to order the 587th 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](#) (00:54)

a. March 26, 2026

The March 26, 2026 public meeting minutes were included in the Commissioners' Packet on pages 4 through 12.

Commissioner Brodeur moved that the Commission accept the meeting minutes from the March 26, 2026 public meeting as included in the Commissioners' Packet and discussed here today, subject to necessary edits for typographical errors or any 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. Administrative Update (02:01)

a. Update on Division Chief, Financial Investigator staff position

Executive Director Dean Serpa stated that there was a recent vacancy for the position of Financial Investigations Division Chief. He stated that Commission staff had developed an updated job description, posted the position, and were ready to conduct candidate interviews. *A memorandum and the Financial Investigator Division Chief job description were included in the Commissioners' Packet on pages 13 through 16.*

Commissioner O'Brien asked if the person serving in this position is required to file a Statement of Financial Interest. Executive Director Serpa confirmed that they would and further, that he was required to inform the Commission of such positions. The Commission reached a consensus to have Commission staff move forward with the candidate interview process.

4. Racing Division (05:02)

a. Plainridge and Harness Horseman's Association of New England 2026 Purse Agreement

Director of Racing and Chief Veterinarian Dr. Alexandra Lightbown presented the 2026 purse agreement between Plainridge Park Casino ("PPC") and the Harness Horsemen's Association of New England ("HHANE"). *A memorandum and PPC's 2026 purse agreement were included in the Commissioners' Packet on pages 17 through 33.*

b. Division of Racing 2025 Annual Report (06:46)

Dr. Lightbown and Financial Analyst Chad Bourque presented the Racing Division's 2025 annual report. *The Racing Division's 2025 Annual Report was included in the Commissioners' Packet on pages 34 through 54.*

c. Plainridge Park Casino Request for Approval of NYRABets as an ADW Provider for Harness Racing (13:19)

Dr. Lightbown presented the request of Plainville Gaming and Redevelopment, LLC d/b/a Plainridge Park Casino ("PPC") for the approval of NYRA Bets as an advanced deposit wagering ("ADW") provider for harness racing in accordance with G.L. c. 128C, § 2(5). *A memorandum and PPC's request for the approval of NYRA Bets as an ADW provider for harness racing were included in the Commissioners' Packet on pages 55 through 56.*

Commissioner Hill moved that the Commission approve PPC’s request for approval of NYRA Bets as a 2026 account wagering provider for standardbred or harness races, as included in the Commissioners’ Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

5. [Sports Wagering Division](#) (16:04)

a. Update to Fanatics Betting and Gaming House Rules

Sports Wagering Compliance and Operations Manager Andrew Steffen presented proposed updates to FBG Enterprises Opco, LLC d/b/a Fanatics Betting and Gaming’s (“Fanatics”) House Rules. *A memorandum and Fanatics’s proposed updated House Rules were included in the Commissioners’ Packet on pages 57 through 62.*

Commissioner Brodeur sought clarification as to what would constitute an obvious error. Manager Steffen stated that the rule was designed so that the payout reflected the correct results and that the rule acted as a safeguard to ensure the integrity of the market should human error occur. Chris Mackey, a member of Fanatics’s compliance team, explained that the rule would apply, for example, in a situation where a call made on the floor is later overturned, which reverses the market. He stated that the obvious error process helped to ensure integrity and fairness for patrons.

Commissioner Hill moved that the Commission approve the updates to Fanatics Betting and Gaming’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.

6. [Legal Division](#) (22:09)

Chair Maynard stated that the Commission would take Agenda Items 7 and 8 before entering into executive session as the Commission did not anticipate reconvening the public meeting session following the executive session.

a. Executive Session Minutes (22:33)

I. Executive Session

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), c. 23N, § 6(i) and c. 4, § 7(26)(f): August 18, 2023; G.L. c. 30A, § 21(a)(7); c. 23N, § 6(i); and c. 4, § 7(26)(c): August 21, 2023 at 10:21 A.M. and 1:31 P.M.; and G.L. c. 30A, § 21(a)(7) and c. 23N, § 6(i): October 2, 2023 at 11:30 A.M. He stated that the Commission did not anticipate returning to the public meeting session following the executive session.

Commissioner O'Brien moved that the Commission go into executive session on the stated minutes and for the reasons just stated by the chair. 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.

Transcriber's Note: The Commission entered an executive session at 10:35 A.M. and did not reconvene the public meeting session.

7. Commissioner Updates (22:16)

Chair Maynard asked if there were any Commissioner updates. There were none.

8. Other Business (22:21)

Hearing no other business, Chair Maynard returned to Agenda Item 6(a).

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated April 21, 2026.](#)
2. [Commissioner's Packet from the April 23, 2026, meeting \(posted on massgaming.com\).](#)

MGC Research Snapshot

Potential Impacts of iGaming on Public Health in Massachusetts

February 2026

What you need to know

This research report brings together findings from five sources to inform the consideration of legalizing iGaming in Massachusetts. This research has illustrated the complexity of such a decision. It is clear that legalization of a new gambling activity will likely lead to increased participation, and with that, harms, which are disproportionately experienced by young people and other socio-economically disadvantaged populations. On the other hand, a regulated market does provide opportunities to address public health issues which are likely already occurring, such as underage gambling, unprotected gambling, and unregulated advertising.

What is this research about?

As Massachusetts is considering expanding its current regulated gambling market to include iGaming, the Massachusetts Gaming Commission (MGC) commissioned this study to examine the potential impact of introducing legal iGaming on public health. Following an open procurement process, the study was awarded to PRET Solutions Inc.

The study examines multiple sources to assess the potential impact of iGaming on public health in the Commonwealth, with particular focus on changes to participation, harms, and impacts on young people under the age of 25. The study is intended to provide insight into the public health risks of iGaming, and considerations for policy, regulation, and research that may minimize risk of harm in the event iGaming is legalized in the Commonwealth.

What did the research do?

To date, there is a lack of evidence examining the impacts of the introduction of iGaming in a mature market. Further, there is limited scientific evidence which examines the risks and behaviors associated with iGaming in isolation. The report draws on a mix of methods and sources to address these gaps and provide the best possible guidance. These include:

- An **evidence review** summarizing scientific evidence on the risks, the impacts of legalization, and harm minimization approaches;
- A **policy review** of the gambling regulatory and policy context in the states surrounding Massachusetts and beyond;
- **Key informant interviews** with regulatory and industry experts;
- **Data from New Jersey** to provide insight into the real impacts of regulated online casino gambling; and

- **Data from Massachusetts** to describe the current state of gambling in Massachusetts, including prevalence and vulnerable populations.

What did the research find?

iGaming participation vs. other forms of gambling:

- Evidence on participation in iGaming specifically is limited; however, evidence indicates that those who gamble online more broadly tend to be highly involved. A mix of variables is associated with online gambling participation, including sociodemographic (younger age, male gender, lower income, identifying as Hispanic or Black), personality (impulsivity), and environmental factors (access to legal gambling).
- Over time, young adults continue to show the highest increases in online gambling participation, but participation is growing for women and for people who do not identify as White, and these populations should be monitored for increases in problems and harm.
- Legalizing iGaming is likely to lead to increased gambling participation, including increased participation for populations at elevated risk for gambling-related harm.

iGaming and problem gambling:

- A small number of recent studies suggest iGaming, particularly online slots, may be associated with elevated risk.
- Sports wagering has also been associated with increased risk, which may be partly attributable to the high participation rates of younger males, a population with a high-risk profile.
- More broadly, research indicates that those who gamble in both online and land-based settings consistently experience the highest rates of gambling problems and harms (followed by online only, followed by land-based only).



Problem gambling:

- It is difficult to predict the impact on the population-level rate of problem gambling. However, risk and harms can be expected to increase with participation and will continue to be disproportionately experienced by vulnerable populations such as young people, non-White populations, and those who are already socioeconomically disadvantaged. This is particularly important as harms are disproportionately concentrated and severe among those who are already disadvantaged.
- While the impacts of iGaming on young people specifically have not been thoroughly examined, young adults aged 18-24 are consistently identified as at heightened risk of gambling problems and harms from online gambling, including both sports wagering and casino games.
- Evidence additionally shows that young people are at greater risk of experiencing the most severe harms from gambling, with gambling problems linked to suicide attempts.
- Underage youth are also at high risk, especially because they are likely gambling on unregulated sites.
- Legalization of iGaming may increase help-seeking, which may partly be due to consumers becoming more aware of support resources.

Advertising:

- Without strict guidelines, gambling advertising will likely become pervasive, with particularly negative impacts to young people and other vulnerable groups.
- The dramatic increase in gambling advertising that typically follows legalization of iGaming increases participation, risk, and harm among underage youth and young adults. The potential impacts of increased advertising are especially significant for young people, as operators are targeting them in increasingly innovative and unenforceable ways (e.g., social media, influencer marketing).
- The negative impacts of increased advertising have been shown to disproportionately affect those who are at-risk or already experiencing harms.

If iGaming is legalized in Massachusetts, a regulated market provides opportunity:

- To reduce and mitigate public health impacts which are likely occurring for those gambling in the illegal market;
- To effectively protect at-risk gamblers and youth under the age of 25, for example through strict advertising restrictions, special account limits for younger players, adequate age verification, consumer protection measures, economic integrity and stability, and transparency.

Recommendations

Following a trend towards opening new gambling markets, no new legislation to expand gambling has passed in any US state in 2024 and 2025. This may be due to a combination of unmet economic expectations as well as growing evidence and concerns related to impacts on public health. Additionally, the excessive levels of advertising which have followed legalization in markets worldwide have created widespread alarm and dismay.

About the researchers

Dr. Judith Glynn and Darcy Phillips are with PRET Solutions Inc. Dr. Rachel Volberg is Research Professor at the School of Public Health and Health Sciences, University of Massachusetts Amherst. Dr. Lia Nower is Associate Dean for Research, Distinguished Professor and Director, Center for Gambling Studies, Rutgers University. For more information about this report, please contact Judith Glynn at judith@pretpoliticsolutions.ca.

This report examines these and other implications of legalizing iGaming in Massachusetts and proposes policies and considerations that would minimize negative impacts to public health while maximizing the economic benefits to the Commonwealth. If iGaming is legalized in Massachusetts, the report proposes twelve specific policy recommendations across five key principles:

- Make harm minimization the foundation of regulation (by establishing harm reduction as the primary objective of legalization and by harmonizing protections across all online gambling activities, including iLottery and sports wagering)
- Ensure multiple levels of protections (for example, establish rigorous advertising restrictions; protect underage youth; protect young players by establishing targeted account-based limits and limiting cross-promotion of gambling activities)
- Maximize economic development to support public health
- Maximize channelization to achieve objectives (for example, implementing strong monitoring and enforcement mechanisms to support the legal market and reduce illegal gambling)
- Ensure adequate enforcement to support objectives

Areas of future research should include monitoring play behavior trends, distinguishing the impact of different online gambling activities, monitoring changes in early intervention and treatment, establishing a research program on youth and young adults, and developing an evaluation framework to guide operator training.

Citation

Glynn, J., Volberg, R., Nower, L., Phillips, D. (2025). Potential impacts of iGaming on public health in Massachusetts. Toronto, ON: Pret Solutions, Inc.

Key Words

Social Impact

About this Snapshot

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

Funding

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





Potential Impacts of iGaming on public health in Massachusetts

Report prepared by PRET Solutions Inc. for the
Massachusetts Gaming Commission

January 2026

Authors

Dr. Judith Glynn is Head of Responsible Gambling Education and Policy at the Centre of Excellence in Responsible Gaming, University of Gibraltar and Principal at PRET Policy Solutions. Dr. Glynn is the lead author of this report.

Dr. Rachel Volberg, Research Professor at the School of Public Health and Health Sciences, University of Massachusetts Amherst. Dr. Volberg is the lead author on the *Massachusetts Context* section and reviewed all sections of the report.

Dr. Lia Nower, Associate Dean for Research, Distinguished Professor and Director, Center for Gambling Studies, Rutgers University. Dr. Nower is the lead author on the *New Jersey Experience* section and reviewed all sections of the report.

Darcy Phillips, Principal at PRET Policy Solutions, conducted the evidence review and is a co-author on the report.

Acknowledgements

The authors would like to acknowledge the Massachusetts Gaming Commission for the opportunity to contribute to the important conversation surrounding potential impacts of iGaming on public health in Massachusetts.

Table of Contents

ACKNOWLEDGEMENTS	II
List of Tables	v
List of Figures	v
GLOSSARY OF TERMS & ABBREVIATIONS	VI
EXECUTIVE SUMMARY	XI
Gambling in MA	xi
Purpose of Study	xi
Research Questions	xii
Inputs & Methods	xii
Key Findings: Potential Impacts	xiii
Considerations for Policy, Regulation & Research	xv
Conclusion	xix
INTRODUCTION	22
Gambling in Massachusetts	22
Purpose of Study	22
Research Questions	23
Report Structure	24
METHODOLOGY	26
Evidence Review	26
Policy Review: Surrounding States & National Trends	29
Informant Interviews	30
The New Jersey Experience	31
The Massachusetts Context	33
Summary of Methods	40

SUMMARY OF FINDINGS	42
EVIDENCE REVIEW	45
Risks of iGaming	45
Implications of Legalizing New Forms	47
Approaches and Strategies to Address Gambling Harms	49
POLICY REVIEW: SURROUNDING STATES & NATIONAL TRENDS	51
Surrounding States	52
National Policy Trends	54
INFORMANT INTERVIEWS	59
Ontario, Canada – Making the Gray Market White	59
New Jersey, USA – Navigating National Prohibitions	63
THE NEW JERSEY EXPERIENCE	69
Participation & Risk	69
Online Casino Gamblers	75
Sports Wagerers	76
THE MASSACHUSETTS CONTEXT	80
Comparing Monthly Online & Non-Online Gamblers	81
Comparing Online Sports Bettors & Online Non-Sports Gamblers	93
Emerging Adult Gamblers	102
Summary: The Massachusetts Context	109
DISCUSSION & POLICY RECOMMENDATIONS	112
Potential Public Health Impacts	112
Considerations for Policy, Regulation, and Research	121
Conclusion	130
REFERENCES	131

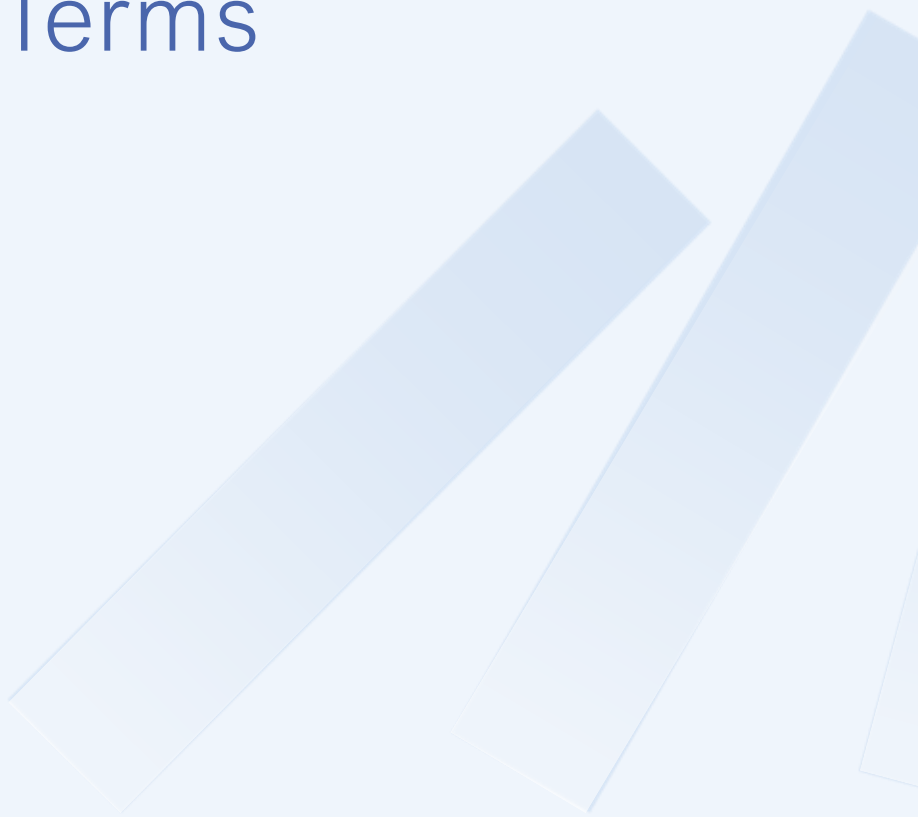
List of Tables

Table 1. Online panel samples for analysis	34
Table 2. Basis for classifying panelists using the PPGM	37
Table 3. Basis for classifying respondents using the PGM.....	38
Table 4. Research question / method matrix	40
Table 5. Findings by research question	42
Table 6. Increases in sports wagering taxes since 2023	58

List of Figures

Figure 1 PRISMA Protocol of Systematic Review	28
Figure 2 Demographic characteristics of online and non-online monthly gamblers (unweighted)	82
Figure 2 Education status of online and non-online monthly gamblers (unweighted)	83
Figure 3 Gambling behavior of online and non-online monthly gamblers (unweighted).....	85
Figure 4 Gambling problems among online and non-online monthly gamblers (unweighted)....	87
Figure 5 Gambling harms among online and non-online monthly gamblers (unweighted).....	90
Figure 6 Awareness of problem gambling prevention efforts among online and non-online monthly gamblers (unweighted).....	92
Figure 7 Demographic characteristics of online sports and online non-sports monthly gamblers (unweighted)	94
Figure 8 Gambling behavior of online sports bettors and online non-sports bettors (unweighted)	96
Figure 9 Gambling problems among online sports bettors and online non-sports bettors (unweighted)	98
Figure 10 Gambling harms among online sports bettors and online non-sports bettors (unweighted)	99
Figure 11 Awareness of problem gambling prevention efforts among online sports bettors and online non-sports bettors (unweighted).....	101
Figure 12 Demographic characteristics of monthly gamblers under 25 years old (unweighted)	103
Figure 13 Gambling behavior of monthly gamblers aged 18 to 24 (unweighted)	105
Figure 14 Gambling problems among monthly gamblers aged 18 to 24 (unweighted)	106
Figure 15 Gambling harms among monthly gamblers aged 18 to 24 (unweighted)	107
Figure 16 Awareness of problem gambling prevention efforts among monthly gamblers aged 18 to 24 (unweighted)).....	108

Glossary of Terms



Glossary of Terms & Abbreviations

Term	Definition
MGC	Massachusetts Gaming Commission The regulator of racing, casino gambling and sports wagering (except daily fantasy sports) in Massachusetts.
MA	Massachusetts Massachusetts may be referred to as MA in certain instances throughout the report.
Gambling, gaming	This report primarily uses the term ‘gambling’, consistent with scientific research. However, some other stakeholders, including the MGC, use the term ‘gaming’. In instances where the authors quote or reference these stakeholders the term ‘gaming’ is employed.
Gamblers, players, bettors	Those who participate in gambling are variously referred to as gamblers, players, and bettors throughout this report.
Gambling formats/activities	
Mode of access	Mode of accessing gambling, whether online (websites, apps) or in land-based venues. Different from ‘type of activity’.
Type of activity	Type of gambling activity, for example, sports wagering, casino games, poker, lottery, etc., which may be accessed through any ‘mode of access’.
Land-based gambling	Refers to all forms of gambling accessed in physical locations such as casinos, betting shops, racetracks, lottery kiosks, etc.
Online gambling	Refers broadly to the mode of access and may include any activity accessed through websites or mobile apps (e.g., sports wagering, lottery and casino-style games).
Online casino gambling, iGaming	A type of activity conducted online. Refers to casino games accessed online, including slots, table games, and poker. Also referred to as iGaming. This is distinct from other gambling activities accessed online, such as online sports wagering and online lottery.
Online sports wagering/betting	A type of activity conducted online. Refers to placing bets on live sporting events (and possibly novelty bets and/or fantasy sports), via websites or apps.
Skins	In New Jersey, a single online gambling operator may offer multiple ‘skins’ or sub-brands, each with separate website portals; each skin focuses on a different target market of players and customizes the

	products and marketing to this player segment. (Not to be confused with the term 'skins' as used in the video gaming context).
Gambling-like activities	
Online sweepstakes	Online sweepstakes casinos operate under sweepstakes laws, providing casino-style games that you can play using virtual currency to make your wagers.
Daily Fantasy Sports (DFS)	In Daily Fantasy Sports, players compete against each other by building a team of professional athletes under a specified salary cap. Players earn points based on the actual statistical performance of the players in real-world competitions.
Prediction markets	Prediction markets are open markets that enable the prediction of specific outcomes, essentially gambling on real world events.
Gambling markets	
Regulated market	Refers to a jurisdiction that has established a regulatory framework to license and oversee compliance of gambling operators. While this can refer to both land-based and online gambling, the term is most often used in reference to online gambling markets.
Illegal / black market	Refers to a situation where gambling products are offered in a jurisdiction without the requisite licence or authorisation, and where such a licence or authorisation is lawfully required. This can also refer to a situation where the gambling products being offered have been explicitly defined as illegal by the jurisdiction.
Unregulated / gray market	Refers to a situation where the jurisdiction lacks clear, local licensing requirements for the gambling product(s) in question AND has not explicitly defined the gambling product(s) as illegal. Effectively, individuals can engage in these gambling products through unlicensed operators, without any of the legal or regulatory protections that would exist in a regulated market.
Channelization	Refers to efforts that drive (or channel) domestic consumers to a regulated market. This generally refers to consumers who previously gambled through the gray or black market but can apply to new consumers as well as. Achieving a 'high channelization rate' is typically a key objective of newly regulated markets.
Young people	
Young people	Refers to all young people under the age of 25. Includes underage youth and young adults.
Underage youth	Refers to individuals under the legal age to gamble.

Young adults	Refers to individuals between the ages of 21 – 24.
Young players	Refers to individuals between the ages of 21 – 24 who gamble.
Report references and acronyms	
SEIGMA study	<p>Social and Economic Impacts of Gambling in Massachusetts</p> <p>A multi-year research project examining the economic and social impacts of expanded gambling in Massachusetts. Secondary analyses of data from the SEIGMA study were conducted as part of this project.</p>
BGPS	<p>Baseline General Population Survey</p> <p>The Baseline General Population Survey was carried out in Massachusetts in 2013 and 2014.</p>
FGPS (2022)	<p>Follow-up General Population Survey</p> <p>The Follow-up General Population Survey was carried out in Massachusetts in 2021 and 2022.</p>
FOPS (2022)	<p>Follow-up Online Panel Survey</p> <p>One of four online panel surveys which have been carried out in Massachusetts since 2019 when Encore Boston Harbor began operations.</p> <p>The FOPS data used in this study were collected in 2022.</p>
OPS (2023, 2024)	<p>Online Panel Survey</p> <p>Online panel surveys carried out in Massachusetts since 2022.</p> <p>Data from three OPS surveys were used in this study; collected in 2023, Spring of 2024, and Fall of 2024.</p>
PUMS	<p>Public Use Microdata Sample</p> <p>The US Census Bureau provides Public Use Microdata Sample Areas which are non-overlapping, statistical geographic areas that partition each state. These are provided after the completion of the decennial census as part of a program involving the State Data Centers (SDCs).</p> <p>This data was used as part of the secondary analyses of SEIGMA data, to provide comparison rates of certain demographic and behavior items in the online panel surveys with the adult Massachusetts population (18+).</p>
New Jersey (NJ) prevalence reports	Refers to the two NJ prevalence reports (2017, 2023) from which findings were extracted for this study.

NJ player data reports	Refers to the nine player data reports from which findings were extracted for this study, including three sports wagering reports, and six online gambling reports.
Rutgers CGS	<p>Rutgers Center for Gambling Studies</p> <p>A gambling studies center mandated to regularly analyze operator play data, conduct prevalence studies, and lead various prevention, training, and intervention programming in NJ.</p>
DGE	<p>Division of Gaming Enforcement</p> <p>The New Jersey gambling regulator. Helped to establish the Rutgers CGS and its mandate and receives regular reporting.</p>

Executive Summary

Executive Summary

As Massachusetts is considering expanding its current regulated gambling market to include iGaming, the Massachusetts Gaming Commission (MGC) has commissioned this study to examine the potential impact of introducing legal iGaming on public health.

Gambling in MA

Massachusetts currently offers land-based casino gambling through two casinos and one slots venue; sports betting, which launched in land-based venues in January 2023 and online in March 2023; and a state lottery, with online lottery due to launch in 2026. The Massachusetts Gaming Commission (MGC) regulates horserace wagering, casino gambling and sports betting in the Commonwealth. The state lottery, along with charitable gambling including bingo and raffles, is regulated by the Massachusetts Lottery Commission. The Massachusetts Attorney General regulates fantasy sports betting in the Commonwealth. The MGC would regulate iGaming in the event it is legalized.

Purpose of Study

The study examines multiple sources to assess the potential impact of iGaming on public health in the Commonwealth, with particular focus on changes to participation, harms, and impacts on young people under the age of 25. The study is intended to provide the MGC with insight into the public health risks of iGaming, and considerations for policy, regulation, and research that may minimize risk of harm in the event iGaming is legalized in the Commonwealth.

iGaming versus online gambling

This study seeks to understand the impacts of iGaming (online casino gambling) as a distinct activity. However, research to date has typically examined online gambling as a *mode of access*, without distinguishing between *types of activities*. As certain online gambling activities are already legal in the Commonwealth of Massachusetts, findings related to online gambling broadly are of lesser relevance. Rather, to the extent possible, this report prioritizes findings that relate to iGaming individually.

Study Limitations

To date, there is a lack of evidence examining the impacts of the introduction of iGaming in a mature market. Further, there is limited scientific evidence which examines the risks and behaviors associated with iGaming activities in isolation. To address these gaps, the report draws on a mix of methods and sources to provide the best possible guidance to the MGC. The sources described throughout this report include a review of the available scientific evidence, extraction of findings from online gambling data from the state of New Jersey, secondary

analyses of gambling behavior data from the state of Massachusetts, analysis of national gambling policy trends, and qualitative data collection from experts with experience opening gambling markets in the US and Canada. It is hoped that by drawing on this broad range of sources the report offers a rich and broad analysis of the potential impacts of the introduction of iGaming in Massachusetts. However, it is difficult to offer parallelism between sources, particularly of findings from data collected in New Jersey and Massachusetts, which were originally collected for different purposes, using different instruments, sampling, and analytical strategies. This report is intended to bring together a diversity of scientific approaches and perspectives, combined with the authors' experience and expertise in the gambling field, to provide informed insight and recommendations for understanding the potential impact of introducing a regulated iGaming market in Massachusetts.

Research Questions

The study is guided by eight research questions divided into two categories. The research questions were established by the MGC.

Understanding Potential Impacts

1. What are the characteristics of those who participate in iGaming compared with those who participate in other forms of gaming (both online and land-based)?
2. What is the relationship of participation in iGaming with problem gambling, and are there higher levels of risk related to certain types of gambling activities?
3. What populations are at highest risk of gambling-related harms from iGaming?
4. What are the impacts of iGaming on youth under the age of 25?
5. What are the potential public health impacts of iGaming in Massachusetts overall, and specifically for:
 - a. Rates of problem gambling?
 - b. Populations at elevated risk of gambling-related harm?
 - c. Youth under the age of 25?
6. What are the potential public health impacts of iGaming in Massachusetts in the context of the legal landscape in the region?

Considerations for Policy, Regulation, and Research

7. What further avenues of study and/or study methodologies are recommended to add to the current body of research on iGaming, and which methods should be used to engage in these avenues of study?
8. What are responsible gaming (RG) considerations related to iGaming to minimize gambling-related harm, and what kinds of RG initiatives should be considered if iGaming were legalized?

Inputs & Methods

Five key inputs informed answers to the research questions:

1. **Evidence Review** – summarizes the latest scientific evidence on the risks associated with iGaming, the impacts of legalization, and harm minimization approaches.

2. **Policy Review: Surrounding States & National Trends** – establishes the gambling regulatory and policy context in the states surrounding Massachusetts and beyond.
3. **Informant Interviews** – summarizes key learnings from recent shifts to regulated online sports and casino gambling, as described by regulatory and industry experts in New Jersey and Ontario (Canada).
4. **The New Jersey Experience** – provides insight into the real impacts of regulated online casino gambling, based on extraction of findings from prevalence and player data reports published by the New Jersey Division of Gaming Enforcement (DGE).
5. **The Massachusetts Context** – describes the current state of gambling in Massachusetts, including prevalence and vulnerable populations, based on secondary analyses of data and results from the SEIGMA (Social and Economic Impacts of Gambling in Massachusetts) study.

Key Findings: Understanding Potential Impacts

Key findings are summarized for the first six research questions. The final two questions are answered below, in the form of specific recommendations drawn from all five study inputs.

1. What are the characteristics of those who participate in iGaming compared with those who participate in other forms of gaming (both online and land-based)?

Evidence on participation in iGaming specifically is limited. As a mode of access more broadly, evidence and data indicate that those who gamble online tend to be highly involved, i.e., participate in multiple forms of gambling. A mix of variables is associated with online gambling participation, including sociodemographic (younger age, male gender, lower income, identifying as Hispanic or Black), personality (impulsivity), and environmental factors (access to legal gambling). Over time, young adults continue to show the highest increases in online gambling participation, but participation is growing for women and for people who do not identify as White.

2. What is the relationship of participation in iGaming with problem gambling, and are there higher levels of risk related to certain types of gambling activities?

Research consistently shows that participating in any form of online gambling is associated with higher rates of problem gambling. A small number of recent studies suggest iGaming, particularly online slots, may be associated with elevated risk. This may be partly due to its inherent risk as a ‘continuous form’ of gambling, i.e., activities characterized by rapid speed of play. Research has consistently demonstrated that continuous forms of gambling such as EGMs and certain casino games, whether online or land-based, are associated with increased risk. Sports wagering has also been associated with increased risk, which may be partly attributable to the high participation rates of younger males, a population with a high-risk profile. More broadly, research indicates that those who gamble in both online and land-based settings consistently experience the highest rates of gambling problems and harms (followed by online only, followed by land-based only). This aligns with the well-established finding that breadth of involvement is one of the strongest predictors of risk and harm.

3. What populations are at highest risk of gambling-related harms from iGaming?

While there is a lack of evidence to identify populations experiencing harms from iGaming specifically, there is strong evidence that, in general, harm from gambling disproportionately affects young adults and those who are already socioeconomically disadvantaged. Data from Massachusetts indicate young monthly online gamblers (18-24) are more likely than 25+ monthly online gamblers to experience all types of gambling-related harms. Additionally, studies show young people are more likely to experience the most severe harms (suicidality). Those who gamble online (any activity) are also more likely to experience harm than land-based gamblers. New Jersey data show that women and non-White populations show increases in online gambling participation, thus these populations should be monitored for increases in problems and harm.

4. What are the impacts of iGaming on youth under the age of 25?

While the impacts of iGaming on young people specifically have not been thoroughly examined, young adults aged 18-24 are consistently identified as at heightened risk of gambling problems and harms from online gambling, including both sports wagering and casino games. Evidence additionally shows that young people are at greater risk of experiencing the most severe harms from gambling, with gambling problems linked to suicide attempts. Underage youth are also at high risk, especially because they are likely gambling on unregulated sites. The dramatic increase in gambling advertising that typically follows legalization of iGaming increases participation, risk, and harm among underage youth and young adults.

5. What are the potential public health impacts of iGaming in Massachusetts overall

Evidence suggests that legalizing iGaming is likely to lead to increased gambling participation. While impacts on the population-level rate of problem gambling are challenging to predict (discussed below), increased participation can be expected to increase risk and harms which will continue to be disproportionately experienced by vulnerable populations such as young people, non-White populations, and those who are already socioeconomically disadvantaged. Legalization may also increase help-seeking, which may partly be due to consumers becoming more aware of support resources. Without strict guidelines, gambling advertising will become pervasive, with particularly negative impacts to young people and other vulnerable groups. However, a regulated market provides opportunity to reduce and mitigate public health impacts which may already be occurring for those gambling in the illegal market.

a. Rates of problem gambling?

Decades of global population prevalence research suggest overall rates of problem gambling (PG) in the population are not likely to change significantly, regardless of changes to the environment. However, the proliferation of new forms of gambling (both regulated and unregulated) and modes of access in recent years, supported by unprecedented levels of targeted and personalized marketing and promotion have not yet been fully captured in the

published research. In this current context, it is difficult to eliminate the possibility of a population-level increase in PG rates. In addition, data from Massachusetts and New Jersey suggest rates of PG are more likely to increase among certain population groups. Further, as discussed above, population harm, which is a broader concept than problem gambling, is likely to increase.

b. Populations at elevated risk of gambling-related harm?

As is the case for the population generally, increased availability of iGaming will likely increase participation and harms for at-risk populations. This is particularly important as harms are disproportionately concentrated and severe among those who are already disadvantaged. Additionally, the negative impacts of increased advertising have been shown to disproportionately affect those who are at-risk or already experiencing harms. However, a regulated market can more effectively protect at-risk gamblers, for example through adequate age verification, consumer protection measures, economic integrity and stability, and transparency.

c. Youth under the age of 25?

As is the case for the population generally, increased availability of iGaming will likely increase participation and harms for youth under the age of 25. This is particularly important as young people have been shown to be susceptible to the most severe harms. Additionally, the potential impacts of increased advertising are especially significant for young people, as operators are targeting them in increasingly innovative and unenforceable ways (e.g., social media, influencer marketing). However, a regulated market provides opportunity to mitigate some key risks to this group, most importantly through advertising restrictions, robust age verification, and special account limits for younger players.

6. What are the potential public health impacts of iGaming in Massachusetts in the context of the legal landscape in the region?

Two of the five states surrounding Massachusetts offer legal iGaming (CT and RI), with just four licensed operators across both states. The limitations of such a restricted market, as well as geofencing technology that prevents individuals physically located outside a regulated state market to access its licensee platforms, make it unlikely MA residents are experiencing substantial impacts from iGaming markets outside the state.

Considerations for Policy, Regulation & Research

The final two questions are answered in the form of specific recommendations drawn from all five study inputs as well as the authors' collective experience and expertise.

Research Priorities

Six avenues of study are proposed to address the most significant gaps in the current evidence on iGaming. In the event iGaming is legalized in Massachusetts, these areas of research would be vital in supporting a harm minimization approach.

1. Monitor play behavior trends
Player data is an essential source of evidence and a powerful tool for transparency with operators. Preparing such data for analysis requires specialized knowledge, infrastructure, and procedures to host player data securely and to manage access for internal or external researchers.
2. Distinguish impact of different online gambling activities
To date, most research has treated online gambling as a single behaviour, making it difficult for policy makers to distinguish the player profiles, risks, and other impacts of different activities, particularly between sports wagering and online casino gambling.
3. Monitor changes in early intervention and treatment
This could involve establishing research to monitor and study changes in helpline calls and treatment seeking, including primary reasons for help-seeking in terms of motivations (self, partner, other family, workplace) and forms of gambling that were most problematic.
4. Establish a research program on youth and young adults
The distinct vulnerabilities, behaviors, and risk profiles of both underage youth and young adults make it essential to better understand impacts and to inform prevention, treatment, and regulatory approaches targeting these population groups.
5. Include longitudinal, cohort research design
Massachusetts has conducted world-leading longitudinal research on the impact of introducing land-based casinos, including multi-year cohort research which is the gold standard for understanding the impact of changes in the gambling environment. Should Massachusetts introduce regulated iGaming, longitudinal research, including examining sub-populations most vulnerable to harm, should be undertaken.
6. Develop an evaluation framework to guide operator reporting
While evaluation is a key element of a public health approach, it is rarely undertaken effectively, if at all. Establishing a framework for evaluation will improve the way impact is measured and the value of the reporting to policy makers.

Key Considerations & Policy Recommendations

Twelve recommendations are proposed across five key principles:

- Make harm minimization the foundation of regulation
- Ensure multiple levels of protections
- Maximize economic development to support public health
- Maximize channelization to achieve objectives
- Ensure adequate enforcement to support objectives

While certain recommendations may appear beyond the scope of responsible gambling, they are all essential to implementing and maintaining a regulatory framework for iGaming that would effectively minimize harm to players and the wider community.

<i>Make harm minimization the foundation of regulation</i>	
1. Establish harm minimization as the primary objective of legalization	
This implies an expanded mandate that can effectively reduce public health impacts to the population, specifically by: (1) protecting the wider Commonwealth population (i.e., not just gamblers); (2) driving economic development for the explicit purposes of minimizing harm and generating benefits to the community; and (3) actively monitoring and reducing the unregulated (illegal) market, where harms will continue to occur.	
2. Harmonize protections across all online gambling activities	
Massachusetts currently offers legal online sports wagering and will introduce online lottery in 2026. As demonstrated throughout the report, all types of online gambling carry increased risk. To effectively mitigate impacts to public health, it would be important to extend the goal of harm minimization to other types of online gambling and harmonize principles and protections across the regulatory frameworks of iGaming, online sports, and online lottery.	
<i>Ensure multiple levels of protections</i>	
3. Protect the population	
a. Establish rigorous advertising restrictions	
Without robust restrictions, gambling advertising will increase following legalization, as seen in other US states and beyond. Excessive advertising overexposes everyone to gambling, including underage youth and at-risk populations. It will be important to establish strict, strategic advertising guidelines from the outset to avoid the challenges currently facing many global jurisdictions that act to restrict advertising after it has become a public health issue.	
b. Expand MGC’s research program to monitor population public health impacts	
This includes an internal/external research program that is harmonized with the research recommendations (see above) and includes collaboration between the regulator, other state agencies (i.e., Attorney General, Department of Public Health), one or more academic research hubs, and licensed operators. The primary activities of this collaboration would include conducting regular population prevalence research and analyzing operator-submitted player data annually to monitor changes in participation and behaviors post-legalization. Other mechanisms should include community-based research and a forum for lived experience.	
4. Protect underage youth	

Underage youth are likely already experiencing harms from gambling. Unfortunately, regulatory frameworks often neglect to address this vulnerable group. With an expanded mandate focused primarily on harm minimization, an iGaming framework should include strict requirements for protecting underage youth from excessive exposure to gambling as well as from illegal participation.

- a. Address digital advertising methods that implicitly target young people
- b. Monitor and reduce illegal underage gambling

5. Protect players and their families

Protecting players is one of the central purposes of a regulatory framework. However, to effectively mitigate impacts to the population, in addition to more conventional approaches to minimize harm to players, it would be important to implement protections which consider families and loved ones. This is particularly crucial for online gambling where technology facilitates concealment of gambling and related harm from family (Crystal, 2019).

- a. Establish an industry-leading set of requirements for player protection tools that builds on land-based tools such as PlayMyWay
- b. Establish industry-leading requirements for player monitoring and interaction, potentially including an expanded role for GameSense advisors in player interactions.
- c. Implement evidence-based requirements and initiatives to limit financial harm
- d. Implement evidence-based requirements and initiatives to limit harm to families and affected others, including an accessible family exclusion process.

6. Protect young players

Young players, generally considered those aged under 25, are at an increased risk for gambling problems and harms. In addition to the protections in place for all players, an iGaming regulatory framework should consider targeted protections for this higher risk group.

- a. Establish targeted account-based limits
- b. Limit cross-promotion of gambling activities

7. Prepare for increases in help-seeking

Should iGaming be legalized, it is expected that help-seeking will increase post-launch. This may be the result of a combination of increased participation and harm, as well as greater awareness of resources.

- a. Ensure support resources are promoted, including in all advertising and platforms
- b. Ensure there is capacity for increases in treatment seeking
- c. Monitor and report on impacts

Maximize economic development to support public health

8. Establish taxation suited to MA's needs and expectations

Approaches to taxation of online gambling are highly varied and dynamic across global jurisdictions. While certain benchmarks exist, it would be in the best interest of the Commonwealth to determine its own rate based on its unique needs and expectations.

9. Generate economic benefits for the community

The non-physical nature and vertically disintegrated model of iGaming are less conducive to certain economic development objectives such as local investment and employment. To maximize economic benefits to the community, it would be important to impose thoughtful requirements that prioritize local businesses.

Maximize channelization to achieve all objectives

10. Make the gray market black

A key factor in achieving a high channelization rate is reducing (or eliminating) the unregulated market. Legalizing iGaming and establishing a regulatory framework will not in itself eliminate the unregulated market. It will be important to make it explicit that unregulated operators offering iGaming are operating illegally, and to implement strong monitoring and enforcement mechanisms to support the legal market and reduce illegal gambling.

Enable adequate enforcement to support all objectives

11. Ensure adequate resources and capacity for enforcement

In addition to the normal tools that enable regulators to monitor and enforce compliance among licensed operators, it is important that the legislative and regulatory framework additionally empowers the regulator, in collaboration with law enforcement bodies, to pursue and take action on the unregulated market.

12. Work towards collaborative enforcement

Online forms of gambling are not physically confined to any state or jurisdiction, which makes them more challenging to regulate entirely through conventional state-level methods. Collaboration with agencies in other states and the federal government is needed to effectively tackle enforcement, particularly for preventing access to illegal operators and restricting advertising, including social media and influencer advertising which occur on online platforms that are immune to state laws.

Conclusion

This research report brings together findings from five sources to inform the consideration of legalizing iGaming in Massachusetts. This research project has illustrated the complexity of such a decision. It is clear that legalization of a new gambling activity will likely lead to increased participation, and with that, harms, which are disproportionately experienced by young people and other socio-economically disadvantaged populations. On the other hand, a regulated market does provide opportunities to address public health issues which are likely already occurring, such as underage gambling, unprotected gambling, and unregulated advertising.

Following a trend towards opening new gambling markets, no new legislation to expand gambling has passed in any US state in 2024 and 2025 (as of December 2025). This may be due to a combination of unmet economic expectations and growing evidence and concerns related to impacts on public health. Additionally, the excessive levels of advertising which have followed legalization in markets worldwide have created widespread alarm and dismay.

This report examines these and other implications of legalizing iGaming in Massachusetts and proposes policies and considerations that would minimize negative impacts to public health while maximizing the economic benefits to the Commonwealth. It is hoped the findings and recommendations will support policy makers in their deliberations on these important issues.

Introduction



Introduction

As Massachusetts is considering expanding its current regulated gambling market to include iGaming, the Massachusetts Gaming Commission (MGC) has commissioned this study to examine the potential impacts on public health, as well as the key considerations for policy, regulation, and research in the event iGaming is legalized.

Gambling in Massachusetts

Massachusetts currently offers land-based casino gambling through two casinos and one slots venue; sports betting, which launched in land-based venues in January 2023 and online in March 2023; and a state lottery, with online lottery due to launch in 2026. The Massachusetts Gaming Commission (MGC) regulates horserace wagering, casino gambling and sports betting in the Commonwealth. The state lottery, along with charitable gambling including bingo and raffles, is regulated by the Massachusetts Lottery Commission. The Massachusetts Attorney General regulates fantasy sports betting in the Commonwealth. The MGC would regulate iGaming in the event it is legalized.

Purpose of Study

The study examines multiple sources to assess the potential impact of iGaming on public health in the Commonwealth, with particular focus on changes to participation, harms, and impacts on young people under the age of 25. The study is intended to provide the Massachusetts Gaming Commission with insight into the population and public health risks of iGaming, as well as the considerations for policy, regulation, and research that may minimize risk of harm in the event iGaming is legalized in the Commonwealth.

iGaming versus online gambling

This study seeks to understand the impacts of iGaming (online casino gambling) as a distinct activity. However, research to date has typically examined online gambling as a *mode of access*, without distinguishing between *types of activities*. As certain online gambling activities are already legal in the Commonwealth of Massachusetts, findings related to online gambling broadly are of lesser relevance. Rather, to the extent possible, this report prioritizes findings that relate to iGaming individually.

Study Limitations

To date, there is a lack of evidence examining the impacts of the introduction of iGaming in a mature market. Further, there is limited scientific evidence which examines the risks and behaviors associated with iGaming in isolation. To address these gaps, the report draws on a

mix of methods and sources to provide the best possible guidance to the MGC. The sources described throughout this report include a review of the available scientific evidence, extraction of findings from online gambling reports from the state of New Jersey, secondary analyses of gambling behavior data from the state of Massachusetts, analysis of national gambling policy trends, and qualitative data collection from experts with experience opening gambling markets in the US and Canada.

It is hoped that by drawing on this broad range of sources the report offers a rich and broad analysis of the potential impacts of the introduction of iGaming in Massachusetts. However, it is difficult to offer parallelism between sources, particularly of findings from data collected in New Jersey and Massachusetts, which were originally collected for different purposes, using different instruments, sampling, and analytical strategies.

This report is intended to bring together a diversity of scientific approaches and perspectives, combined with the authors' experience and expertise in the gambling field, to provide informed insight and recommendations for understanding the potential impact of introducing a regulated iGaming market in Massachusetts.

Research Questions

The MGC established eight research questions to be answered through the study. The questions are divided into two categories.

Understanding Potential Impacts

The study answers six questions to understand the potential impacts of iGaming on public health in Massachusetts:

1. What are the characteristics of those who participate in iGaming compared with those who participate in other forms of gaming (both online and land-based)?
2. What is the relationship of participation in iGaming with problem gambling, and are there higher levels of risk related to certain types of gambling activities?
3. What populations are at highest risk of gambling-related harms from iGaming?
4. What are the impacts of iGaming on youth under the age of 25?
5. What are the potential public health impacts of iGaming in Massachusetts overall, and specifically for:
 - a. Rates of problem gambling?
 - b. Populations at elevated risk of gambling-related harm?
 - c. Youth under the age of 25?
6. What are the potential public health impacts of iGaming in Massachusetts in the context of the legal landscape in the region (for example, types of gambling legal in neighboring states)?

Considerations for Policy, Regulation, and Research

The study answers two additional questions to identify important considerations for policy, regulation, and research to minimize risk of harm in the event iGaming is legalized:

7. What further avenues of study and/or study methodologies (for example, assessing gambling-related harm using player data) are recommended to add to the current body of research on iGaming, and which methods should be used to engage in these avenues of study?
8. What are responsible gaming considerations related to iGaming to minimize gambling-related harm, and what kinds of responsible gambling initiatives (including programming, regulatory, monitoring, and enforcement considerations) should be considered if iGaming were legalized?

Report Structure

The report is organized into three main sections:

- Methodology – describes the five study inputs and methods for each
- Key Findings – presents the project findings organized according to the five study inputs
- Discussion & Policy Recommendations – answers the eight research questions based on all the study's findings

Methodology



Methodology

Five key inputs informed answers to the research questions:

1. **Rapid Evidence Review** – summarizes the scientific evidence on the risks associated with iGaming, the implications of legalization, and harm minimization approaches.
2. **Policy Review: Surrounding States & National Trends** – establishes the gambling regulatory and policy context in the states surrounding Massachusetts and beyond.
3. **Informant Interviews** – summarizes key learnings from recent shifts to regulated online sports and casino gambling, as described by regulatory and industry experts in New Jersey and Ontario (Canada).
4. **The New Jersey Experience** – provides insight into the real impacts of regulated online casino gambling, based on extraction of findings from prevalence and player data reports published by New Jersey’s Division of Gaming Enforcement (DGE).
5. **The Massachusetts Context** – describes the current state of gambling in Massachusetts, including prevalence rates and vulnerable populations, based on secondary analyses of data from the SEIGMA (Social and Economic Impacts of Gambling in Massachusetts) study.

Methods used for each input are described below. A matrix listing the eight research questions and their respective methods is included as Table 4 at the end of the section.

Rapid Evidence Review

There is limited published evidence to date that examines online casino gambling in isolation. While there is a large body of research which addresses online gambling as a mode of access, and even online sports betting as an activity, the value of this evidence is limited for the current study. The commissioned study seeks to understand the potential impacts associated with online casino gambling as a distinct activity, as Massachusetts already regulates an online gambling market which has offered online sports betting since 2023 and will introduce online lottery in 2026. To help accommodate this limitation, the evidence review followed an approach outlined by Grant & Booth (2009) and Haby et al. (2016, 2024) for a rapid review of evidence, using abbreviated systematic review methods to address complex questions. The design is intended to enable evidence-informed decision-making, conducted with the needs of the decision-maker in mind.

The available evidence contributed to understanding seven of the eight research questions, specifically:

- The characteristics of those who participate in iGaming (Q1).
- The relationship of participation in iGaming with problem gambling, and whether certain activities are associated with higher levels of risk (Q2).
- Populations at highest risk of harm from iGaming (Q3).
- A small number of studies on the impacts observed following the legalization of new forms of gambling in global jurisdictions can help anticipate *potential* impacts of introducing a new form in Massachusetts (Q5, Q6).

- Studies examining harm minimization approaches helped guide the research and regulatory recommendations that could support expansion in Massachusetts (Q7, Q8).

Limitations

As well as the key limitation related to the breadth of available evidence on the topic of interest, there are limitations to the rapid review method. As discussed by Haby et al. (2022), while rapid reviews are widely used and useful, certain methods employed can create the risk of bias in the results. Efforts have been made to mitigate these risks by searching multiple databases, by searching for select search terms in articles' metadata as well as the abstracts, and by involving more than one reviewer in the identification, screening and extraction stages. Additionally, the authors are transparent in their use of rapid review methods and acknowledge their limitations.

Search Strategy

The research team searched three scientific databases for the latest evidence on three topics:

- Risks associated with online casino gambling
- Implications of legalizing new forms of gambling
- Effective approaches and strategies for reducing and preventing gambling harm

To identify, screen, and finalize the set of peer-reviewed publications to examine, the PRISMA 2020 protocol (Page et al., 2021) was used. Three databases were included in the search – APA PsycInfo, PubMed, and ProQuest.

Identification

After testing searches with different combinations of search terms, the key words below were used. The search was conducted on November 3, 2025. Identified articles were recorded in Mendeley Reference Manager organized into three individual folders by query.

Query 1: Risks associated with online casino gambling

(online gambling OR online casino OR online slots OR online electronic gambling machines OR gambling forms OR gambling products OR gambling types) AND (risk OR harm OR problem) AND (youth OR adolescents OR young adults)

Query 2: Implications of legalizing new forms of gambling

(online gambling OR online casino OR online slots OR online electronic gambling machines) AND (impacts OR risks OR harms OR problems) AND (legalization OR regulated OR unregulated OR offshore OR unlicensed OR illegal)

Query 3: Effective approaches and strategies for reducing and preventing gambling harm

(gambling OR online gambling OR online casino) AND (reduce OR prevent) AND (risk OR harm OR problems) AND (approaches OR strategies OR initiatives)

The searches resulted in 1,535 articles. A preliminary screen was conducted to eliminate duplicates, first within folders for each of the three queries, and then across all three folders – this resulted in the removal of 429 records, leaving 1,106 records. The preliminary screen was

followed by a review of article title, date, and source to remove incomplete records, older records, publications that were not peer reviewed, books, non-research publications (e.g., opinion, commentary), publications issued as corrections, and studies conducted in excluded jurisdictions – this resulted in the removal of 510 articles. The 596 remaining article titles and abstracts were screened according to the criteria below.

Screening

Titles and abstracts for the 596 articles were reviewed according to the following screening criteria. General criteria were used to screen all articles, with further criteria for each query.

All queries

- Studies published prior to 2015 were excluded
- Studies conducted in jurisdictions outside North America, Europe, UK, and Australia were excluded

Query 1: Risks associated with iGaming

- Studies which did not examine differences across forms of gambling and/or online casino gambling in isolation were excluded
- Studies which did not examine the risks or harms associated with online casino gambling, or the characteristics of participants, were excluded

Query 2: Implications of legalizing new forms of gambling

- Studies which did not compare behaviours pre and post legalization of a new form of gambling (e.g., comparisons of jurisdictions with different legal offerings) were excluded

Query 3: Effective approaches and strategies for reducing and preventing gambling harm

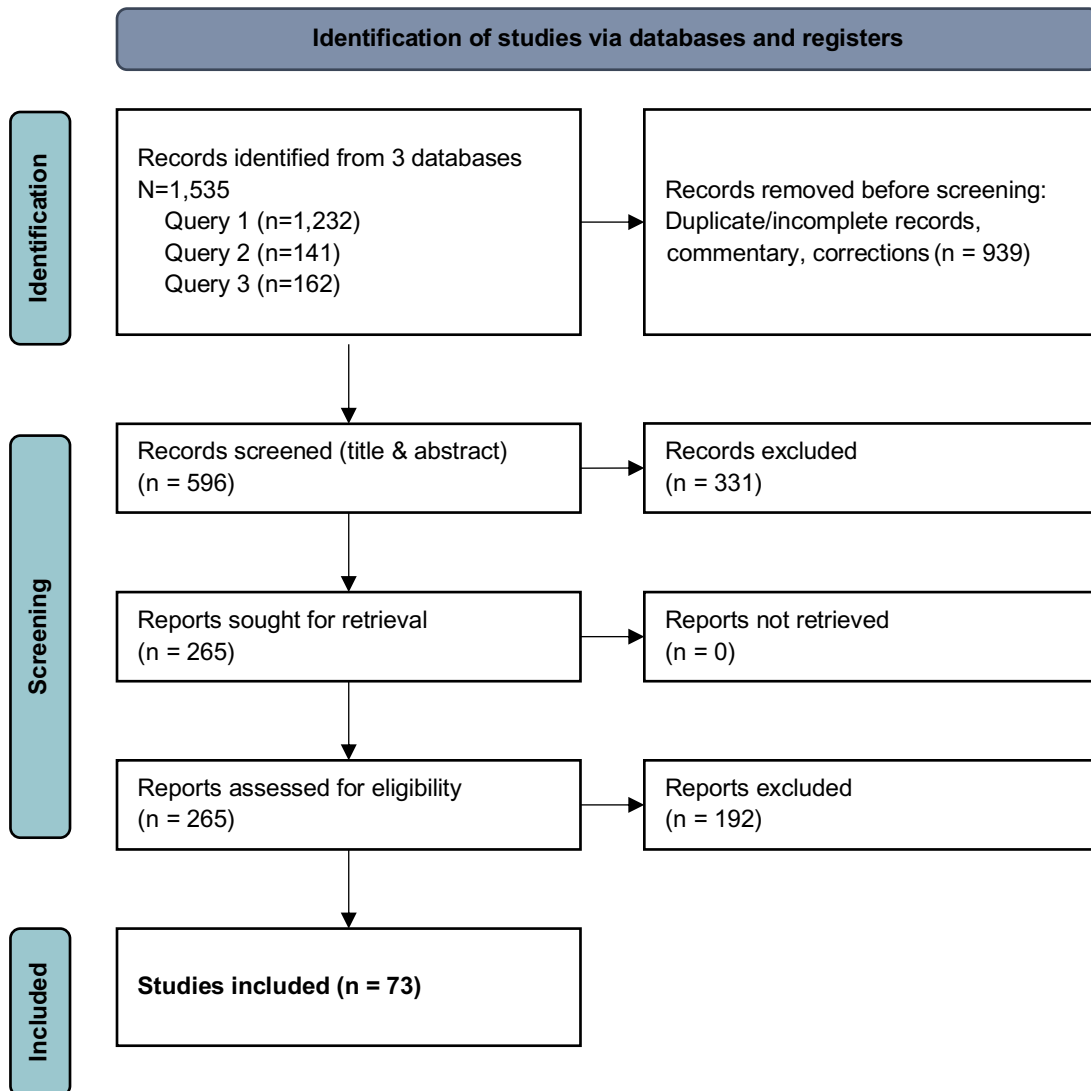
- Studies which did not examine effectiveness of approaches (e.g., analyses of the availability of tools, player attitudes towards interventions, etc.) were excluded
- Studies limited to tertiary or treatment interventions were excluded

A further 331 articles were excluded following screening of titles and abstracts. The remaining 265 articles were retrieved, and full texts were reviewed and assessed in further detail – this resulted in the removal of an additional 192 articles. The 73 remaining articles were selected for inclusion.

Extraction

The 73 included articles were downloaded and reviewed by two members of the research team for themes and findings related to the three topics.

Figure 1 PRISMA Protocol of Systematic Review



Policy Review: Surrounding States & National Trends

The policy review examined the five states bordering Massachusetts to provide an overview of legal gambling offerings and harm minimization policy and regulations. The review additionally examined national trends related to the expansion of gambling markets in the US. The findings from the Policy Review help to establish the legal landscape in the region, and how those environments could impact public health in Massachusetts (Q6). Additionally, surrounding states' harm minimization efforts, as well as broader national regulatory trends, help inform research and regulatory recommendations in the event of expansion in Massachusetts (Q7, Q8). A combination of gray literature sources including government, agency, and industry web pages, news stories, and reports was included in the policy review.

Informant Interviews

Four in-depth interviews were conducted with three former regulators and one industry association leader to understand the experience and key learnings from opening online gambling markets in New Jersey, USA and Ontario, Canada. The learnings from the interviews provide direct experience and insight to help inform research and regulatory recommendations in the event of expansion in Massachusetts (Q7, Q8).

Experts were asked to describe:

- Primary drivers for market opening
- Policy objectives, with specific prompts for the role of any of the following topics:
 - Channelization and consumer protection
 - Unregulated market
 - Economic development
- Consultation process
- Regulatory design, with specific prompts for the role of any of the following topics:
 - Consumer protection measures
 - Advertising
 - Youth
 - Research, monitoring, and evaluation
 - Unregulated market
- Unanticipated issues, challenges or successes
- Key learnings and recommended actions for policy, programming, research, regulatory approach, monitoring, and enforcement

Interviews were conducted and recorded via Zoom. Transcriptions were produced using SONIX, an AI powered transcription and translation software, and reviewed multiple times for accuracy. Transcripts were analyzed for themes related to the research questions. For several key issues, additional research was conducted to contextualize the interview contributions and recommendations, as well as to provide a more comprehensive understanding of the two jurisdictions.

Limitations

Informant interviews are inherently subjective as participants offer their personal viewpoints, which are potentially skewed by their role, the organization for which they work, and the desire to present a favorable perspective. By interviewing three former regulators and one industry leader and inviting them to reflect on lessons learned to provide advice for another jurisdiction, we sought to reduce social desirability bias and obtain their most honest insights. The report is also transparent about the roles of the key informants and the potential bias each brought to the discussion.

The New Jersey Experience

New Jersey was an early entrant into regulated iGaming and accounts for approximately one third of national revenue among those US states that offer iGaming. New Jersey established and required industry to fund yearly reports, commissioned by the state gambling regulator, the Division of Gaming Enforcement (DGE). Since 2014, those reports have been prepared by the Center for Gambling Studies (CGS) at Rutgers University. The purpose of the reports is to statistically analyze every bet placed for iGaming in the state of New Jersey (since 2014) and sports wagering (since 2018) and to provide policy recommendations to regulators based on ongoing trends. In addition, the CGS has conducted two statewide prevalence studies to contextualize the big data findings relative to problem gambling, comorbidity, and sociodemographic considerations.

The research team reviewed prevalence and player data reports conducted between 2016 and 2023 and extracted key findings relevant to the research questions. The extracted findings provide insight into:

- Characteristics of those who participate in iGaming (Q1)
- The relationship of participation in iGaming with problem gambling, and whether certain activities are associated with higher levels of risk (Q2)
- Populations at highest risk of harm from iGaming (Q3)
- Impacts of iGaming on youth under the age of 25 (Q4)

Additionally, as a jurisdiction with a mature online casino market, findings from New Jersey can help anticipate *potential* impacts of introducing this form of gambling in Massachusetts (Q5, Q6). Finally, discussion of New Jersey's initiatives such as the DGE-CGS research collaboration, and findings related to the use of responsible gambling tools are useful to guide research and regulatory recommendations that could support expansion in Massachusetts (Q7, Q8).

Information for this report was extracted from analytical findings from the following reports:

- Prevalence studies – conducted in in 2016 (Nower et al., 2017) and 2021 (Nower et al., 2023)
- Player data reports (online gambling) – data collected annually from 2016 through 2021 (Nower, 2015; Nower, Cho, et al., 2019, 2020b, 2020a; Nower et al., 2018, 2024a)
- Player data reports (sports betting) – data collected annually from 2019 through 2021 (Nower et al., 2024b; Nower, Stanmyre, et al., 2019, 2020)

Methods used to review and extract findings for this study, as well as summaries of the methods employed to develop the original reports are described below. Detailed methodologies for each study can be accessed in the previously-published reports which are detailed in References.

Review and Extraction

The 11 New Jersey reports were reviewed by their lead author and findings of interest were extracted and summarized according to key topics relevant to this report. Across all 11 reports, where possible, analyses were extracted by age to provide insights for those aged under 25.

Limitations

It is important to note that comparisons made within this report are for the purposes of this project, and not intended to suggest analytic parity across the source findings, given that the objectives and methodology of the source reports necessarily differ considerably. In addition, we are required to use each report as published on its face, without access to additional data, analyses or information that was not vetted by the regulators.

Source Study Methods

Summaries of the methodologies used for each of the study types are included below. The reports were written as policy documents in keeping with the direction of the Division of Gaming Enforcement (DGE) and are intended primarily for the general public and regulators.

Population Prevalence Studies

The Rutgers Center for Gambling Studies (CGS) has conducted and published two prevalence studies in New Jersey, one following the legalization of iGaming (in 2014) and another following the legalization of sports wagering (in 2018). Data was collected in 2016 and 2021. Both studies used a dual-sampling frame: (1) a computer-assisted telephone survey, administered to a random sample from a random-digit dialing pool (landlines and mobile phones), and (2) an online survey administered to a random sample of online panelists. Detailed information regarding the sampling strategies is registered at OSF through https://osf.io/qxgkw?view_only=46a480267322446fb0037a02f05e6c87.

Problem gambling was assessed using the Problem Gambling Severity Index (PGSI), a 9-item problem gambling severity measure that classifies individuals who gamble as low (1-2 symptoms) medium (3-7 symptoms), or high-risk (8+ symptoms) for gambling problems. Post-hoc survey weights were developed to account for sampling deviation from age, gender, race, and ethnicity distributions based on state census data and applied separately to the telephone and online samples. All inferential statistical analyses accounted for complex survey design and dual-sampling frame using the survey weights.

Surveyed gambling activities

The survey included a range of gambling and gambling-like activities, including Lottery, instant scratch-off tickets, gaming machines (slots, video poker) games of skill, bingo, high-risk stock trading, live casino table games, cryptocurrency trading, sports wagering, horse racetrack or off

track betting, season-long fantasy sports, live poker or tournament poker, esports wagering, daily fantasy sports, keno.

Player Data Reports

The Rutgers CGS analyzes play-by-play data from all operators in New Jersey. The aims of the analyses are: 1) to explore gambling activities by demographic and other variables that bear on problem gambling (e.g., age, gender, geographic area, time of day); 2) to investigate evidence-based indicators of high-intensity play; 3) to evaluate the utilization patterns of RG features; and 4) to provide recommendations to reduce problem gambling behavior and related harm.

The New Jersey Division of Gaming Enforcement (DGE), through an encrypted portal, provided the Rutgers CGS with multiple raw data files, collected from all operators in a standardized variable format.

Once the files were extracted from their compressed format, each text data file was read into SPSS. The length and data format of all variables were standardized across all files from all operators. Demographic files, individual bet files, financial files, and responsible gambling (RG) features files were sorted by a unique player identification code and time/data stamp variable. Individual bet files from all skins¹ were combined into a single file, containing all bets across all skins by all players for analyses. The data was cleaned again and analyzed for missing or erroneous data, and questionable data was checked with the DGE for verification and/or correction. The resulting file was then matched to demographic, financial, and RG feature files by identifier and aggregated.

Univariate and bivariate statistics were used to analyze daily player betting behavior across all skins, sports, types of bets and counties, as well as by time of day and patterns of play, comparing those who did and did not opt to use RG features.

The Massachusetts Context

To understand the context for potential gambling expansion in Massachusetts, the research team conducted new analyses of data from online panel surveys which were conducted in the years 2022, 2023 and 2024 as part of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) research.

The secondary analyses were designed to answer the research questions, specifically by:

- Comparing online sports bettors vs. online non-sports gamblers to provide insight into the characteristics of Massachusetts gamblers who may participate in iGaming, and the risk and harms they experience (Q1, Q2, Q3).
- Understanding the risk factors and vulnerable populations observed in Massachusetts to date, to help anticipate *potential* impacts of introducing a new form of gambling in the state (Q5, Q6).

¹ New Jersey operators can maintain multiple brands and websites, or “skins,” targeted at different segments of the online market.

- Identifying vulnerable groups, establishing individuals' awareness of prevention efforts, and other key findings are useful to guide research and regulatory recommendations that could support expansion in Massachusetts (Q7, Q8).

Methods used to conduct secondary analyses for this study, as well as summaries of the methods employed to conduct the source online panel surveys are described below. Detailed methodologies for each survey can be accessed in the previously-published reports.

Secondary Analyses

Analyses examined differences between *regular gamblers who gamble online* compared with *regular gamblers who do not gamble online*. Additional analyses were conducted among regular gamblers who gamble online, to examine the differences between those who do or do not gamble on sports. Among those who gamble online on activities other than sports, it was not possible to isolate those who gamble on casino games. However, it was one of the activities included in the list. As such, these analyses are intended to provide insight into the characteristics of those who participate in iGaming compared with those who participate in other forms of online gambling such as sports wagering and lottery.

The secondary analyses examined (all analyses are year over year):

- Demographic characteristics
- Gambling behavior
- Gambling problems and harms
- Prevention awareness, specifically of:
 - Helpline
 - Low risk gambling guidelines
 - Self-exclusion

Analysis of the online panel data is focused on the subset of panelists who gambled monthly or more often in the past year after eliminating a small number of panelists in each survey with the same IP address as a panelist in the previous survey. This focus is intended to maintain the independence of the samples in each year.² Table 1 presents information about the size of the overall samples from each survey, the impact of removing duplicate IP addresses, and the number and proportion of monthly gamblers in each of the online panels.

Table 1. Online panel samples for analysis

Online Panel	Overall Sample	After Removing Duplicates	%	Gambled Monthly or More	%
FOPS 2022	3038	3038	100	1631	53.7
OPS23 2023	3380	3215	95.1	1866	58.0

² In total, 165 panelists were eliminated from the 2023 survey, 142 panelists from the Spring 2024 survey, and 239 panelists from the Fall 2024 survey. While an analysis of within-person changes across years in these groups would be interesting, such an exercise is beyond the scope of the present study.

OPS24-Spring	3383	3241	95.8	1916	59.1
OPS24-Fall	3045	2806	92.1	1577	56.2

Analyses of the online panel survey data aim to elucidate differences between *regular gamblers who gamble online* compared with *regular gamblers who do not gamble online*. As Table 1 above shows, those who gamble at least monthly represent more than half of the total sample in each of the online panels, providing a rich source of *regular gamblers* to understand specific gambling behaviours such as iGaming.

To provide context for the findings, it is helpful to compare the monthly gamblers in the online panels with characteristics of the general population.³ To do this, we compared key demographic characteristics of the monthly gamblers in each panel with 2023 PUMS (Public Use Microdata Sample) data.⁴ Compared to the adult population in Massachusetts, monthly gamblers in the panels were more likely to be male, more likely to be under the age of 35, more likely to be Hispanic or Black and less likely to be Asian, more likely to have obtained some college education, and less likely to have annual household incomes of \$50,000 or more.

Limitations

It is important to note that sports wagering was the only legal online activity at the time of the SEIGMA surveys, which suggests a portion of the subgroup gambling on other activities online were doing so on unlicensed sites. This is notable for interpreting findings related to these gamblers, as some evidence suggests those who engage in unlicensed gambling may be higher risk (see discussion in Evidence Review). However, a recent study found that up to 50% of gamblers using unlicensed sites were not aware they were gambling illegally (Hing et al., 2021). It is impossible to know whether the subgroup examined in these analyses knowingly participated in unlicensed gambling, however the interpretation of the reported findings takes this limitation into account.

Source Study Methods

Summaries of the methods employed in the source studies are described below. Detailed methodologies for each study can be accessed in the previously-published reports.

Online Panel Surveys in Massachusetts, 2022-2024

Four online panel surveys have been carried out in Massachusetts since 2019 when Encore Boston Harbor began operations. The Follow-up Online Panel Survey (FOPS) was fielded in 2022 simultaneously with the Follow-up General Population Survey (FGPS). The next Online Panel Survey (OPS23) was fielded one year after the FOPS in 2023. Another online panel

³ Since the OPS data are not generalizable to the MA adult population, post-stratification weights have not been created for these data.

⁴ Public Use Microdata Sample (PUMS) files are anonymized detailed datasets about individual people or housing units, provided by The Census Bureau from the American Community Survey (ACS).

survey was fielded in March 2024, and a fourth online panel survey was completed in December 2024.⁵

Ethics approval was obtained for all these surveys from the University of Massachusetts Institutional Review Board (IRB# 175 2013-1709). The review ensured that privacy was protected, informed consent was obtained, and safeguards were in place to protect the data.

Recruitment & Sample

All four of the SEIGMA online panel surveys were conducted by Qualtrics. Qualtrics maintains an online panel of individuals who have agreed to participate in research studies in return for small incentives and have provided demographic information about themselves. In each survey, this information was used to recruit a sample of Massachusetts adults (18+) with quotas established for age and gender but with no limitation by region, with the exception of the FOPS. The FOPS was fielded in March 2022, OPS23 was fielded in March 2023, OPS24-Spring was fielded in March-April 2024 and OPS24-Fall was fielded in October-December 2024.

Limitation of Online Panels

Online panels consist of groups of people who choose to participate in online surveys in return for compensation. The advantages of online panel surveys are that: (a) the validity of answers to 'sensitive questions' (e.g., gambling behavior) tends to be higher in self-administered formats (Tourangeau & Smith, 1996; van der Heijden et al., 2000); (b) everyone has agreed and expects to be contacted (unlike population surveys); (c) the results can be obtained in a much shorter period of time; and (d) they are much less expensive than surveys utilizing probability sampling (Olson et al., 2021).

The main limitation of online panels is that panelists are not randomly selected but have volunteered to participate in numerous surveys. While online panel companies generally stratify their samples to be demographically representative of the population, significant behavioral biases typically remain that cannot be corrected by this stratification or by demographic weighting (Pickering & Blaszczyński, 2021; Williams et al., 2013). One obvious issue is that a non-random minority of people do not use the Internet and thus are not eligible to be part of an online panel. An additional consistent finding is that online panel members tend to have much higher levels of pathology than are found in the general population, including overall rates of substance use, mental health problems, gambling involvement, and addictions.

While online panels cannot be used to estimate population prevalence rates, it is reasonable to assume that changes in the behavior of online panelists do reflect changes in how heavy gamblers in the general population are behaving. Thus, online panels hold considerable value as a means to identify the **direction of changes** in gambling-related attitudes, behaviors, and harms on a regular basis. Fielding annual online panel surveys is a time- and cost-effective way

⁵ The most recent online panel survey was fielded in late 2024 to provide the MGC with up-to-date surveillance information in the event that the current SEIGMA research team was unsuccessful in competing for a re-procurement of the project in 2025.

of conducting regular surveillance and providing regulators and policymakers with crucial information to target gambling harm mitigation strategies.

Measuring Problem Gambling in Massachusetts

Many instruments exist for the population assessment of problem gambling. Internationally, the most commonly used instruments are the South Oaks Gambling Screen (SOGS) (Lesieur & Blume, 1987), the Problem Gambling Severity Index (PGSI) (Ferris & Wynne, 2001), and various scales based on the DSM (Diagnostic and Statistical Manual of Mental Disorders) diagnostic criteria for pathological gambling, e.g., (Fisher, 2000; Gerstein et al., 1999; Kessler et al., 2008; Petry et al., 2005). In Massachusetts, the Problem and Pathological Gambling Measure (PPGM) (Williams & Volberg, 2014) has served as the primary instrument to assess problem gambling in all of the SEIGMA surveys.

The PPGM is a 14-item assessment instrument with questions organized into three sections: *Problems*, *Impaired Control*, and *Other Issues*. The instrument employs a 12-month timeframe and recognizes a continuum of gambling across four categories (*Recreational*, *At-Risk*, *Problem*, and *Pathological*). In contrast to other problem gambling instruments, in which any pattern of item endorsement that results in a score above a certain threshold is sufficient to be designated as a problem gambler, the PPGM requires endorsement of one or more items from the *Problems* section and one or more items from the *Impaired Control* section to classify an individual as a **Problem Gambler**. Endorsement of a *Problem* or *Impaired Control* item, but not both, typically leads to classification as an **At-Risk Gambler**. Gamblers who do not meet the criteria for *At-Risk*, *Problem*, or *Pathological Gambler* are deemed to be **Recreational Gamblers**. Table 2 presents the PPGM typologies, and the criteria required for classification across these groups.

Table 2. Basis for classifying panelists using the PPGM

Category	Classification criteria
Non-Gambling	Has not gambled in the past 12 months
Recreational Gambling	Has gambled in past 12 months Total score 0
At-Risk Gambling	Total score 1+ Does not meet criteria for more severe categories OR Gambling frequency and expenditure ≥ PG median
Problem Gambling	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ Total score of 2-4 OR Total score 3+ Gambling frequency and expenditure ≥ PG median
Pathological Gambling	Has gambled at least once a month in past 12 months Impaired Control score 1+

	Problems score 1+ AND Total score of 5+
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Revising the PPGM

Research has shown that, relative to other instruments, the PPGM varies less as a function of gender, age and ethnicity, is better suited to capture the multidimensional nature of problem gambling and is better able to differentiate between levels of severity (Christensen et al., 2019; Molander & Wennberg, 2023; Williams & Volberg, 2014).

Despite its better performance in the assessment of problem gambling, other categories of the PPGM have lacked rigor. This is particularly true of the ‘at-risk’ category, which is operationalized as levels of symptomatology below the *Problem Gambler* threshold. While the label ‘at-risk’ implies the possibility of developing more serious problems, it is also the case that endorsing low levels of symptomatology may be a ‘wake-up call’ for individuals to reduce their gambling involvement. This view is supported by several longitudinal studies of gambling conducted internationally, which have found the ‘at-risk’ category of both the PGSI and the PPGM to be poorly predictive of future problem gambling, e.g., (Billi et al., 2014; el-Guebaly et al., 2015; MAGIC Research Team, 2021).

In Gooding et al., (2024) researchers used data from a recent Canadian longitudinal study of gambling to revise the PPGM and test the possibility of better discriminators for ‘at-risk’ gamblers who would be most likely to develop more severe gambling problems. The resulting instrument includes the original 14 items that make up the PPGM and one new item measuring perception of gambling problems and was renamed the Problem Gambling Measure (PGM). The study identified five robust predictors of future gambling harm and problem gambling which allow for distinctions between ‘moderate’ at-risk gambling (only 13.1% of people classified in this way will be classified as problem gamblers one year later) and ‘high’ or ‘very high’ at-risk gambling (28.1% and 42.9% of people classified in this way will be classified as problem gamblers one year later). The study also identified that a score of 7 and higher on the PGM was predictive of continued problem gambling one year later (i.e., chronicity). Table 3 presents the PGM typology, and the criteria required for classification across these groups.

Table 3. Basis for classifying respondents using the PGM

Category	Classification criteria
Non-Gambling	Has not gambled in the past 12 months
Recreational Gambling	Has gambled in past 12 months Total score 0
At-Risk Gambling	Does not meet criteria for Problem Gambling Total score 1+ Total PGM score: 0 = 0; 1-2 = 2; 3+ = 5 Score on PGM15: 0 = 0; 1 = 2 Number of types of gambling monthly: 0-2 = 0; 3-4 = 1; 5+ = 4 Largest amount lost in single day: <\$200 = 0; \$200-\$499 = 1; \$500+ = 3

	Importance of gambling as recreational activity: not very important = 0; somewhat important = 1; quite/very important = 2
Moderate At-Risk	Total score 1+
High At-Risk	Total score 4+
Very High At-Risk	Total score 8+
Problem Gambling	Has gambled at least once a month in past 12 months Impaired Control score 1+ Problems score 1+ Total score of 2+ with score of 7+ predictive of continued PG in next 12 months OR Total score 3+ Gambling frequency and expenditure ≥ PG median

Study Limitations

With respect to the online panel surveys, the main limitation is the non-representative nature of online panels since panelists are not randomly selected but have opted to enroll in the panel (discussed above). Another limitation of the online panel surveys is that the questionnaire was only administered in English.

Summary of Methods

Table 4. Research question / method matrix

Research Question		MA Data	NJ Data	Lit.	Policy Rev	Interviews
Understanding Potential Impacts						
1.	What are the characteristics of those who participate in iGaming compared with those who participate in other forms of gaming (both online and land-based?)					
2.	What is the relationship of participation in iGaming with problem gambling, and are there higher levels of risk related to certain types of gambling activities?					
3.	What populations are at highest risk of gambling-related harms from iGaming?					
4.	What are the impacts of iGaming on youth under the age of 25?					
5.	What are the potential public health impacts of iGaming in Massachusetts overall, and specifically for:					
	a. Rates of problem gambling?					
	b. Populations at elevated risk of gambling-related harm?					
	c. Youth under the age of 25?					
6.	What are the potential public health impacts of iGaming in Massachusetts in the context of the legal gaming landscape in the region?					
Considerations for Policy, Regulation, and Research						
7.	What further avenues of study and/or study methodologies are recommended to add to the current body of research on iGaming, and which methods should be used to engage in these avenues of study?					
8.	What are responsible gaming considerations related to iGaming to minimize gambling-related harm, and what kinds of responsible gaming initiatives should be considered if iGaming were legalized?					

Key Findings

Project findings are presented by input:

1. Evidence review
2. Policy review
3. Informant interviews
4. The New Jersey Experience
5. The Massachusetts Context

Summary of Findings

Table 5. Findings by research question

Research Question	Key Findings
<p>1. What are the characteristics of those who participate in iGaming compared with those who participate in other forms of gaming (both online and land-based?)</p>	<p>Evidence on participation in iGaming specifically is limited. As a mode of access more broadly, evidence and data indicate that those who gamble online tend to be highly involved, i.e., participate in multiple forms of gambling. A mix of variables is associated with online gambling participation, including sociodemographic (younger age, male gender, lower income, identifying as Hispanic or Black), personality (impulsivity), and environmental factors (access to legal gambling). Over time, young adults continue to show the highest increases in online gambling participation, but participation is growing for women and for people who do not identify as White.</p>
<p>2. What is the relationship of participation in iGaming with problem gambling, and are there higher levels of risk related to certain types of gambling activities?</p>	<p>A small number of recent studies suggest iGaming, particularly online slots, may be associated with elevated risk. This may be partly due to its inherent risk as a ‘continuous form’ of gambling, i.e., activities characterized by rapid speed of play. Research has consistently demonstrated that continuous forms of gambling such as EGMs and certain casino games, whether online or land-based, are associated with increased risk. Sports wagering has also been associated with increased risk and high participation rates among younger males. More broadly, research indicates that those who gamble in both online and land-based settings consistently show the highest rates of gambling problems and harms (followed by online only, followed by land-based only). This aligns with the well-established finding that breadth of involvement is one of the strongest predictors of risk and harm.</p>
<p>3. What populations are at highest risk of gambling-related harms from iGaming?</p>	<p>While there is a lack of evidence to identify populations experiencing harms from iGaming specifically, there is strong evidence that, in general, harm from gambling disproportionately affects young adults and those who are already socioeconomically disadvantaged. Data from Massachusetts indicate young monthly online gamblers (18-24) are more likely than 25+ monthly online gamblers to experience all harms. Additionally, studies show young people are more likely to experience the most severe harms (suicidality). Those who gamble online (any activity) are also more likely to experience harm than land-based gamblers. As New Jersey data show that women and non-White populations show increases in online gambling participation, these populations should be monitored for increases in problems and harm.</p>

4.	What are the impacts of iGaming on youth under the age of 25?	While the impacts on young people of iGaming specifically have not been thoroughly examined, young adults aged 18-24 are consistently identified as at heightened risk of gambling problems and harms from online gambling, including both sports wagering and casino games. Evidence additionally shows that young people are at greater risk of experiencing the most severe harms from gambling, with gambling problems linked to suicide attempts. Underage youth are also at high risk, especially because they are likely gambling on unregulated sites. The dramatic increase in gambling advertising that typically follows legalization of iGaming increases participation, risk, and harm among underage youth and young adults.
5.	What are the potential public health impacts of iGaming in Massachusetts overall, and specifically for:	Evidence suggests that legalizing iGaming is likely to lead to increased gambling participation. While it is not likely to have a significant impact on the population-level rate of problem gambling, risk and harms can be expected to increase with participation and will continue to be disproportionately experienced by vulnerable populations such as young people, non-White populations, and those who are already socioeconomically disadvantaged. Legalization may also increase help-seeking, which may partly be due to consumers becoming more aware of support resources. Without strict guidelines, gambling advertising will become pervasive, with particularly negative impacts to young people and other vulnerable groups. However, a regulated market provides opportunity to reduce and mitigate public health impacts which may already be occurring for those gambling in the illegal market.
a. Rates of problem gambling?		Decades of global population prevalence research suggest rates of problem gambling (PG) in the population are not likely to change significantly, regardless of changes to the environment. However, the proliferation of new forms of gambling (both regulated and unregulated) and modes of access in recent years, supported by unprecedented levels of targeted and personalized marketing and promotion have not yet been fully captured in the published research. In this current context, it is difficult to eliminate the possibility of a population-level increase in PG rates. Additionally, data from Massachusetts and New Jersey suggest rates of PG could increase among certain population groups.
b. Populations at elevated risk of gambling-related harm?		As is the case for the population generally, increased availability of iGaming will likely increase participation and harms for at-risk populations as well. This is particularly important as harms are disproportionately concentrated and severe among those who are already disadvantaged. Additionally, the negative impacts of increased advertising have been shown

		to disproportionately affect those who are at-risk or already experiencing harms. However, a regulated market can much more effectively protect at-risk gamblers, for example through adequate age verification, consumer protection measures, economic integrity and stability, and transparency.
	c. Youth under the age of 25?	As is the case for the population generally, increased availability of iGaming will likely increase participation and harms for this vulnerable group as well. This is particularly important as young people have been shown to be susceptible to the most severe harms. Additionally, the potential impacts of increased advertising are especially significant for young people, as operators are targeting them in increasingly innovative and unenforceable ways (e.g., social media, influencer marketing). However, a regulated market provides opportunity to mitigate some key risks to this group, most importantly through strict advertising restrictions, adequate age verification, and special account limits for younger players.
6.	What are the potential public health impacts of iGaming in Massachusetts in the context of the legal gaming landscape in the region?	Two of the five states surrounding Massachusetts offer legal iGaming (CT and RI), with just four licensed operators across both states. The limitations of such a restricted market, as well as geofencing technology that prevents individuals physically located outside a regulated state market to access its licensee platforms, make it unlikely MA residents are experiencing any impacts from iGaming markets outside the state.
7.	What further avenues of study and/or study methodologies are recommended to add to the current body of research on iGaming?	The final two questions are answered in the form of specific recommendations drawn from all five study inputs, as well as the authors' collective experience and expertise in research and public policy.
8.	What are RG considerations related to iGaming to minimize gambling-related harm, and what kinds of RG initiatives should be considered if iGaming were legalized?	<i>Six</i> avenues of study are proposed to address the most significant gaps in the current evidence on iGaming. <i>Twelve</i> key considerations and policy recommendations are proposed for establishing and implementing a regulatory framework for iGaming that would effectively minimize harm to players and the wider community.

Evidence Review

Section Summary

- While research examining online casino gambling (iGaming) specifically is limited, recent evidence suggests that this form may be associated with increased risk, particularly as it can be considered a “continuous” form of gambling that allows for rapid, intense play for long periods of time.
- Evidence continues to indicate that young people, particularly males, have heightened vulnerability to gambling risk and harm.
- A small body of research suggests that legalization of new forms of gambling may lead to increased participation and harms.

Findings are organized in three sections:

- **Risks of iGaming**
- **Implications of Legalizing New Forms**
- **Approaches and Strategies to Address Gambling Harms**

Risks of iGaming

Despite a large body of research examining the risk factors for problematic or harmful gambling, links between individual forms of gambling and elevated risk have been difficult to establish. Problematic gambling is the result of many, correlated risk factors which can create analytical and interpretation challenges for isolating individual relationships. Additionally, the strength of certain factors can obfuscate other potential relationships.

Breadth of involvement may be a stronger predictor than engagement in any activity

For example, research spanning more than 20 years consistently demonstrates that breadth of involvement (i.e., participation in multiple forms of gambling) is one of the strongest predictors of problematic gambling (Binde et al., 2017; Blaszczynski et al., 2016; Delfabbro et al., 2024; Gainsbury et al., 2015; Gainsbury et al., 2015b; Gainsbury et al., 2019; Gooding & Williams, 2024; Mazar et al., 2020; Phillips et al., 2013). The prominence of this indicator among problem gamblers is generally stronger than the effect of participation in any individual form of gambling (Binde et al., 2017). Indeed, Gooding & Williams (2024) found that breadth of gambling involvement was a stronger predictor of gambling problems than involvement in any individual type of activity or mode of access. Some earlier studies demonstrated that the association between problem gambling and individual forms of gambling was significantly attenuated, disappeared or was even reversed when statistically controlling for gambling involvement (Laplante et al., 2011; LaPlante et al., 2013, 2014; as cited in Binde et al., 2017).

‘Continuous forms’ are associated with increased risk

However, this does not necessarily mean that all forms of gambling are equally harmful, and relative consensus has emerged around the increased risk associated with “continuous” forms

of gambling, including some forms of online gambling (see Allami et al., 2021 for a review). Continuous forms of gambling allow for rapid play, with a short time between wagering and the outcome, in which an individual can engage for long periods of time. In studies comparing various forms of gambling, three continuous forms repeatedly emerge as associated with increased risk: (1) EGMs (electronic gambling machines) (Allami et al., 2021; Binde et al., 2017; Delfabbro et al., 2020; Gainsbury et al., 2019; Gooding & Williams, 2024; Williams et al., 2021), (2) casino table games (Allami et al., 2021; Binde et al., 2017; Gooding & Williams, 2024), and, (3) online gambling (Allami et al., 2021; Gainsbury et al., 2019; Gooding & Williams, 2024).

Online gambling as a mode of access is associated with increased risk

Many studies focus on online gambling as a mode of access, encompassing all types of gambling activities including sports betting, casino-style games, poker, lottery, Keno, etc. In a global meta-analysis of 104 studies, Allami et al. (2021) found that, among 57 diverse risk factors, online gambling had the greatest association with problem gambling, followed closely by other continuous forms (EGMs, casino gambling, poker, and daily lotteries). Gooding & Williams (2024) found that, despite breadth of involvement being a stronger predictor of problematic gambling than any individual activity, involvement in EGMs, casino table games, and online gambling to a lesser extent did confer additional risk. A recent Australian prevalence study (Suomi et al., 2024) found that online gambling was related to risky gambling (PGSI 1+), as well as to well-established sociodemographic risk factors, such as younger age and male gender, and behavioural factors such as more frequent gambling (see above discussion on breadth of involvement). While this evidence broadly suggests that online gambling, as a mode of access, is higher risk than land-based gambling, it does not allow for attributing the increased risk to individual types of activities (e.g., online sports, online casino, online poker, etc.).

Evidence on the risks of online casino gambling is emerging

Research examining the risk associated with online *casino* gambling individually is limited. However, a 2025 study (Wardle & Tipping, 2025) tested the assumption that gambling involvement is a greater predictor of gambling harm than participation in individual forms and found that engagement in gambling activities such as online casino and/or slots was independently associated with higher PGSI scores, even when gambling involvement was accounted for. In addition, two recent Nordic studies identified online casino games as particularly harmful. An analysis of helpline data from Denmark, Finland, and Sweden (collected between 2019–2022) found the greatest share of callers reported engaging in online casino products, accounting for close to 70% of calls in Finland and Sweden, and 47% of those in Denmark (Marionneau et al., 2024b), with the authors noting that their observation period coincided with the COVID-19 pandemic and that closures of land-based venues may have impacted results. In a two-year longitudinal study of Finnish adults, Oksanen et al. (2024) found that online casino games and offline EGMs were associated with the highest risk of at-risk gambling, as defined by a PGSI score of 5 or higher.

At-risk players may be more likely to participate in online casino

Emerging research further suggests that individuals who are at increased risk of gambling harm are overrepresented among online casino gamblers. Oksanen et al. (2024) reported that 57% of

their sample of at-risk gamblers participated in online casino games, compared with 10% of the total sample. In their investigation of the demographic, behavioral and psychological risk factors for gambling problems linked to individual forms, Hing et al. (2017) found that risk factors for problematic online EGM gambling included substance use when gambling, and higher psychological distress. In their meta-analysis of global prevalence, Tran et al. (2024) reported that the prevalence of problematic gambling (PGSI 5+) was highest among adults who participated in online casino or slots gambling at 15.8%, compared to 10% of offline casino gamblers, 8.9% of sports bettors, and 8.6% of undefined online gamblers (any activity).

Young people are at higher risk

Recent studies indicate that online gambling, including online casino, is associated with elevated risk among emerging adults. A recent meta-analysis of global prevalence (Tran et al., 2024) found the prevalence of problem gambling among those who gamble online was highest for 18–24-year-olds at 15.8%, compared to 8.6–10% for the whole population. In addition, more than a quarter of adolescents who play online casino or slots are problematic gamblers, though higher rates of problem gambling are seen among adolescents who engage in in-venue casino gambling and betting on races as well. Young males are at higher risk than females. In their global review, Tran and colleagues found that adolescent males engaged in any risk gambling at higher rates (9.3–38.1%) than girls (2.5–25.6%). In another systematic global review of 44 studies, Calado and colleagues (2016) found that adolescent boys and young adult males (10–24 years old) were more likely to be problem gamblers and engaged more frequently in all gambling activities. Wardle & Tipping (2023) measured the association between problem gambling severity and 19 different gambling activities among emerging adults (aged 16–26), and found a range of gambling activities – skin betting, fixed odd betting terminals, slot/fruit machines, online betting on horse/dog races, and online betting on non-sports events – were associated with increased PGSI scores.

As well as being at increased risk of engaging in problematic gambling, evidence indicates that young people are additionally at risk of more severe harms. Wardle & McManus (2021) found that problem gambling is a risk factor for suicide among young adults.

Problem gambling appears to be associated with suicide attempts in both young men and young women. This association persisted after adjusting for anxiety, impulsivity, life satisfaction, and other factors, which suggests that other mechanisms, such as the severity and multiplicity of harms experienced, or gambling to cope with life stressors, might underpin this relationship. Young people with problem-gambling behaviours should be considered at risk for suicidality. (Wardle & McManus, 2021)

Implications of Legalizing New Forms of Gambling

Despite a global shift to regulated gambling markets, there is limited empirical evidence on the impacts of legalization on gambling participation and harms. The small number of studies have focused on legalization of online gambling broadly (i.e., without distinguishing by type of activity), or in some cases on the legalization of online sports wagering, which has occurred

more frequently than the legalization of online casinos. To date there is no published evidence individually assessing impacts of legalized online *casino* gambling.

Legalization may increase participation and harms

Two studies conducted in Canada following the legalization of online sports wagering in April 2022 found that participation had increased, with the total amount wagered increasing by 300% the year following legalization (Young et al., 2024). Helpline data from Ontario, Canada indicated that harms may similarly have increased, with the percentage of calls related to online gambling increasing from 34.2% in the ten-month period prior to legalization, to 50% following the launch of online sports wagering (Turner et al., 2024). In a third study conducted in Spain two years after its legalization of online gambling (sports and casino), Choliz et al. (2016) found a significant increase in young pathological gamblers seeking treatment.

The unregulated market poses important risks

One of the primary stated objectives of legalization across jurisdictions is to limit the unregulated market and its associated risks and harms. Two recent studies explored unregulated gambling markets, pointing out their consumer protection failings, the financial and economic challenges they pose, and the risks they present in terms of lack of transparency and opportunities for fraud and criminal behaviour (Andrade et al., 2022; Chopin et al., 2024). In a review of 40 unregulated cryptocurrency-based gambling operators accessible in the UK, Andrade et al. (2022) found several failings related to safer gambling and consumer protection – none of the sites performed identity verification and 35% required only an email address to register, more than a third (37.5%) did not offer any safer gambling tools, and 64.7% continued promotional emails after being informed of a customer's impaired control.

Additionally, research across multiple jurisdictions indicates that individuals who engage in illegal or unlicensed gambling may be at greater risk of gambling harm. In a 2016 study conducted in France following the regulation of online gambling in 2010, Costes et al. (2016) found that, within their sample of 3,860 participants, gambling on unlicensed sites was associated with more intense gambling patterns and more gambling-related problems compared to gambling on licensed sites, and that gambling activities conducted on state licensed sites were associated with less overall harm to gamblers. Similarly, in a study of 3,199 Australian gamblers, Gainsbury et al. (2018) determined that 25.8% of online gamblers used offshore sites, and that these were more involved gamblers overall and had greater problem gambling severity than gamblers using licensed sites. The authors noted the majority of online gamblers preferred licensed sites, suggesting that regulation of online gambling, with adequate consumer protection measures, may benefit individuals who gamble online. A recent Canadian study on the prevalence of illegal gambling (Mackey Simpkin et al., 2022) found that the most robust individual predictors of participating in any type of illegal gambling were engagement in a larger number of gambling formats and having a higher overall frequency of gambling. Additional individual predictors for specific types of illegal gambling were the presence of gambling problems, male gender, younger age, and race/ethnicity. Finally, in an analysis of the association between offshore gambling and financial harm using banking data, Lahtinen et al. (2025) found that offshore gambling was associated with higher levels of gambling participation

and financial losses than onshore (licensed) gambling. However, those who gambled both onshore and offshore had even higher levels of participation and unsecured debt than those gambling offshore only.

Approaches to Address Gambling Harms

As global jurisdictions are shifting to regulated online gambling markets, there has been increasing focus on approaches and strategies at the policy, regulatory, and industry levels that reduce or prevent gambling harm. There is evidence to support four approaches:

- Public health approach
- Multi-stakeholder collaboration
- Advertising restrictions
- Player protection

Public Health Approach

Seven recent studies call for a public health approach to regulating gambling (Marionneau et al., 2021; Price et al., 2021; Regan et al., 2022; Ukhova et al., 2024; van Schalkwyk et al., 2021; Wardle et al., 2024; Wheaton et al., 2024). Broadly, a public health approach can be defined by:

- A focus on population harm, rather than problem gamblers
- The regulation of systems, products and environment, rather than of individual behaviour
- The use of a range of interventions; upstream, midstream, and downstream
- An emphasis on harm prevention, early intervention, and harm minimization (as well as treatment)

(Wardle et al., 2024)

The Lancet Public Health Commission on Gambling recommended that “[a] public health approach to regulating the gambling industry and preventing and responding to related harms should underpin policy design, implementation, and review.” (Wardle et al., 2024, p. 951). The authors further note that “[e]vidence indicates that universal measures targeting entire populations are the most effective when implemented consistently and comprehensively, aligning with a public health approach.” (p. 951). In a global review and analysis of gambling policy, Ukhova et al. (2024) found that despite recognizing gambling harm as a public health issue, this is not yet translating into comprehensive policy action across jurisdictions. Additionally, the authors caution that the effectiveness of population-level prevention depends on implementation, requiring ongoing evaluation and monitoring of policies.

Multi-Stakeholder Collaboration

According to some studies cited above, collaboration across multiple stakeholders is a key element of a public health approach (Gainsbury, Black, et al., 2020; Swanton et al., 2021; Velasco et al., 2021; Wheaton et al., 2024). Gainsbury et al. (2020) propose a framework for reducing online gambling harms that includes explicit roles for individual users, community groups, the gambling industry, government and regulators, financial institutions, and researchers. Going further, in response to recent evidence demonstrating the link between payment behaviours and gambling harm (Gainsbury & Blaszczynski, 2020; Ghaharian et al.,

2023; Marionneau et al., 2023; Muggleton et al., 2021; Rodda, 2021; Zendle & Newall, 2024), researchers have called for an active role for financial institutions in preventing gambling harm (Lakew, 2022; Lakew et al., 2024; Swanton et al., 2019). This stakeholder in particular could have a meaningful impact on preventing financial harm, by offering products and resources to support customers in managing their gambling expenditure (Swanton et al., 2019), and going further, by engaging in the duty of care approach by monitoring defined financial indicators and intervening accordingly (Lakew et al., 2024).

Advertising Restrictions

In response to the large and growing body of evidence on the impact of gambling advertising on behaviours, risk, and harm (see McGrane et al., 2023 for a systematic review), advertising restrictions have become a prominent area of focus for policy makers and gambling regulators. A small number of recent studies propose an evidence basis for advertising policy as part of a public health approach to harm prevention (Akçayır et al., 2022; Garzola, 2024; McGrane et al., 2023; Young et al., 2024). Additionally, in their systematic umbrella review, McGrane et al. (2023) conclude there is a sufficient evidence basis for advertising restrictions, which would likely reduce harm particularly for children, young people, and adults who are already at-risk or experiencing gambling harms. The authors further recommend that policy evaluations of any such restrictions would be vital for informing future public health policy. Indeed, a 2025 evaluation of the impact of gambling marketing regulations on online gambling behavior and marketing expenditure in Spain (Aonso-Diego et al., 2025) found the regulations led to a decrease in gambling behavior, in particular new accounts and total money bet. Additionally, the authors found the regulatory measures had an impact on marketing strategies, specifically, reducing money earmarked for advertising, bonuses, and sponsorship.

Player Protection

In the online gambling space, two overarching efforts to protect players have been examined in the literature: (1) responsible gambling (RG) tools, and (2) leveraging player data. Both approaches have demonstrated some degree of effectiveness at reducing harm and are widely implemented by operators around the world. In many jurisdictions, the regulatory framework includes requirements for implementation of both approaches; in some cases, going further by additionally requiring evaluation of their effectiveness.

RG tools can reduce risk & harm

Multiple studies over the past several years have demonstrated that responsible gambling (RG) tools such as limit-setting, play breaks, and activity statements can help reduce harm (Auer et al., 2020; Delfabbro & King, 2021; Gainsbury et al., 2025; Hollingshead & Wohl, 2022; Hopfgartner et al., 2022; Luquiens et al., 2019; McGivern et al., 2019; Wang et al., 2025; Yu et al., 2023). Some research suggests these tools can be even more effective when supported by personalized messaging (Auer & Griffiths, 2023; Hopfgartner et al., 2022). However, research has also shown that use of such tools by players is very low, with some studies indicating less than 2% of players use RG tools (Tabri et al., 2019). In their survey of Australian gambling sites, Gainsbury et al. (2020) found that most players did not use RG tools including activity reports, deposit limits, and time-outs, as they perceived them to be for problem gamblers, and therefore

not relevant to them. The authors support the common recommendation that RG tools must be implemented accompanied by educational and promotional resources to encourage their uptake (Gainsbury, Angus, et al., 2020; Wang et al., 2025).

Player data can be a valuable tool for harm reduction

One of the stated advantages of online gambling formats is their capacity for collecting and leveraging player behavior data that can enable identification of, and response to, risky or problematic gambling in a range of ways. The most common approach is the use of player analytics systems which use machine learning techniques to monitor behaviors and predict risk and respond to identified risk through automated interventions (e.g., pop-up messaging). These systems have become standard for online operators. While evaluations of the systems themselves have not been published to date, studies have demonstrated that machine learning techniques can accurately predict problematic gambling (Andersson et al., 2025; Auer & Griffiths, 2022; Kairouz et al., 2023; Murch et al., 2024; Perrot et al., 2018). Player analytics systems are also an important element of operators' risk response approaches, by generating automated interventions for low to moderate risk players, as well as helping to identify the highest risk players who may require personalized interventions. A growing body of research indicates operator interventions such as personal telephone calls can favourably impact gambling behaviours (Hakansson et al., 2024). Regulators in mature gambling markets are increasingly requiring operators to demonstrate efforts to respond to escalated risk.

Summary

While research examining online casino gambling specifically is limited, recent evidence suggests that this form may be associated with increased risk. Several studies suggest breadth of involvement may be the primary driver of this higher risk, because those who gamble online tend to gamble across multiple modes and types of games. However, a recent study (Wardle & Tipping, 2025) tested this assumption and found that engagement in online casino and/or slots was independently associated with higher PGSI scores, even when gambling involvement was accounted for. Regardless of the underlying factor(s), evidence suggests online casino gambling may pose particular risk for young people, and that at-risk gamblers are more likely to engage in this form of gambling. Taken together, these findings suggest online casino gambling carries important and distinct risks. Governments and regulators must decide how to most effectively reduce and prevent this risk. A small body of research indicates that legalization may lead to increased participation and harms, but that unregulated gambling also poses meaningful risks. A number of harm reduction approaches have been studied which can help support these decisions and mitigate negative impacts to public health.

Policy Review: Surrounding States & National Trends

A review of neighboring states helps establish the potential for gambling-related impacts to Massachusetts residents from outside the state, as well as provide context and examples of policy-driven harm minimization efforts in nearby jurisdictions. An examination of national trends provides insight into the challenges of gambling expansion as well as learnings that can help inform decision making in Massachusetts.

Section Summary

- Eight US states offer legal iGaming; 32 states offer legal online sports wagering
- Only two of the five states bordering Massachusetts offer legal iGaming (CT and RI), with legislation stalled or not considered in the other three (NH, NY, VT).
- Legislation and broader efforts to expand gambling have stalled throughout the US, with no new bills expected to pass in 2025.
- Political will to expand legal gambling markets appears to have been tempered by several economic (tax revenue shortfalls) and social factors (harassment of athletes, excessive advertising, inadequate player protection).

This section includes two parts:

- **Surrounding States** – summarizes the legal status of online gambling activities and harm reduction policies in the five states surrounding Massachusetts
- **National Policy Trends** – provides a brief overview of the current state of gambling policy across the US

Surrounding States

The five states that border Massachusetts – Connecticut, New Hampshire, New York, Rhode Island, and Vermont – were reviewed in terms of the legal status of online gambling activities (current and proposed) and their harm minimization policies.

Legal Status of Online Activities

The legal status of various modes of access and types of activities varies across the five states. While online sports wagering is legal and regulated in all five states, iGaming is currently legal in just two – Connecticut and Rhode Island. Both states function as relatively restricted iGaming markets. In Connecticut, iGaming is legally offered only through its two federally recognized tribes (Mashantucket and Mohegan) and DraftKings. Rhode Island's iGaming market is even further restricted, with Bally's extending the monopoly they maintain for land-based gambling in the state.

In New York, New Hampshire, and Vermont iGaming remains unregulated, with proposed legislation in New York and New Hampshire stalled as of this report's publication in December 2025. In New York, legislation to regulate the online casino market has faced repeated delays,

with the third and latest iteration, including a proposed 30% tax rate, slated for consideration in 2025 but with seemingly minimal progress as of publication. Similarly, while New Hampshire legalized online lottery games in 2018, consideration of a bill to regulate online casino games introduced in 2023 was put on hold in March 2025, with no further news as of publication. Vermont is the most conservative gambling market of the five surrounding states, where online sports wagering is the only legal and commercially available form of gambling (as of January 2024, making Vermont the last state in New England to legalize online sports wagering). There are no tribal or commercial land-based casinos in Vermont, and no legal land-based sports wagering sites. The regulation of online casino gambling in Vermont has not been considered to date. In keeping with the apparent approach taken to online sports wagering, policy makers may plan to hold off until all its neighboring states have adopted legal iGaming.

The lack of progress on legalisation of iGaming in New York, New Hampshire, and Vermont appears to follow a broader national trend of decreasing support and political will for opening online casino markets, in response to a range of economic and public health considerations. This trend is further discussed in the *National Policy Trends* section below.

Harm Minimization

The legal and regulatory requirements and enforcement of player protection and harm minimization measures vary across the five neighboring states. Key measures include:

- Requiring operators maintain some form of responsible gambling program; vaguely described but which may consist of employee training, player tools, self-exclusion, and other player protection efforts
- Mandatory levy to support state harm reduction programs
- Mandatory annual reporting on player data (expenditure and some other behaviours)
- Advertising restrictions
- Requiring program evaluation

Connecticut leads the five states in terms of its harm reduction program, which requires an annual levy, state problem gambling prevention and treatment services, advertising restrictions specifically in regard to young people under the age of 21, and mandatory, licensee-funded independent evaluation of compliance with the regulation's responsible gambling guidelines every five years.

However, according to a September 2024 report (Vixio, 2024) released by the National Council on Problem Gambling (NCPG), none of the five states include adequate player protection and harm minimization measures as outlined by the NCPG's Internet Responsible Gambling Standards (IRGS). While Connecticut met the highest number of standards (49 of 82), New York, Vermont, New Hampshire and Rhode Island all met fewer than 40 of the 82 standards, which is in line with the average across states (32 of 82 standards met).

National Policy Trends

As of September 2025, eight US states offer legal iGaming: Connecticut, Delaware, Michigan, Nevada (where the sole game allowed is online poker), New Jersey, Pennsylvania, Rhode Island, and West Virginia. Rhode Island was the last US to legalize iGaming, in June 2023. The rapid opening of the sports wagering market across the US led to 39 states plus Puerto Rico and Washington D.C. introducing legalized sports wagering, of which 32 offer online and mobile betting.

Some key trends since the peak of legalization include:

1. **Legalization of sports wagering** has stalled
2. **Legalization of iGaming** that was predicted to follow the rapid expansion of sports wagering has not materialized
3. **Criticism and resulting restrictions** are following the rush to legalize sports wagering
4. State legislatures are **increasing taxation** on sports wagering, in some cases after anticipated revenues fell short

Stalled Sports Wagering Legalization

Of the 11 states that have not legalized sports wagering Utah is out of consideration (due to its deep ties to the Mormon faith), leaving ten states with potential for the introduction of regulated sports wagering. However, further expansion is expected to be very slow based on recent policy activity:

- 2024 was the first year with no gambling expansion in any state
- 2025 may continue this trend, with new bills introduced but unlikely to pass before the end of the year
- Of the nine states that limit sports wagering to retail, few have introduced any bills to expand to mobile/online sports wagering
- Further legalization largely depends on ballot initiatives and/or tribal agreements

It would be fair to say that the gambling industry would consider 2024 an epic fail in regards to legalization. No US state expanded gambling of any kind, marking the first year since the Professional and Amateur Sports Protection Act fell in 2018 that that happened

(Dorson, 2024)

Bills to expand sports wagering have stalled

In 2025, five states introduced bills to authorize online sports wagering, but four concluded their legislative sessions for the year with no gambling expansion. In Missouri, after sports wagering bills stalled in the legislature in 2024, the Secretary of State recently approved a sports betting ballot initiative for November 2025. Mississippi and Nebraska both introduced bills in 2025 to expand their retail sports betting to online. In Mississippi, this is the second attempt in the past two years, with legislators expressing concern about the effect online sports betting would have

on casinos. The Nebraska bill would require mobile sports betting operators to partner with casinos to minimize the negative impact. Neither bill is slated to pass in 2025.

There are regional differences in the approach to legalization

Legalization is concentrated in the US Northeast and the mid-Atlantic, as well as the Midwest. In parts of the US South there remains a strong conservative Christian aversion to gambling, where Alabama, Georgia, and South Carolina currently form a small bloc of non-legal gambling states. The Pacific Northwest, California and Texas are all resisting legalization. In states like California, Oklahoma, and Texas, tribal interests are powerful in protecting their existing gambling businesses. Washington State has restricted sports betting to the grounds of tribal reservations, to give a boost to tribal economies. The rationale was to avoid the state depending on revenue from gambling and instead use progressive taxes to fund the budget, which are more sustainable and healthier for society.

Stalled iGaming Legalization

Online casino gambling was widely predicted to follow the widespread legalization of sports gambling. However, no new state has legalized online casino gambling since the boom in legal sports wagering between approximately 2022–2024. A number of states including New York, New Hampshire (both discussed in the previous section), Maryland, and Ohio put forward bills to legalize iGaming between 2023 – 2025, but with no indication of moving forward as of publication of this report in December 2025.

The most widely stated reason for resisting regulated iGaming is the concern it could cannibalize land-based casino business. However, there appear to be several additional economic and public health considerations behind the increasing hesitation to expand gambling availability, including shortfalls in predicted revenue from legalized sports wagering, public backlash around advertising, and evidence of increased gambling harm (discussed below).

Criticism & Restrictions

Criticism around the expansion of gambling, specifically online sports wagering, centres on four key issues:

- negative impact on sports and athletes,
- public backlash over the volume of advertising,
- inadequate player protection, and
- shortfalls in predicted revenue.

As well as spurring new restrictions on existing sports wagering offerings, these concerns may be creating hesitation among policy makers to further expand gambling in their states by legalizing iGaming.

Criticism and restrictions at the national level

In September 2024, the National Council on Problem Gambling (NCPG) released a report (Vixio, 2024) finding that states' sports wagering regulation frameworks are falling far short of

meeting the NCPG's *Internet Responsible Gambling Standards (IRGS)*. On average, states met just 32 of the 82 player protection standards outlined in the IRGS. The report called for "legislators and regulators to take immediate steps to close these gaps and work to mitigate gambling-related harm".

In the same month, federal legislators proposed the *Supporting Affordability and Fairness with Every Bet Act* (or *SAFE Bet Act*) to propose national standards targeting a range of issues.

"State regulation is faint-hearted and half-baked. That's why we need a national standard," Blumenthal said. "Not to ban gambling but simply to take back control over an industry that is out of bounds."

(Barr, 2024)

The proposed bill highlights concern around advertising, artificial intelligence, prop betting, affordability, and exclusion:

- **Advertising** – would prohibit advertising from 8AM to 10PM and during live sporting events, and ban "bonus bets", "no sweat bets", and similar incentives.
- **Use of artificial intelligence** – would prohibit the use of AI to track a bettor's individual gambling habits to create "microbets", tailor-made for individual customers.
- **Prop betting** – would impose a national ban on betting on collegiate sports, especially on the performance of individual athletes, which advocates link to online harassment.
- **Affordability** – would prevent operators from accepting more than five deposits from a customer within a 24-hour period, prohibit operators from accepting credit card deposits, and require operators to conduct "affordability checks" on customers before they place wagers of more than \$1,000 within a 24-hour period.
- **Self-exclusion** – calls for the formation of a nationwide "Self-Exclusion List", which operators would have to check before accepting wagers from customers.

The legislation is unlikely to pass as it would establish a nationwide ban on sports betting (land-based and online), requiring the 39 states with some form of legal sports wagering to go through a new application process with the US Justice Department, with approvals only lasting for a three-year period. However, the irregular proposal of federal involvement in the legislation of gambling reflects the seriousness of the criticism of current state regulation. Further, the issues highlighted in the proposed act are consistent with concerns expressed by legislators and advocates across many states.

Criticism and restrictions at the state level

Some individual states are taking regulatory action in response to negative impacts of expanded sports wagering, particularly to address the harassment of athletes and the volume of advertising.

“I interviewed Charlie Baker, the former governor of Massachusetts who signed the bill legalizing bookmaking there in 2022, and then a few months later became president of the NCAA and has become a really vocal champion for limiting the amount of betting on college sports, particularly in light of the brutal harassment that college athletes and coaches get whenever their performance costs someone a bet,” Funt recalled. “It’s honestly horrifying, the sort of stuff they see on social media and in real life. And he has said point-blank, ‘I wish, in hindsight, this had stayed in Las Vegas.’”

(Demsas, 2025)

The NCAA is tackling the issue of harassment in several ways and research published in June 2025 shows a decline in overall harassment as well as harassment by sports wagering customers (Myers, 2025). NCAA president Charlie Baker continues to push for states to ban prop bets on individual college players. The NCAA is also requesting anti-harassment laws that would ban abusive bettors from state-licensed sportsbooks. To protect athletes, Louisiana, Ohio and Maryland recently banned betting on college sports, with other states expected to follow.

The pervasiveness of gambling advertising has become an issue across global jurisdictions. Calls for tougher advertising regulations have been recently reported in multiple US states, including New York, New Jersey, and Illinois, which just introduced a ban on advertising on college campuses in August 2025. In July 2025, Connecticut’s Department of Consumer Protection announced a settlement following an investigation into alleged violations of Connecticut’s gaming laws related to marketing and advertising. The settlement requires DraftKings to return more than \$3M to 7,000 players who participated in certain bonus offers. While no further regulatory restrictions have been proposed, the legal action reflects a growing intolerance for excessive and inappropriate gambling advertising methods.

States Increasing Taxation

According to an August 2025 report, since states began to legalize sports wagering, the total handle (total amount wagered) is \$538.1B, generating \$47B in revenue for the industry and \$9.2B in state tax revenue (Ramsey, 2025). The largest share of taxes, at \$3.26B, goes to New York, with the largest sports wagering market and the highest tax rate. In other states, tax revenues are not meeting expectations. Likely in response to unmet expectations, at least nine states have raised taxes on sports wagering since late 2023 (see Table 6). With state tax revenue touted as the key economic benefit of expanded gambling, partially offsetting its significant risks to public health, the lower-than-anticipated revenues generated by online sports wagering may be tempering lawmakers’ desires and efforts to introduce iGaming.

In March 2025 the Bipartisan Policy Center proposed that Congress consider raising the federal excise tax on gambling from 0.25% to 5% (Lautz & Hernandez, 2025) to raise billions of dollars in revenue. The rationale is that gambling should be subject to a ‘Pigouvian tax’, a taxation approach designed to disincentivize consumption of products because of their social and economic harm, similar to the approach used for taxing alcohol and tobacco products.

Table 6. Increases in sports wagering taxes since 2023

State	Recent taxation changes on sports wagering
Colorado	Voters approved increased taxation in a ballot initiative. The <i>Sports Betting Tax Revenue Voter Approval</i> bill allows the state to retain all sports betting tax revenue, rather than refund the amount collected in excess of \$29M annually to taxpayers who paid the tax. With bipartisan sponsorship, legislators eliminated an incentive that enabled sportsbook operators to deduct a percentage of ‘free bets’ from taxable revenue. It will gradually eliminate the deduction by July 1, 2026.
Illinois	In response to a proposal to raise sports betting taxes from 15% to 35% in 2024, legislators enacted legislation to: <ul style="list-style-type: none"> - create a tiered tax rate structure with a maximum rate of 40%; and - add a per-wager tax of \$0.25 for the first \$20M in bets placed every fiscal year, and \$0.50 on any wagers placed above that amount.
Louisiana	A bill that would increase sports gambling tax from 15% to 21.5% has already passed both the House and the Senate and is expected to be signed into law by the Governor. One-fourth of the increase would support college athletes at Louisiana’s public universities.
Maryland	The <i>State Budget Reconciliation and Financing Act</i> increases mobile sports betting taxes from 15% to 20%, lower than the proposed 30%.
Massachusetts	In 2024, lawmakers introduced an amendment to raise the tax on sports betting from 20% to 51%. The bill failed, but the proposal has been reintroduced in 2025.
New Jersey	The Governor included in the state budget a proposal to increase online sports betting tax from 13% to 25% and increase online casino tax from 15% to 25%. The additional revenue would address the projected budget deficit and fund programs for older adults and those with disabilities.
North Carolina	The Senate passed a budget bill to double the sports wagering tax rate to 36% but is awaiting approval from the House of Representatives.
Ohio	<ul style="list-style-type: none"> - In 2023, Ohio doubled the tax on sports betting revenue from 10% to 20%. - In 2025, the Governor proposed doubling the tax again to 40%, but the legislature did not approve the second increase. - A new bill would add a 2% tax on the ‘betting handle’ (total amount wagered by bettors), in addition to the 20% tax on online sports gambling revenue, making Ohio the first state to tax both handle and revenue.
Wyoming	A proposed bill would double the online sports wagering tax rate to 20% as part of a broader push to raise taxes on gambling, including on skill-based amusement games and historic horse racing.

Informant Interviews

Informant interviews were conducted with three former regulators and one industry association leader, to understand the experience of expanding and opening online gambling markets in Ontario, Canada and New Jersey, USA. Interviewees were asked to about the objectives of expansion, the resulting regulatory design for new online markets, and any harm minimization efforts built into regulatory frameworks.

Findings have been aggregated across interviewees, and in some cases additional research was conducted to contextualize contributions and recommendations and to provide a more comprehensive case study of the two jurisdictions.

Section Summary

- States should assess the economic potential, as well as revenue expectations, of any considered gambling expansion, to establish taxation and other policy accordingly.
- It is equally important to establish clear policy and regulatory goals of any expansion, and ensure adequate structures are in place to enable them.
- Key areas requiring stringent regulatory guidance include advertising, AML, and consumer protection.
- A rigorous, independent research program should be established from the outset, to enable data-driven decisions and updates to policy and regulation.
- A regulated market does not eliminate the black market; states should concurrently implement strategies for effective monitoring and enforcement of illegal operators.

Summaries are provided by jurisdiction:

- **Ontario, Canada** – Making the Gray Market White
- **New Jersey, USA** – Navigating National Prohibitions

Ontario, Canada – Making the Gray Market White

In April 2022, Ontario was the first province in Canada to move from a state monopoly online gambling market to an open, competitive one. This was a test of the federal Criminal Code of Canada that has been closely watched by the other provinces and the online gambling sector globally.

Ontario's approach centered on bringing the existing gray market operators into the regulated market to provide a smooth transition for customers and maximize the goal of channelization (assimilating as much of the gray market as possible into the regulated space to maximize player safety and minimize illegal operators). Largely regarded as a success, Alberta and other provinces are expected to follow suit.

Background

Canada is generally considered a grey market in terms of online gambling outside the provincial monopolies, due to the tolerance of and lack of legal action against unlicensed operators. One province attempted enforcement action against unregulated sites but was unsuccessful; in 2018 Québec's Bill 74 requiring internet service providers to block sites that competed with its LotoQuébec.com site was deemed unconstitutional. There does not appear to be any other enforcement action against unregulated sites to date⁶.

This led to a growing unregulated market and mounting pressure on Canadian provinces to open their online gambling markets. Pressure escalated when the federal government lifted its longstanding ban on single-event sports betting in August 2021, in part to protect markets that border the US which had lifted its federal ban on online sports wagering in 2018.

Overall, three factors primarily drove market liberalization in Ontario:

- A large, persistent unregulated (gray) market that did not ensure consumer protection and ceded any potential economic benefit
- Legalization of single event sports betting in Canada, and its evolution to online platforms
- Weaknesses in the provincial monopoly online gambling site PlayOLG.com (operated by Ontario Lottery and Gaming since 2010) which was estimated to hold a minor market share, and lacked products like sports betting, mobile apps, and live casino offerings

Objectives

The Ontario government's Minister of Finance and the Attorney General shared leadership on liberalization. They established four core policy objectives:

- Consumer choice (expanding options beyond PlayOLG.com)
- Consumer protection (safe/responsible play)
- Reduced government red tape (simpler regulation and innovation)
- Market growth (economic development and job creation)

Regulatory Design

The move to an open market was not predetermined; regulators conducted extensive consultations starting in 2018 with industry stakeholders and regulators from other jurisdictions, leading to Ontario's open licensing model.

Legal constraints required the province to provide a "conduct and manage" role (per the Criminal Code of Canada), leading to the creation of iGaming Ontario (iGO) as a subsidiary of the Alcohol and Gaming Commission of Ontario (AGCO) that accommodated AGCO's regulatory independence while sharing back-of-house efficiencies. This has since been somewhat eroded.

⁶ This is likely to change as Canada ramps up its AML regime, with unlicensed online gambling sites identified as vulnerabilities (FINTRAC, 2024)

Ontario studied regulatory models from Europe (such as the UK, Denmark, Gibraltar, Malta, Isle of Man), New Jersey, and other jurisdictions, categorizing them into three tiers based on the regulatory framework and the extent to which it was actioned. For operators that were already licensed in jurisdictions designated as Tier One, AGCO relied on MOUs with those regulatory bodies to streamline licensing and reduce red tape.

Channelization as a regulatory objective

The regulatory objective for opening the market became channelization – assimilating as much of the gray market as possible into the regulated space to maximize player safety and minimize illegal operators. Achieving a high channelization rate by migrating players as seamlessly as possible from the unregulated to the regulated sector was seen as the only way to truly meet policy objectives, especially for consumer protection.

Minimizing barriers to entry

The regulatory regime sought to avoid unnecessary burdens, especially for smaller/new operators, with proportionate due diligence and risk-based approaches to balance consumer protection and competition, including:

- Long notice periods to apply and to meet the licensing requirements
- Simplified licence application process, with education and support
- No requirement to leave the market for any period before licensing
- No penalties for prior infractions
- Minimal transition requirements, focused on the need to conduct new KYC (know your customer) and due diligence on all customers as they transitioned to the regulated site

Ontario allowed existing gray market operators to easily transition into the regulated market without punitive measures, provided they applied before the launch deadline, to make the market more attractive and reduce unregulated activity. The approach has attracted a diverse mix of operators.

Protecting consumers

Operators faced stringent standards, particularly in compliance, but the regime was outcome-based requiring operators to determine the best way to achieve compliance, rather than a prescriptive approach that details explicitly what is required to meet the regulatory objectives. This was challenging for less experienced operators but intended to encourage best practices. Key consumer protection measures included:

- Restrictions on mass-market bonusing and mandatory “opt-in” for incentives
- High standards for monitoring player behavior and mandatory risk profiles with intervention requirements
- Strong rules for sports integrity, reportedly exceeding many US states
- Adoption of a universal helpline (ConnexOntario) and requirement for inclusion in all advertising, resulting in greatly increased awareness and usage
- 0.05% of Gross Gaming Revenue (GGR) dedicated to responsible gambling advertising has anecdotally led to higher player engagement with RG tools
- Centralized self-exclusion system with the aim of moving toward a national solution

Key Learnings

Experts involved in opening the Ontario market recognized key learnings from policy and regulatory gaps at market opening.

Insufficient advertising restrictions

Ontario was caught off guard when operators conducted extensive advertising campaigns to acquire new customers, in part to make up for the restriction on bonuses and promotions. This resulted in the largest number of complaints the regulator had ever received. Advocacy groups and the public expressed concern around the content, volume, and placement of gambling ads, particularly as they were seen to be targeting young people, normalizing gambling through exposure to children and youth, and recruiting new customers rather than transitioning existing customers. The widespread nature of complaints was described by one regulator as imperilling the social license of online gambling in Ontario.

The initial regulatory framework underestimated this risk, and the public backlash led to new restrictions, particularly to protect youth (e.g., banning sports/culture celebrities with youth appeal in advertising). The regulatory response did not address volume, in part because the industry offered assurances that volume would decrease over time. Instead, it prioritized protecting youth from celebrity endorsements that would encourage and normalize online gambling. To date, the effectiveness of these restrictions has not been evaluated. Additional protections for youth are reportedly planned but have not yet been implemented.

Inadequate AML and crime prevention

While not initially prioritized, Ontario will be placing a much stronger emphasis on anti-money laundering (AML) and crime prevention in its online gambling regulatory regime. This is in response to the strong global focus on corporate crime led by the international body established to combat money laundering and other threats to the global financial system, the Financial Action Task Force (FATF), a response made more urgent by the pressing deadline of Canada's next mutual evaluation of its AML regime by the FATF in mid 2026.

Following its previous disappointing FATF assessment as well as multiple highly publicized AML failings, Canada is now fast-tracking substantial improvements to its AML regime. Amendments include increasing monetary penalties that Canada's financial intelligence unit (FINTRAC) can issue by 40 times the current amount and introducing a criminal offence for the provision of false, misleading, or incomplete information by a reporting entity to FINTRAC.

Complexity of driving economic development

Achievement of the economic growth policy goal has been complicated. While direct economic mandates were outside the regulator's role, there is some debate around the effectiveness of regulatory provisions.

Ontario's regulatory model aimed to make the province attractive to business through balanced regulatory requirements and supportive tax agreements. These efforts appeared to benefit

larger online operators; however, no significant provisions were made to support small businesses or local start-ups; recommendations for graduated fees and supportive measures were not adopted. Additionally, existing land-based operators did not feel there were sufficient efforts to support their transitions to online offerings, despite their more tangible economic benefits to communities and the province than those of online-only operators.

Inadequate research initiatives

Research initiatives to track changes in prevalence were reportedly mismanaged and never released publicly. The lack of prevalence and other research to understand the impact of opening the market was highlighted by one interviewee as an important gap needing attention.

Importance of regulatory independence

Interviewees stressed that regulatory independence is critical for public interest but can be challenging to achieve when the regulatory body is encumbered by a commercial mandate.

New Jersey, USA – Navigating National Prohibitions

New Jersey navigated national prohibitions on online gambling to achieve its economic development goals. In doing so, New Jersey led the United States in legalizing both forms of online gambling (sports wagering and iGaming), in creating interstate compacts to share information and product, and perhaps most importantly in building a source of ongoing scientific evidence to inform continuous improvement of its regulatory framework.

Background

New Jersey was one of the earliest US states to introduce land-based casino gambling in Atlantic City, with casinos opening in 1978 and reaching peak revenues in 2006 followed by a steady decline, as neighbouring states legalized their own casinos. State lawmakers regarded online casinos as a potential solution to capture lost revenue. Thus in 2013, New Jersey (NJ) was the first US state to legalize online casinos, despite federal prohibitions under the Wire Act.

In 2018 New Jersey won its long legal battle to overturn the Professional and Amateur Sports Protection Act (PASPA) which had made sports wagering illegal in almost all US states. NJ argued the legislation was an unconstitutional infringement of states' right to govern independently. This victory paved the way for other US states to introduce sports wagering, through land-based venues and online.

Objectives

New Jersey gambling market expansion is primarily driven by an economic development goal. Specifically, the goal was to drive economic development and job creation, and strengthen the market, not only in Atlantic City, which was a depressed urban area, but also the southern New Jersey region. Additionally, the state sought to address the economic impact of growing out-of-state competition for its land-based sites, where today 13 casinos or racinos are within ten miles of the border of New Jersey, stretching from Delaware and Pennsylvania, into New York State and New York City.

Regulatory Design

New Jersey's Division of Gaming Enforcement (DGE) is a law enforcement agency and the investigative arm of the casino regulatory system responsible for enforcing the *Casino Control Act*. The DGE is responsible for licensing, investigating, reporting, and testing of all casino slot machines, casino floor systems, and Internet gaming platform systems, as well as for the prosecution of all casino-related crimes. To regulate its expanded gambling market New Jersey developed a robust regulatory framework that has been modelled in other US states.

The model

When considering who would operate online gambling three models were considered. The chosen model mandated that existing land-based casinos had a monopoly on online gambling, which would serve economic development goals and make it easier to navigate the constitutional restriction on gambling being based in Atlantic City.

While alternative models may have generated more revenue for the state, policy makers believed NJ had more to gain from economic development and support of the existing land-based industry than from generating more state revenue. This included offering economic development incentives through the Governor's office to support local small and medium-sized businesses to participate in the online casino sector.

The tax rate

New Jersey sought to balance a fair return to the state with allowing the existing industry and the companies with which they would partner to be successful, generate revenue, and invest in innovation and job creation. To achieve this, they targeted a tax rate of 20% or under, including all fees and taxes. After several years at this rate, recent changes have pushed the tax rate to just over 20%.

Brands and skins

Policy makers struggled with the concept that one operator would develop multiple brands and websites, or skins, targeted at different segments of the online market. On the basis that it would build in additional consumer choice, a regulation was adopted that would allow multiple skins (not unlimited) for each operator. This has been well received, and most operators have not reached their limit.

Licensing requirements

As the regulatory model extended the existing land-based casinos' monopoly into online gambling, there was no change to existing licensing requirements. Casino operators had already undergone extensive due diligence and so were able to pay the fees and receive an Internet gambling license.

However, there was a great deal of additional work required to license other stakeholders. Service industry licensing was required for those companies that wanted to partner with casinos and participate in the gambling revenue in any way. This license has a high standard, described

by an interviewee as just below that of a casino license. Additionally, vendor registration was required for hundreds of new companies providing goods and services of more than \$20,000 annually. IT vendors have the additional requirement of undergoing testing in the Division of Gaming Enforcement (DGE) lab.

Interstate gambling markets

Online casino gambling in the US was initially restricted within each state using geofencing, however following a Justice Department decision, this was changed. No longer restricted, New Jersey created a compact of jurisdictions with legal iGaming, to share information but also to share product.

In October 2017, New Jersey, Delaware, and Nevada signed the *Multi-State Internet Gaming Agreement* allowing players to compete in online poker and some casino games across all three states. Although this compact has been used for sharing information, it has not been fully used for sharing product. This may change in the future related to poker, progressive slots and progressive lottery games.

Built-in scientific evidence

At the insistence of the Governor, the new regulatory framework included a requirement for the Division of Gaming Enforcement (DGE) to conduct an annual review of industry performance and its associated harm to customers. Funding for the research was built into the taxation and fees levied on the industry and paid to the DGE, which would then fund the research.

DGE sought an academic institution that would conduct the research and subject it to peer review and publication. An RFP awarded the work to the Center for Gaming Studies at Rutgers University, led by Dr. Lia Nower. DGE worked with Dr. Nower to determine what data and information was needed to do this research. This led to the decision to require that all online gambling operators provide their player data annually.

Beginning in 2014, Dr. Nower and her team began a body of research on gambling in New Jersey that includes two prevalence studies, two studies of sports wagering, and seven years of analyses of player data submitted by every online operator in New Jersey. This research examines changes and trends in play behaviour, player profiles, use of RG tools, and problem gambling risk and harm. Insights from this research are translated into policy recommendations to the DGE, driving policy decisions in New Jersey and globally.

New Jersey has had a tremendous impact on the evolution on online gambling in the US. However, only a few states have followed its lead in establishing academic hubs to monitor trends and enable data- and research-driven recommendations to improve regulation.

Advertising restrictions

For the first two years of operation, the Division of Gaming Enforcement (DGE) required that no marketing campaign could be published anywhere until it was pre-approved by the regulator. This was partly in response to observing the European landscape, where advertising that would

have violated consumer protection laws in the US was tolerated in parts of Europe. This requirement entailed a difficult workload for regulatory staff members but was designed to educate the industry on expectations in the US and the regulator on industry practices. After two years the DGE transitioned to an auditing provision whereby a percentage of an operator's advertising was audited annually. The DGE additionally published new standards on complying with truth-in-advertising and consumer protection laws.

The advertising framework is an ongoing issue requiring constant monitoring. The DGE frequently contacts operators and directs them to take down campaigns that do not meet the published standards, including predatory bonus offers. Efforts to work with the Department of Consumer Affairs were not particularly successful, because the issue has not been seen as a high priority to date.

To enhance advertising regulations and enforcement, the DGE is recommending:

- Require ancillary licensing of marketing and affiliate marketing companies
- Get Consumer Affairs departments on board early in the process
- Aggressively monitor and prosecute infractions
- Push for federal action on social media platforms as advertising has largely shifted to social media

Key Learnings

Experts involved in opening New Jersey's online market described key learnings from their ongoing experiences.

Take your time

The online gambling industry is very much in its early stages in the US and North America. It is a complex and dynamic industry, populated by technology companies which are significantly different from traditional gambling companies. It is important to approach potential expansion thoughtfully and responsibly, and to avoid putting artificial deadlines on the development and implementation of an eventual regulatory framework.

Economic goals are difficult to achieve

In New Jersey online gambling saved the casinos from closing. However, broader economic development goals were not fully realized, such as job creation and community revitalisation and development. This may be due to many factors including the inherently small footprint of online gambling companies, as well as poor business deals with technology partners.

In short, the local industry was not prepared for online gambling. Local operators were approached by many new companies coming into the US, mostly from Europe. Interviewees suggested local operators engaged in business agreements that favoured short-term profits rather than long-term economic benefits.

Interviewees cautioned other states to be realistic about economic potential, which is heavily influenced by the size of the market.

Consider distinctions among online forms

The three main types of online gambling – sports wagering, casino, and lottery – each have different historical structures and revenue-generating or economic development potential. It is beneficial for policy makers and regulators to carefully consider these differences ahead of any new market expansion.

Online casino generates considerably higher revenues than online sports wagering and is far more profitable for operators. Some experts believe the industry push for legalisation of online sports wagering has been driven by operators' ultimate goal of offering online casino games.

Online lottery games are offered in many states where online casino remains illegal. This may be because lottery games have historically been associated with lower risk and are typically managed entirely by the state, both of which considerably reduce the burden of legalization. However, online lottery games increasingly resemble and provide a similar customer experience to casino games. This is important to consider from two perspectives. For one, offering online lottery can be a viable alternative to online casino that allows the state to keep more revenue and avoid competition from online casino operators. On the other hand, it is important to recognize the evolving risk profile of online lottery games, particularly as the minimum age to participate is generally 18 (versus 21 for casino gambling and sports wagering).

Importance of a testing laboratory

New Jersey has a dedicated lab staffed by 60 employees to conduct testing and certification of gambling machines, software, hardware, and related technology for fairness and integrity. This is not the standard approach and was resisted by the two companies that dominate the market to provide such testing and certification for compliance with regulations and standards, namely *Gaming Laboratories International* (GLI) and *bmm Testlabs*. The standard business model is for the certification to be paid for and provided directly to the manufacturer of the product or service which is then submitted to regulators.

New Jersey required the two companies to be licensed in New Jersey and to conduct any testing on behalf of the State rather than for the manufacturers because the DGE believed the standard business model for certification is a conflict of interest. In addition, establishing a dedicated lab in NJ kept this skilled work in the state, and provided a source of ongoing learning for the regulator on industry techniques and innovation.

Address unregulated markets

Even in a well-regulated mature market, the black market continues to exist. According to the former regulator, research shows that most New Jersey residents who gamble appear to do so on licensed sites. However, the Division of Gaming Enforcement (DGE) has worked with law enforcement to collect evidence of the black market which includes companies that were previously licensed in New Jersey, indicated they exited the market, but continue to engage with customers through the black market. This was described as a constant battle, almost impossible to prosecute – despite evidence from databases and intelligence from law enforcement –

because the operators are usually based offshore, requiring federal action to pursue them in a foreign country. In addition, the technology companies facilitating and enabling the black market (e.g., Meta, Google, platform providers, etc.) are protected from State action under federal laws.

To address the black market as much as possible, the DGE requires supply chain transparency and compliance requirements whereby licensed operators must sever their relationship with any black-market operator or supplier.

In addition to typical black market gambling operators, regulators must consider the range of unregulated gambling-like activities, such as sweepstakes and prediction markets. Gambling operators are increasingly offering these unregulated activities in addition to licensed gambling. These activities are heavily marketed and experiencing substantial growth that is likely cannibalizing licensed gambling and reducing related tax remits by the operators. At the time of publication (December 2025), New Jersey is in the process of prohibiting sweepstakes and some other gambling-like activities.

The New Jersey Experience

The review of research on online gambling prevalence and behaviors conducted in the state of New Jersey provides insight into the real impacts of regulated online gambling in a mature market, which may be useful to consider as Massachusetts determines its path forward.

New Jersey (NJ) was one of the earliest US states to introduce land-based casino gambling in Atlantic City, with casinos opening in 1978 and reaching peak revenues in 2006, followed by a steady decline as neighboring states legalized their own casinos. State lawmakers regarded online casinos as a potential solution to capture lost revenue. Thus in 2013, NJ was the first US state to legalize online casinos, despite federal prohibitions under the Wire Act. In 2018, NJ legalized sports wagering after winning its long legal battle to overturn the *Professional and Amateur Sports Protection Act (PASPA)* which had made sports wagering illegal in almost all US states.

Section Summary

- Individuals who gamble in mixed venues (both land-based and online) have the highest rates of problem gambling, followed by those who gamble online only.
- There are notable increases in women gambling online, and in the number of gambling activities young adults participate in.
- Low-income individuals and students are the biggest online gamblers.
- Additionally, those who identify as Asian, Black/African American, and Hispanic are overrepresented among those who gamble online.
- Black/African Americans were most likely to be high-risk problem gamblers (15.9%).
- Emerging adults (18-24) gamble at higher frequency and have higher rates of problem gambling risk.
- Young people under 21 who gamble illegally had the highest average PGSI scores and the highest rates of high-risk problem gambling (nearly 37% reporting symptoms).
- More than 70% of young sports bettors place in-game bets, the riskiest form of sports wagering.

This section presents findings from the three types of reports published by the Division of Gaming Enforcement (DGE):

- **Participation & Risk** – *population* prevalence studies conducted in 2016 and 2021
- **Online Casino Gamblers** – *player* data collected and analyzed annually 2016 to 2021
- **Online Sports Bettors** – *player* data collected and analyzed annually from Q2 2018 to 2020

Participation & Risk

This section examines population prevalence data collected in 2016 and 2021. The two prevalence reports (Nower et al., 2017, 2023) provide comparative information on a number of

socioeconomic and demographic characteristics, gambling behaviors, and gambling risk among individuals who gamble online. In addition, a sub-sample of emerging adults from the 2021 survey was analyzed and compared to the general population on a range of measures of risk and problems.

Taken together, the findings suggest that specific subgroups of those who gamble have increased not only their gambling participation but also their preference for online and mixed venue gambling, which are associated with higher rates of problem gambling.

Impacts on 2021 Data

Overall, the two surveys were similar enough in design and execution to provide robust comparisons on key indicators. However, operational shutdowns in 2020 (due to the COVID-19 pandemic) undoubtedly had some effect on the findings of the data collected in 2021, as the proportion of those gambling overall dropped slightly, remaining at around 70% of New Jersey residents, despite the introduction of online sports wagering. Despite this caveat, the proportion of those gambling exclusively online nearly tripled from 5% in 2016 to nearly 15% in 2021, and those reporting mixed venue gambling (both online and in land-based venues) nearly doubled from about 19% to 36%. This suggests that, despite the shutdowns, residents were quick to transition from land-based only gambling, which decreased significantly from 76% to 49%, to online forms of gambling.

Gender

Overall, a higher proportion of men compared to women gambled both online and in mixed venues (i.e., both online and in land-based venues) in both studies. However, the change in participation rates were greater for women. From 2016 to 2021, women gambled online-only at about four times the rate of the prior survey, increasing from about 3% to 13%. Men's online-only participation more than doubled, from 7% to 17%. Similarly, for mixed venue gambling, men's participation increased by 19% and women's by 14% over the prior survey.

Age

Individuals were classified into age categories for the full report, then reclassified for deeper supplemental analyses based on age. In the full sample, increases in gambling participation were particularly notable among those in the 18 to 24-year age group, who posted the highest increases of any age group, gambling on an average of just over two gambling activities in 2016 and over four activities in 2021.

Ethnicity

By race/ethnicity, individuals identifying as Asian were overrepresented in both studies among those who gambled online only. In addition, there were significant over-representations in the 2021 findings, with individuals identifying as Black/African American overrepresented among those gambling in mixed venues and individuals identifying as Hispanic overrepresented among those gambling both online only and in mixed venues.

In 2021, more than half of those gambling only online were White (61.3%), although proportionate adjustments found those identifying as Asian American/Pacific Islander or “Mixed/Other” race were slightly overrepresented among online-only gamblers. Whites were significantly overrepresented among non-problem gamblers (72.8%). In addition, Whites made up the highest proportion of land-based gamblers (associated with the lowest levels of problem gambling), with about 53% of all Whites who gambled doing so only in land-based locations. In contrast, Black/African Americans reported the highest proportion of past-year gambling (62.2%), slightly more than Whites (61.6%) and those who identified as “Mixed/Other” race (60.1%), followed by Asian American/Pacific Islanders (57.2%). About 63% of those with Hispanic ethnicity reported gambling. Notably they were overrepresented among both the online-only (18.3%) and mixed-venue gambling groups (41.2%).

Employment Status & Income

Students were significantly more likely than expected to gamble only online. Those employed full-time were significantly more likely than expected to participate in mixed venue gambling. In 2021, those making less than \$15,000/year were over-presented among those gambling only online (they also reported the highest rates in 2016 but the difference was non-significant). In addition, those reporting very low incomes, as well as students, continue to endorse the highest rates of online gambling, underscoring the need for operators to use affordability safeguards to identify those who are likely spending beyond their means.

Frequency

Mixed venue players were overrepresented among those betting at high frequency (once a week or more) in both surveys. In 2016, online-only players were overrepresented among high frequency players but, in 2021, they were only overrepresented among moderate frequency players. There were also slight differences by gender in gambling frequency between the two surveys, with slight increases in low-frequency and decreases in high frequency for women and increases in the moderate-frequency group for men following the introduction of sports wagering.

Age and high frequency gambling

Notably, there were no significant differences among play frequencies across age groups, except for those aged 18 to 24; in 2021, nearly 35% of those emerging adult players gambled at high frequency, followed by about 29% who gambled at moderate frequency. These proportions were similar to those found in 2016. Younger high-frequency gamblers were overrepresented in their participation in all gambling activities except lottery, instant scratch-off purchasing, and gaming machines (slots, video poker). Further analyses and findings using a sub-sample of emerging adults are included below.

Gambling Risk & Problems

In both studies, nearly 70% of those who gambled did so without endorsing symptoms of at-risk gambling. Among those at-risk, a few notable findings emerge.

Frequency and mode of access are associated with risk

Among those at-risk, gambling on more activities and betting at higher frequency were associated with higher levels of problem gambling across both surveys. Also consistent across both reports, individuals who gambled in mixed venues had the highest rates of problem gambling, followed by those who only gamble online, followed by those who gambled only in land-based venues. Notably, those who gambled in mixed venues averaged gambling on six different activities, compared to land-based only players, who bet on an average of two activities.

The data suggest there is an additive effect to additional products and their relationship to risk: the more things people gamble on, the more frequently, and the more ways they have to gamble (i.e. online, land-based) the higher the rates. In addition, the risk for problem gambling goes up as one moves from land-based gambling only to online gambling only to mixed venue (both land-based and online), which has the highest rates.

Race/ethnicity differences are associated with risk

Between 37% and 39% of non-Whites who gambled reported some level of a gambling problem, with Black/African Americans most likely to be in the group at high risk for problems.

Nearly half of Black/African Americans gambled in mixed venues, which is associated with the highest rates of problem gambling. It follows, therefore, that Black/African Americans were most likely to be high-risk problem gamblers (15.9%), paralleling findings in the 2016 prevalence study Endorsing the “Mixed/Other” racial category was disproportionately associated with moderate-risk gambling (14.0%).

Hispanic ethnicity also was associated with a higher likelihood of moderate- and high-risk problem gambling; 60% of those identifying as Hispanic were non-problem gamblers but nearly 9% were moderate- and 15% were high-risk problem gamblers.

PG risk and comorbid conditions

Those who gambled in mixed venues (associated with the highest rates of problem gambling) had significantly higher rates of tobacco use, alcohol use, binge drinking, illicit drug use, and alcohol or drug use problems. Online-only gamblers had significantly higher rates of binge drinking when compared to those gambling only in land-based venues as well as higher rates of all potentially addictive behaviors, though the difference in the latter was not statistically significant. In addition, those who gambled in mixed venues had significantly higher rates of mental health problems, anxiety, and depression when compared to individuals who only gambled at land-based venues or only online. Compared to land-based gamblers, those who gambled only online also had significantly higher rates of moderate mental health problems. In addition, mixed-venue gamblers had significantly higher rates of suicide attempts and non-suicidal self-injury when compared to all other gamblers, and mixed-venue and online-only gamblers had significantly higher rates of morbid thinking and suicidal ideation, compared to land-based gamblers.

High-risk problem gamblers

Among those who gamble, the percentage at high-risk for problems was about 9% in both studies. Overall, in the New Jersey studies, the rate of high-risk problems was three times the rate in the general sample but, among those who gambled, about 1 in 11 players gambled at high risk. There were differences between the proportions of low- and moderate-risk problem gamblers, which both increased slightly between the two studies; from a public health perspective, movement along the spectrum away from recreational toward problem gambling is of particular interest across studies. Also of interest, in the 2016 study, those in the higher problem gambling risk groups gambled at significantly higher frequency; in contrast, in the 2023 study, there was no significant correlation of problem gambling risk to frequency of play. This could suggest that, in 2021, individuals with higher levels of problems were gambling less often but possibly spending more when they bet. Notably, in 2021, those aged 18 to 24 were the most likely to be high-risk problem gamblers (19%) including those who are not of legal age to gamble in New Jersey. Further analyses and findings using a sub-sample of emerging adults are included below.

Low- to moderate-risk gamblers

There were differences between the proportions of low- and moderate-risk problem gamblers, with both increasing slightly between the two studies. From a public health perspective, movement along the spectrum away from recreational toward problem gambling is of particular interest across studies.

Emerging Adults

In New Jersey, the legal age for purchasing lottery or scratch-off tickets or betting on horse races is 18; all other activities require bettors to be 21. A sub-sample of 591 emerging adults, ages 18 to 27, from the 2021 survey was analyzed and compared with the general adult population. In addition, the sub-sample of emerging adults was further divided into three groups to examine *differences between emerging adult groups*. All of these comparisons are reported below.

Gambling behaviors

About half of the emerging adult sample reported gambling in the past year (50.99%), with lottery tickets (23.78%) remaining the most popular form of gambling, appealing to nearly one-fourth of emerging adults, followed by scratch-off tickets (22.82%), high-risk stocks (20.43%), and games of skill (19.38%). Less than 15% of the sample participated in the remaining gambling activities. The average emerging adult who gambled (n=301) in the prior year, wagered on four activities. Participation was proportionately divided, with about a third wagering at low (less than monthly), moderate (one to three times/month), and high (weekly or more) frequency. About 42% of participants gambled both online and at land-based venues (i.e., mixed venues), 32% gambled online only, and 26% gambled only in land-based venues. The high rates of risk are likely due in part to the higher proportion of emerging adults gambling online compared to the general population, both for mixed venue gambling (8% higher) and online only gambling (22% higher).

Risk and problem gambling

The average emerging adult who gambled in the 2021 study had a PGSI score of 3, consistent with moderate-risk gambling, however the standard deviation was large (5.34), characteristic of a wide range of risk. Overall, about 61% of emerging adults who gambled did not endorse any problem gambling symptoms. However, 13% of the sample scored at low risk, 8% at moderate risk, and 18% at high risk for problem gambling. Given that high-risk problem gambling is associated with gambling disorder, the findings suggest that a substantial proportion of emerging adults who gambled could be gambling at disordered levels.

The high rates of high-risk gambling among emerging adults may be influenced by the high rates of participation by emerging adults in activities with gambling-like components, with social casino gaming (31.80%) and purchasing loot boxes in video games (23.05%) the most popular activities. Statistical analyses revealed that gambling frequency, problem severity scores for gambling, alcohol, and drugs, and the number of addictive behaviors endorsed was significantly associated with each of these gambling and gambling-like activities. The largest associations were between gambling frequency and high-risk stock trading, esports betting, and cryptocurrency trading, as well as between esports betting and PGSI score. Additionally, cryptocurrency trading, esports betting, skin betting, and social casino gaming were associated with depression and anxiety scores. Esports betting, skin betting, and social casino gaming were associated with perceived stress scores. In addition, cryptocurrency trading, esports betting, skin betting, and social casino gaming were significantly associated with morbid thinking, self-harm behaviors, suicidal ideation, and suicide attempts. High-risk stock trading was associated with suicidal ideation and attempts. Loot box purchasing was not associated with any of these.

Finally, analyses of the interaction effects between age and other risk factors for problem gambling found that being male, gambling in mixed venues, reporting family member substance misuse, and moderate or high frequency of gambling participation with family members during childhood or adolescence were associated with higher risk among emerging adults versus their older counterparts.

Differences between emerging adult groups

Emerging adults who gambled were divided into three categories:

1. Under 21 gambling *illegally*⁷ (i.e., on activities other than lottery, scratch-offs or horses) – 15% of the sample
2. Under 21 gambling *legally* – 9% of the sample
3. 21 and over gambling legally – 76% of the sample

Across all emerging adults, the group under 21 gambling illegally reported gambling the most frequently, across more venues, and on the highest number of activities. They also had the highest average PGSI scores and the highest rates of high-risk problem gambling, with nearly

⁷ The survey did not include questions on legal versus illegal gambling. Rather, participants under age 21 who reported gambling on any activities other than lottery and horse racing, the only two legal activities for those 18 to 21 in New Jersey, were classified as gambling illegally.

37% reporting symptoms analogous to those for gambling disorder; only 38% of this group reported no problem gambling symptoms at all. In contrast, no participants in the group under 21 who gambled legally endorsed high-risk gambling.

Among those 21 and over gambling legally, about 17% were gambling at high risk. This was less than half the rate of the younger emerging adults, those under the age of 21, who were gambling illegally. Overall, the rate of high-risk gambling among those under 21 gambling illegally was six times higher than the rate of high-risk problem gambling in the total sample population, and among those 21 and over, this rate of high-risk problem gambling was two times higher than that of the total population.

Protecting emerging adults

Taken together, findings from the analyses of emerging adults in the 2021 prevalence study revealed that a significant proportion of emerging adults, including those who were underage, were gambling online and in mixed venues; both behaviors are associated with higher risk for developing serious gambling problems. Compared to all participants who gambled, about three times as many emerging adult gamblers endorsed multiple problem gambling symptoms.

The influence of family and household members who engage in addictive behaviors is predictive of future gambling problems and suggests that prevention efforts should focus on family systems, particularly targeting parents and siblings who gamble. Education, prevention, and policy initiatives targeting these risk factors are critical to decrease the harm that could result from initiation and problem symptoms at an early age as this group moves into middle adulthood, when gambling participation is typically at its highest levels.

Online Casino Gamblers

Reports covering six years of player data from all online gambling operators in New Jersey provide a rich source of evidence on the evolution of online casino gambling in New Jersey (Nower, 2015; Nower, Cho, et al., 2019, 2020b, 2020a; Nower et al., 2018, 2024a)

Age & Gender

Most New Jersey iGaming operators collect data on age and gender but not ethnicity, though two sizeable operators fail to capture data on gender. Overall, the mean age of online casino players has decreased since the first analyses of 2014 data, dropping from a high of nearly 41 years in 2018 to about 37 years in 2021. There has been a slight increase in those aged 35 to 44, which comprise nearly a quarter of all those who gamble in online casinos. There have also been slight decreases in older online casino players and increases in younger online casino players. These shifts coincide with the advent of online sports wagering in New Jersey, which traditionally appeals more to younger men; it is, therefore, possible that younger bettors, particularly those aged 25 to 34 years, initiate gambling on sports wagering platforms and subsequently open iGaming accounts, given that New Jersey offers both forms of online gambling. However, the proportion of those players in the youngest legal age category for iGaming, 21 to 24 years, has varied without a discernible pattern between 9% and 14% across

data collection years. By gender, the proportion of women gambling online has always been significantly lower than men, however, that proportion has dropped about 9% across five years, while the proportion of men gambling online has increased by about 12%.

High Intensity Players

For the purposes of the New Jersey reports, high intensity players are identified as those registering the highest average total of yearly bets, the highest average total betting days, and the highest total average amount bet over the course of a year.

Overall, the proportion of men who are classified as high-intensity online casino players has steadily increased and the proportion of women has decreased, each by about 12% over the five-year period of 2016 to 2021. Women are, on average, older (mean=49.5 years) compared to men, who averaged about 46 years. Most recently, about half of the men were older and half were younger than 45 years; however, more than 65% of women were older than 45 years. Over the years, online gambling has increased in intensity; players continued to wager on more sites and on more days, and to bet higher amounts, including average maximum, single and total yearly wagers.

Use of RG Features

The proportion of online casino players using responsible gambling features on iGaming sites generally varies between 4% and 6% across years without a consistent pattern. Uptake remains low, particularly among the youngest players, aged 21 to 24, where RG feature use has ranged from about 2% to 5% across years. Feature use among this group is typically the lowest of any age group in any given year. Similar to trends with high intensity players, the proportion of women using RG features has steadily declined across years while the proportion of men has steadily increased; over five years, the decrease/increase in participation by women and men, respectively, has been about 10%.

The low uptake of RG features is likely due to a number of factors, including the continued use of an opt-in rather than opt-out system; the lack of one integrated platform with consistent messaging, education and information for all players irrespective of vendor choice; and the lack of publicity, incentives, or outreach to encourage participation. These challenges are even more concerning considering that, across all years, those who do choose to use RG features report gambling on fewer sites for fewer days, placing lower average maximum, single and total year wagers, and placing fewer bets in total during the year.

Sports Bettors

New Jersey legalized sports wagering in 2018 and launched officially in June of that year, hosting about 154,000 players in the first six months and increasing steadily every year to a high of 343,000 in 2020, the last full data set examined in this report. This section examines data from 154,000 individuals who wagered on sports in 2018, 2019, and 2020 (Nower et al., 2024b; Nower, Stanmyre, et al., 2019, 2020). These reports provide comparative information on

participation, gender, age, and gambling intensity among individuals who wager on sports. Where possible, characteristics of younger sports bettors are highlighted separately.

Participation Growth

Patterns of participation differed significantly in the first two full years of legalized sports wagering – 2019 and 2020. In 2019 the number of bets per month shifted from a low in the month of July to a high in November/December, however the average total number of bets placed by month was consistently under 5 million bets. In contrast, betting in 2020 was triple that amount – about 15 million bets per month – before decreasing sharply in April and May then steadily increasing to above 25 million bets per month by the end of the year. That rate was five times the average posted in 2019. Standard parlays emerged as the favorite bet type among players across years, representing about 76% of all bets placed.

Gender

Across all three years, a majority of those who wagered on sports – about 87% – were men, though gender data was only available for about two-thirds of the sample. Men and women had similar betting patterns, though men placed larger mean wagers on traditional sports (i.e., NBA/pro basketball, NFL/pro football, MLB/pro baseball, college basketball, college football, soccer, and NHL/pro hockey), and women placed larger mean wagers on non-traditional sports (i.e., golf, ping pong, NASCAR/motor sports, field hockey, and darts). Notably, women have consistently placed a higher proportion of bets in-game, though men continue to wager more when they bet.

Age

By age, the proportion of players remained relatively consistent across both studies, with the highest proportion of bettors – about 41% – aged 25 to 34, followed by the 35 to 44 age group (average of 22%), and the 21 to 24 category (averaging about 16% of bettors). There were increases in the lowest age category, ranging from 14% to 18%, and in the oldest age category (65+) which increased from under to slightly over 2%.

In contrast to gender differences, preferences for sports tended to vary more across age groups. All age categories demonstrated a clear preference for betting on NFL/pro football, particularly those aged 21 to 24, who placed nearly one-third of all their bets on football in 2020. NBA/pro basketball was the next most preferred sport across ages, particularly those aged 21 to 24 (23.6%). An exception was 45 to 54-year-olds (14.3%), who placed a larger percentage of bets on soccer (15.6%). Notably, older bettors (55+) were more likely than younger bettors to bet on MLB/pro baseball, college basketball, and college football, while those who were younger (21 to 34) preferred boxing/MMA and golf.

In general, the average bet size was lowest among the youngest (21 to 24) and oldest (65+) bettors. The youngest bettors placed higher bets on tennis, ping pong, cricket, and darts, and the oldest bettors placed higher bets on boxing/MMA and college football.

Young sports bettors engage in riskier forms

One of the most notable differences between younger and older sports bettors is the preference for in-game betting, that is, placing bets after a game has started on various elements of the game with changing odds. In-game betting is only legal in some states, largely due to the concern it could lead to impulsive overspending due to the changing nature of the odds and the possible influence of alcohol, peers, and emotional involvement as a fan. In New Jersey about 20% of all bets placed and just under half of money wagered happens in-game.

More than 70% of the youngest bettors (21 to 24 years) have placed at least one in-game bet in any year, the highest percentage of any age category. In addition, a significant proportion of the youngest bettors bet primarily in-game, though the proportion fluctuated between about 22% in 2019 to just over 10% in 2020, likely impacted by COVID-19 shutdowns. Despite the decrease, the percentage of 21 to 24-year-olds betting primarily in-game was either the highest (2018, 2019) or second highest (2020) of any age category.

High Intensity Bettors

The New Jersey reports characterize players who place the highest number of yearly bets, bet for the most days, and place the highest total amounts of bets over the year as 'high intensity' bettors. While men made up more than 90% of high intensity bettors, women were still overrepresented in that group, with the proportion of high intensity women bettors more than doubling in 2020 from 2019, and trending slightly younger over time.

In 2020, those in the 25 to 34 age category made up the largest percentage of high-intensity bettors (39.6%), followed by 35 to 44-year-olds (26.1%). Notably, the youngest bettors (21 to 24) comprised only about 11% of those betting at high intensity. However, that proportion quadruples as bettors age up to the 25 to 34 category. This suggests the transition across time is critical to monitor and evaluate to better understand the risk factors and possible causes of the significant escalation.

Use of RG Features

New Jersey regulations offer several types of responsible gambling (RG) features to those who gamble online, including time, spend, and deposit limits, 72-hour cool-off, and three terms of self-exclusion (1 year, 5 years, lifetime). Overall, uptake of RG features has been very low, ranging between 2% and 5%, likely due to the absence of a requirement that features be explained and introduced at sign-up and that use of features be an opt-out versus an opt-in system. Ideally, regulations would prescribe default limits that a player could change or remove after brief education. However, the current system merely lists the offerings, without explanation, on the mandated RG page that most bettors never visit.

Overall, a higher percentage of women compared to men use RG features (about 7% versus 4%), and 42% of those who used features were in the 25 to 34 age group, followed by those ages 35 to 44 (24.9%). Across all years, those in the youngest age category (21 to 24 years) have been the least likely to use RG features (2.6% in 2020), followed by those in the oldest category (65+, 3.5% in 2020).

Younger Bettors

As described throughout the section, when compared to the adult population bettors aged 21 to 24 have a distinct profile. Specifically they:

- Make up the third highest proportion of sports wagers (16% of all bettors)
- Placed nearly one-third of all their bets on football in 2020
- Placed 23.6% of their bets on NBA/pro basketball
- Have the lowest average bet size, but place comparably high bets on tennis, ping pong, cricket, and darts
- Have the highest percentage of bettors who placed at least one in-game bet (70%)
- Just over 10% bet primarily in-game in 2020 (the riskiest form of sports wagering)
- Are the least likely to use RG features (2.6% in 2020)

Based on multiple years of data and research, Rutgers CGS researchers have noted an additional hypothesis related to young sports bettors. Data suggest that operators may be using advertising and other promotions to triage younger bettors from sports wagering products to their iGaming products, which are significantly more profitable. This has likely contributed to observed downward changes in the average age of online casino gamblers. More importantly, this would be a cause for concern as data indicate that online casino gambling is associated with increased risk.

The Massachusetts Context

Beginning in 2013, the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study is a comprehensive, multi-year research program to understand the social and economic effects of the introduction of casino gambling in Massachusetts and make evidence-based recommendations to legislators. Secondary analyses of recent SEIGMA data (2022-2024) provide insights into current gambling behaviors and trends in the state, including vulnerable populations, to provide important context for any potential gambling expansion in Massachusetts. Methodological details of the surveys are provided above in the *Methodology* section of this report. Panelists who had engaged in one or more gambling activities in the past month were included in these analyses.

Massachusetts currently offers land-based casino gambling through two casinos,⁸ and one slots venue; sports betting, which launched in land-based venues in January 2023 and online in March 2023; and a state lottery, with online lottery due to launch in 2026.

Section Summary

- Monthly online gamblers have higher levels of participation and problems, are more likely to be classified at high- or very high risk, and to have experienced all types of gambling harm, compared to non-online gamblers.
- Monthly online sports bettors were more likely to be male, aged 25-34, have annual household incomes over \$100,000, and to have a graduate or professional degree, compared to online non-sports gamblers.
- Monthly online sports bettors were more likely to have experienced gambling problems and gambling harms with the greatest differences for family/relationship harms, financial harms, and emotional/psychological harms compared to online non-sports gamblers.
- Monthly young gamblers (18-24) were more likely to be male in 2022, but more likely to be female in the Fall 2024 survey.
- Monthly young gamblers were increasingly more likely to be non-White with increases greatest among Black young adults.
- Monthly young gamblers were more likely than all monthly gamblers to have experienced gambling problems and gambling harms, particularly work/school harm.

Findings are organized in three sections:

- **Comparing Monthly Online & Non-Online Gamblers**
- **Comparing Online Sports Bettors & Online Non-Sports Gamblers**
- **Emerging Adult Gamblers**

⁸ In addition to two commercial casinos regulated by the MGC, the Mashpee Wampanoag Tribe opened a gambling facility in Taunton called First Light Casino. The facility currently has 200 slot machines and is open from 10am to 2am daily (<https://www.firstlighttaunton.com/>). The daily operations of the facility are overseen by the Mashpee Wampanoag Tribal Gaming Commission.

Each section reports demographic characteristics, gambling behavior, gambling problems and harms, and awareness of prevention efforts.

Comparing Monthly Online & Non-Online Gamblers

This section presents information about changes in gambling behavior and problem gambling prevalence among monthly gamblers across the four online panel surveys carried out in Massachusetts between 2022 and 2024. The focus in this section is on similarities and differences between monthly gamblers who have not gambled online compared with monthly gamblers who have gambled online. Panelists who had gambled online, including playing poker, buying lottery tickets, betting on sports, bingo, slots or casino gable games for money or played interactive games for money were classified as ‘online gamblers.’

Demographic Characteristics

Results from four online panel surveys carried out in Massachusetts between 2022 and 2024 reveal varying degrees of differences in gender, age, ethnicity, household income, and education among online vs. non-online gamblers (see Figure 2).

Gender differences among monthly non-online gamblers in the panels were small with these gamblers about equally likely to be male or female. Differences in gender among monthly online gamblers in the panels were much larger with monthly online gamblers much more likely to be male than female across all four panels.

With respect to **age**, monthly non-online gamblers in all four panels were quite similar to the entire adult population of Massachusetts with a higher representation of individuals aged 65 to 79 in the two 2024 panels compared with the 2023 panel. The age distribution among monthly online gamblers was different from monthly non-online gamblers in terms of the proportion of the group in each year aged 25 to 34 and 35 to 54. Monthly online gamblers were much more likely than monthly non-online gamblers to be in these two age groups.

Looking at **ethnicity**, the similarities between the adult Massachusetts population and the monthly non-online gamblers are clear with higher proportions of Hispanics in the 2023 and Fall 2024 panels compared to the 2022 and Spring 2024 panels. In contrast, monthly online gamblers were nearly two times more likely to be Hispanic compared to monthly non-online gamblers and the adult Massachusetts population.

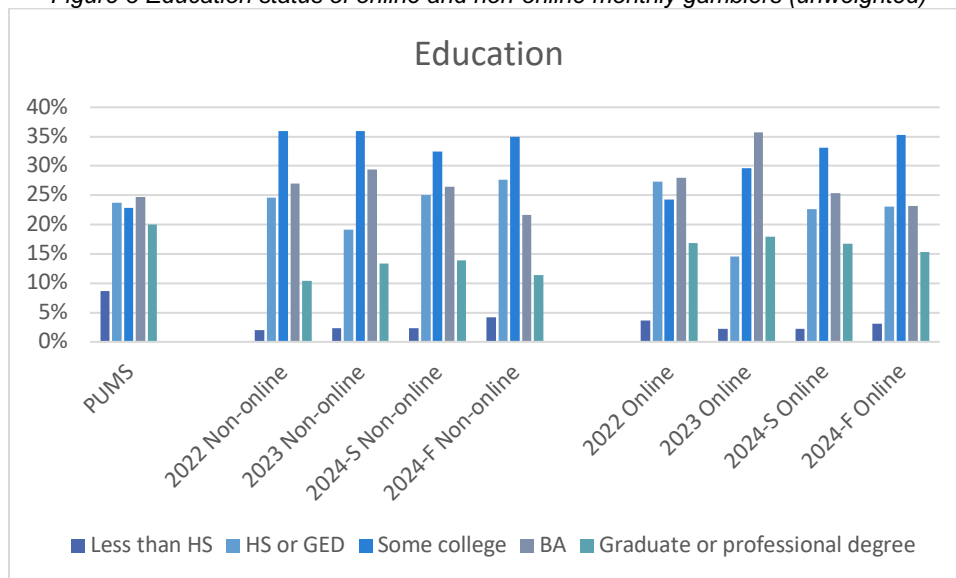
Figure 2 Demographic characteristics of online and non-online monthly gamblers (unweighted)



With respect to **annual household income**, there was a stark difference between both the monthly non-online gamblers and the monthly online gamblers compared to the adult Massachusetts population in the proportion of each group with household incomes of \$150,000 or more annually. While this is the largest income group in the Massachusetts population, both of the monthly gambling groups (online and non-online) were most likely to have annual household incomes between \$50,000 and \$100,000. Monthly online gamblers were more likely than monthly non-online gamblers to have annual household incomes between \$100,000 and \$150,000.

Finally, in terms of **education**, both groups of monthly gamblers (online and non-online) were less likely than the adult Massachusetts population to have obtained a graduate or professional degree. Monthly non-online gamblers were about half as likely as the adult population to have obtained a graduate or professional degree (10%-14% compared to 20% in the population). While monthly online gamblers were also less likely than the adult Massachusetts population to have obtained a graduate or professional degree, the difference was smaller (15%-18% compared to 20%). Monthly non-online gamblers were substantially more likely than the adult Massachusetts population to have obtained some college education and about equally likely to have graduated from college. Differences in educational attainment were smaller for the monthly online gamblers compared with the adult Massachusetts population.

Figure 3 Education status of online and non-online monthly gamblers (unweighted)



Gambling Behavior

Findings from the four panel surveys carried out in Massachusetts between 2022 and 2024 additionally reveal important differences in the gambling activities of online versus non-online gamblers (see Figure 3). Differences between the two groups of gamblers are not adjusted to control for the likely greater gambling involvement of the online gamblers.

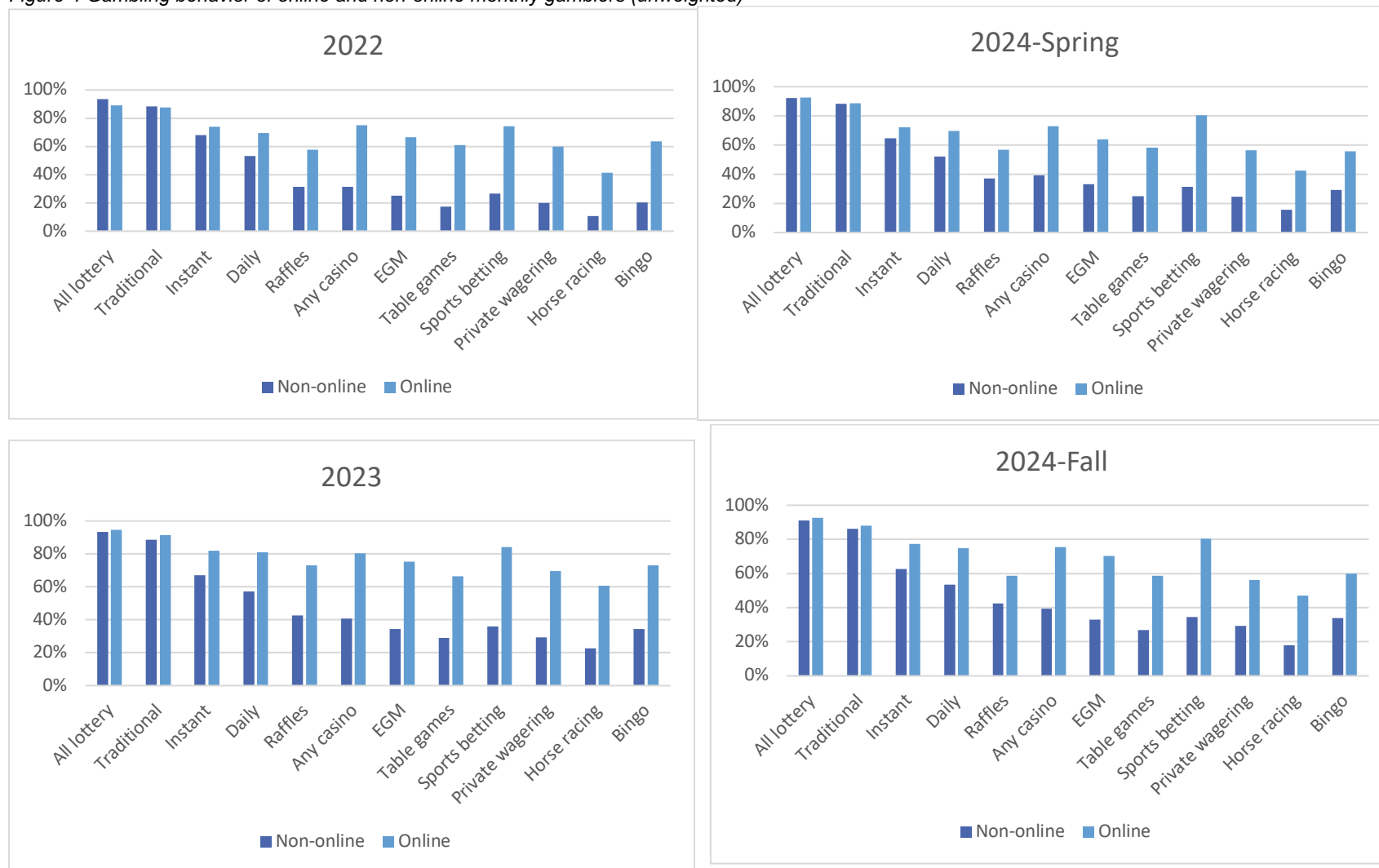
In terms of lottery, monthly online gamblers and monthly non-online gamblers in all four panels were about equally likely to have purchased lottery tickets in the past year. Monthly online gamblers were more likely than monthly non-online gamblers to have purchased instant scratch tickets in the past year and more likely to have played the daily monitor lottery game (Keno or Wheel of Luck) in all four panels.

Past-year participation rates for every other type of gambling were much higher among monthly online gamblers compared with monthly non-online gamblers. The greatest differences between the two groups were for horserace betting: in 2022, 41% of monthly online gamblers had bet on horseraces in the past year compared to 11% of monthly non-online gamblers. Differences in past-year participation in horserace betting were smaller in 2023 and 2024 compared to 2022.

Monthly online gamblers in 2022 were much more likely than monthly non-online gamblers to have gambled on horseraces, casino table games, bingo, private wagers, sports betting and electronic gambling machines (EGMs). In 2023, monthly online gamblers were more than twice as likely as monthly non-online gamblers to have gambled on horseraces, private wagers, sports betting, and casino table games. They were twice as likely as monthly non-online gamblers to have gambled on EGMs, and bingo.

In both of the 2024 panels, monthly online gamblers were more than twice as likely as monthly non-online gamblers to have gambled on horseraces, sports betting and casino table games. In Spring 2024, online gamblers were twice as likely as non-online gamblers to have engaged in private wagering. In Fall 2024, online gamblers were twice as likely as non-online gamblers to have gambled on EGMs in the past year.

Figure 4 Gambling behavior of online and non-online monthly gamblers (unweighted)



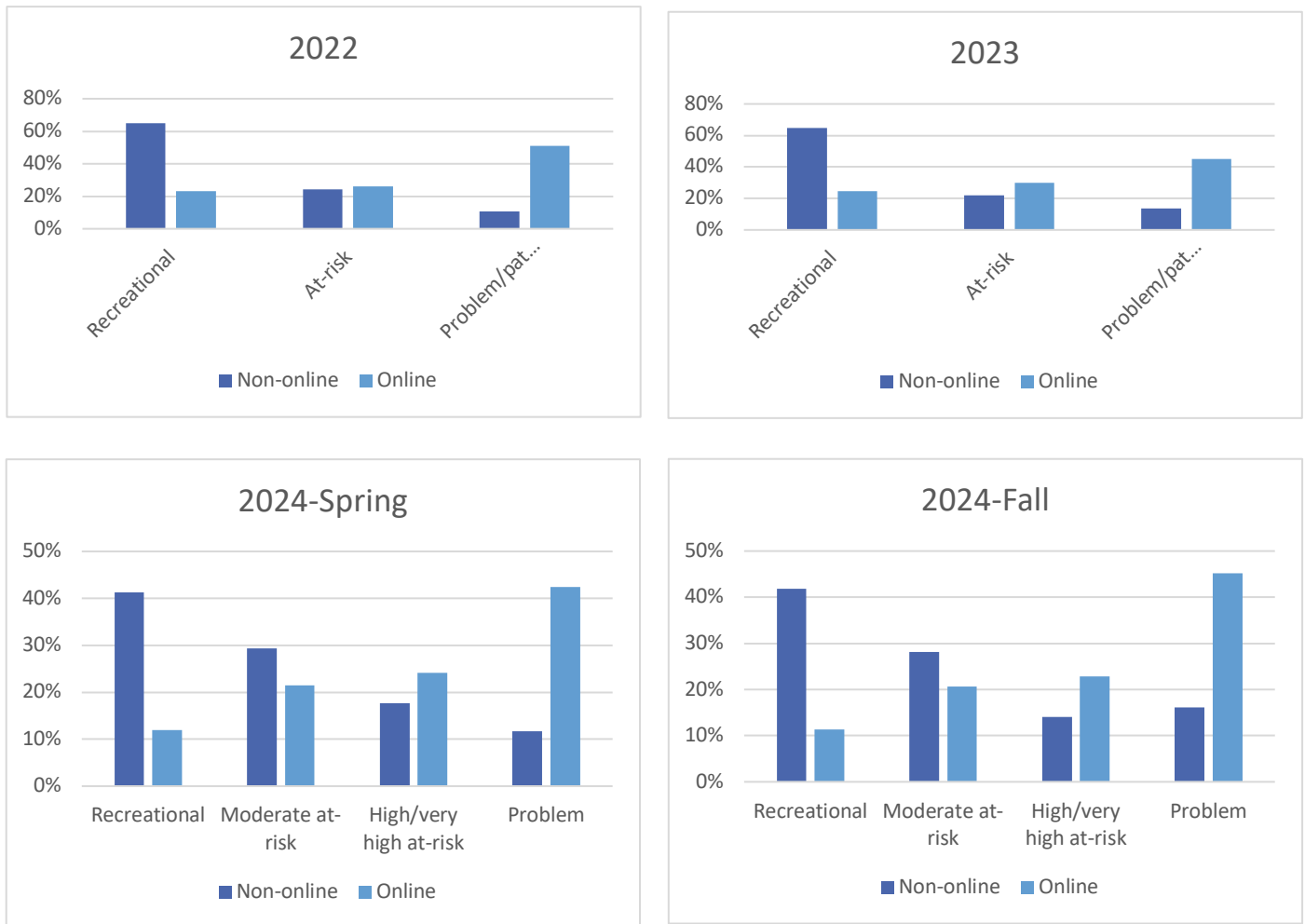
Gambling Problems

Problem gambling was assessed using the PPGM in the 2022 and 2023 online panel surveys. In the two 2024 online panel surveys in Massachusetts, the PGM was used to assess gambling problems. It is important to emphasize that the Recreational Gambling and Problem Gambling rates are comparable across all four online panels. It is only the At-Risk rates that cannot be compared over the entire series.

Figure 4 below presents information about the proportion of monthly online gamblers and monthly non-online gamblers classified according to the PPGM (2022 and 2023) or the PGM (Spring 2024 and Fall 2024). As with gambling behavior, differences between the two groups of gamblers were not adjusted to control for the likely greater gambling involvement of the online gamblers.

Across all four surveys, the proportion of panelists classified as Recreational Gamblers was substantially lower among monthly online gamblers compared with monthly non-online gamblers. A corresponding observation is that the proportion of panelists classified as Problem Gamblers across all four surveys was much higher among monthly online gamblers compared with monthly non-online gamblers. In 2022 and 2023, monthly online gamblers were between three and four times more likely than monthly non-online gamblers to have been classified as Problem Gamblers. In the 2024 surveys, monthly online gamblers were between two and three times more likely than monthly non-online gamblers to have been classified as Problem Gamblers.

Figure 5 Gambling problems among online and non-online monthly gamblers (unweighted)



Differences between monthly online gamblers and monthly non-online gamblers in the proportion classified as At-Risk were much smaller. Looking at the PPGM results, only the 2023 results show a statistically significant difference in the At-Risk proportions of monthly online and non-online gamblers. In both of the 2024 surveys based on the PGM, monthly online gamblers were less likely than monthly non-online gamblers to have been classified as Moderate At-Risk Gamblers although only the Fall 2024 results differ significantly. Monthly online gamblers were significantly more likely than monthly non-online gamblers to have been classified as High or Very High At-Risk Gamblers (recall that approximately 40% of the members of this group are likely to transition toward Problem Gambling in the next year).

Gambling Harms

Until quite recently, gambling harms have largely been identified with the clinical entity of problem gambling. In the past decade, however, a broader view of the impacts of gambling has emerged internationally with a shift in focus from problem gambling to ‘gambling-related harm’ (Abbott et al., 2018; Browne et al., 2017; Langham et al., 2016; Shannon et al., 2017). This

approach recognizes that there are many more people harmed by gambling than reflected in the rates of problem gambling alone.

Two comprehensive definitions of gambling harm have been proposed in recent years (Abbott et al., 2018; Langham et al., 2016). Both represent an important evolution in the conceptualization of gambling harm consistent with population health frameworks. Both definitions distinguish between gambling behavior and gambling-related harm, thereby separating harmful gambling from problem gambling status. Both definitions also expand the focus beyond harms experienced by the individual gambler to include harms experienced by family members and communities. In contrast to the international definition (Abbott et al., 2018), the Australian definition (Langham et al., 2016) explicitly includes harms that occur over time, reflecting an important expansion in addressing gambling harm from a public health perspective.

The Australian research team developed a taxonomy of gambling harm based on data obtained from focus groups, interviews and posts to problem gambling support forums as well as an online panel survey. This taxonomy distinguished gambling harms at three levels, including the person who gambles, affected others, and the broader community (Browne et al., 2016; Langham et al., 2016). The dimensions of harm identified in this taxonomy include:

- Financial harm
- Relationship disruption, conflict or breakdown
- Emotional or psychological distress
- Decrements to health
- Reduced performance at work or study
- Criminal activity
- Cultural harm

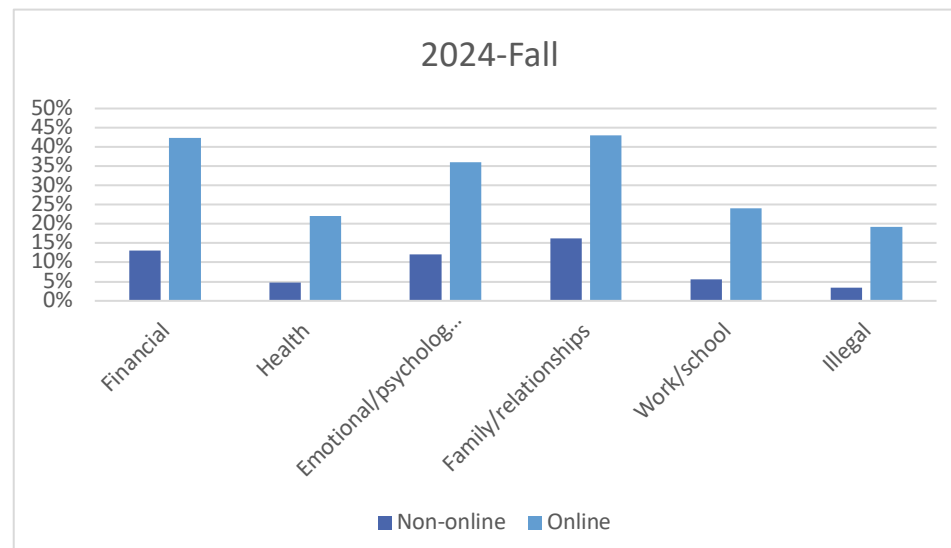
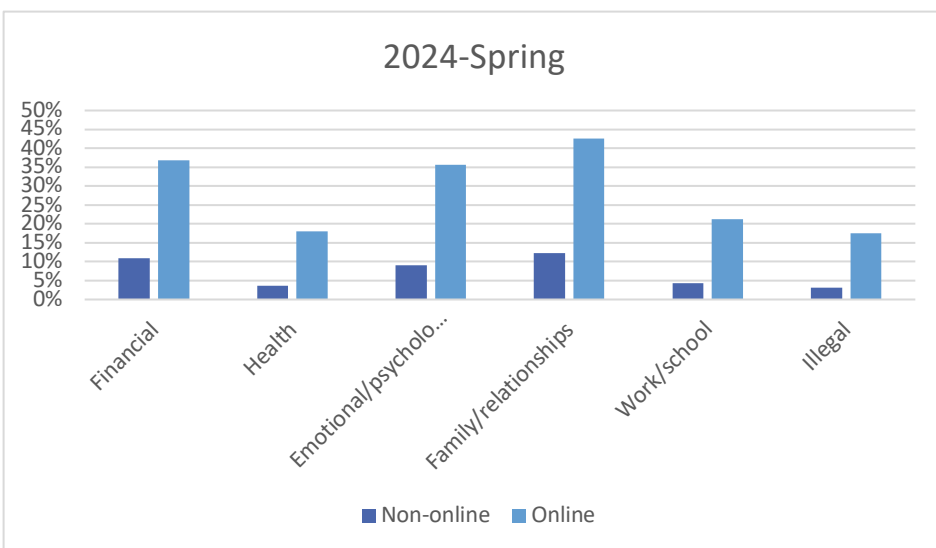
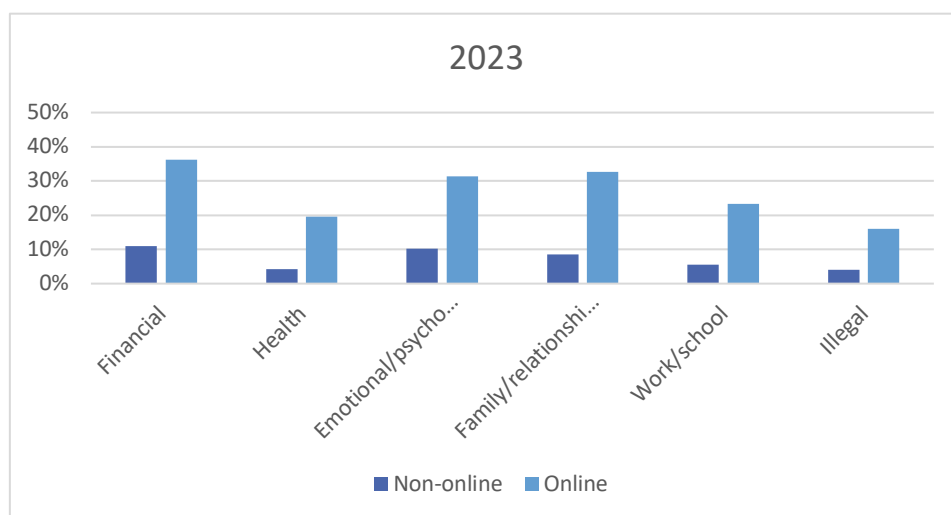
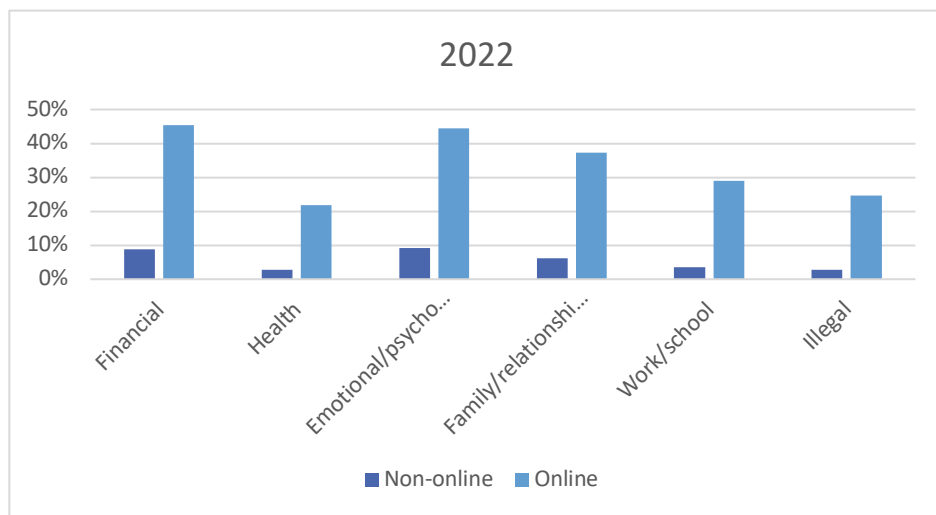
An alternative approach to assessing gambling-related harm—adopted in this report—is to use the items that make up the ‘Problems’ section of the PPGM/PGM. These items comprehensively assess the range of unambiguous harms associated with excessive gambling (i.e., financial, relationship, psychological, physical health, work/school, illegal activity) and only ask about clear and ‘significant’ harm in each of these categories. Further, the PPGM/PGM asks about problems/harms caused to the person or someone close to them.

Figure 5 presents information about gambling harms experienced by monthly online gamblers compared to monthly non-online gamblers. As a reminder, differences between the two groups of gamblers are not adjusted to control for the likely greater gambling involvement of the online gamblers. Figure 5 clearly shows that monthly online gamblers were far more likely to have experienced gambling harms compared to monthly non-online gamblers. This is not surprising given the greater involvement in gambling of online gamblers compared to non-online gamblers.

The largest difference between the groups was for illegal acts in the 2022 survey with 2.8% of monthly non-online gamblers endorsing this item compared to 24.6% of monthly online gamblers. The next largest difference was for work/school harms in the 2022 survey with 3.6% of monthly non-online gamblers and 29% of monthly online gamblers endorsing this type of harm.

Overall, differences between monthly online gamblers and monthly non-online gamblers in experiencing gambling harms were greatest in the 2022 survey and lowest in the Fall 2024 survey. Differences in the 2022 survey ranged from almost five times higher (emotional/psychological harms) to almost nine times higher (illegal acts). In 2023, differences between the groups ranged from three times higher (emotional/psychological harms) to almost five times higher (health-related harms). In Spring 2024, differences ranged from three and a half times higher (family/relationship harms) to almost six times higher (illegal acts). In Fall 2024, differences ranged from two and a half times higher (family/relationship harms) to five and a half times higher (illegal acts).

Figure 6 Gambling harms among online and non-online monthly gamblers (unweighted)



Awareness of Prevention Efforts

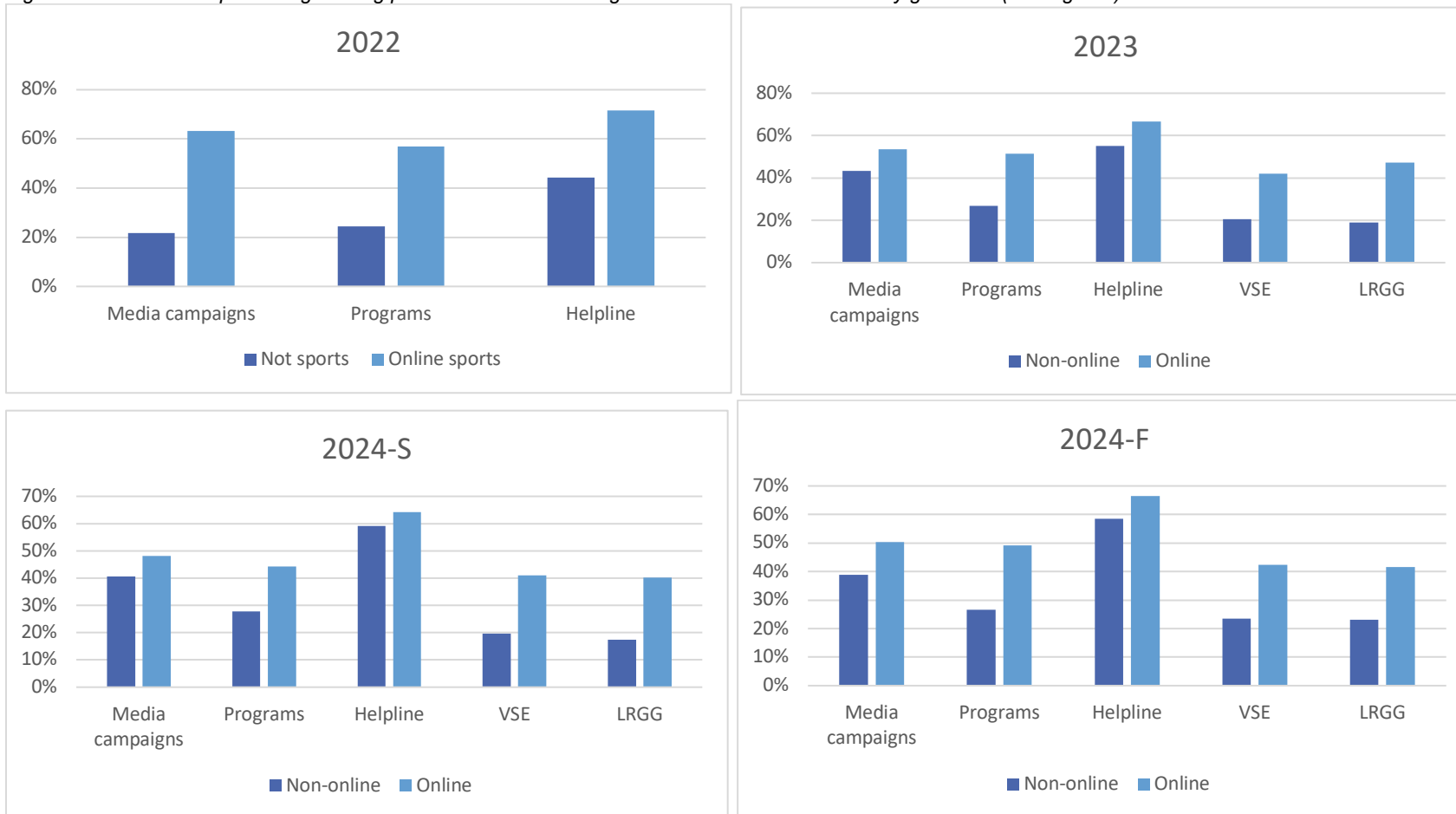
It is helpful to understand awareness of problem gambling prevention efforts among gamblers to assist these individuals in making healthier choices about their gambling and to reduce misconceptions about gambling. Awareness of problem gambling prevention efforts also allows gamblers to recognize early warning signs of harm and, potentially, leads them to seek help before the impacts become severe.

There were questions in all the online panel surveys related to awareness of efforts to prevent gambling problems in Massachusetts. In 2022, online panelists who had gambled in the past 12 months were asked whether they had seen or heard any media campaigns to prevent problem gambling in Massachusetts, whether they had been aware of any programs offered at school, work or in the community to prevent problem gambling, and whether they were aware of the Massachusetts problem gambling helpline. Panelists in the other three surveys who had gambled in the past 12 months were additionally asked whether they were aware of the Massachusetts voluntary casino self-exclusion program and whether they were familiar with the Lower Risk Gambling Guidelines (Hodgins et al., 2022; M. Young et al., 2021; M. M. Young et al., 2024).

Figure 6 presents information about awareness of problem gambling prevention measures in Massachusetts among monthly online gamblers compared to monthly non-online gamblers. Monthly online gamblers were significantly more likely than monthly non-online gamblers to indicate that they were aware of media campaigns to prevent problem gambling in Massachusetts and programs offered at school, work or in the community to prevent problem gambling.

With the exception of the Spring 2024 survey, monthly online gamblers were significantly more likely than monthly non-online gamblers to indicate that they were aware of the Massachusetts problem gambling helpline. Monthly online gamblers in 2023 and the two 2024 surveys were significantly more likely than monthly non-online gamblers to indicate that they were aware of the Massachusetts voluntary casino self-exclusion program and the Lower Risk Gambling Guidelines.

Figure 7 Awareness of problem gambling prevention efforts among online and non-online monthly gamblers (unweighted)



Comparing Online Sports Bettors & Online Non-Sports Gamblers

This section focuses more narrowly on changes over time among monthly online gamblers who gambled on sports compared with those who gambled online but not on sports – including demographics, gambling behavior, gambling problems, gambling harms and awareness of prevention efforts among monthly online panelists who did and did not gamble on sports online. It is important to note that the only legal form of online gambling in Massachusetts at the time of this research was sports wagering.⁹ It is possible that some of the online gambling done by non-sports gamblers was illegal since panelists were asked to include playing poker, buying lottery tickets, and betting on sports, bingo, slots or casino gable games for money or playing interactive games for money (e.g., esports, fantasy sports) as ‘online gambling.’

Demographic Characteristics

Gender differences among monthly online sports bettors and monthly online gamblers who had not bet on sports were substantial with online sports bettors significantly more likely to be male and, with the exception of 2022, online gamblers who had not bet on sports significantly more likely to be female.

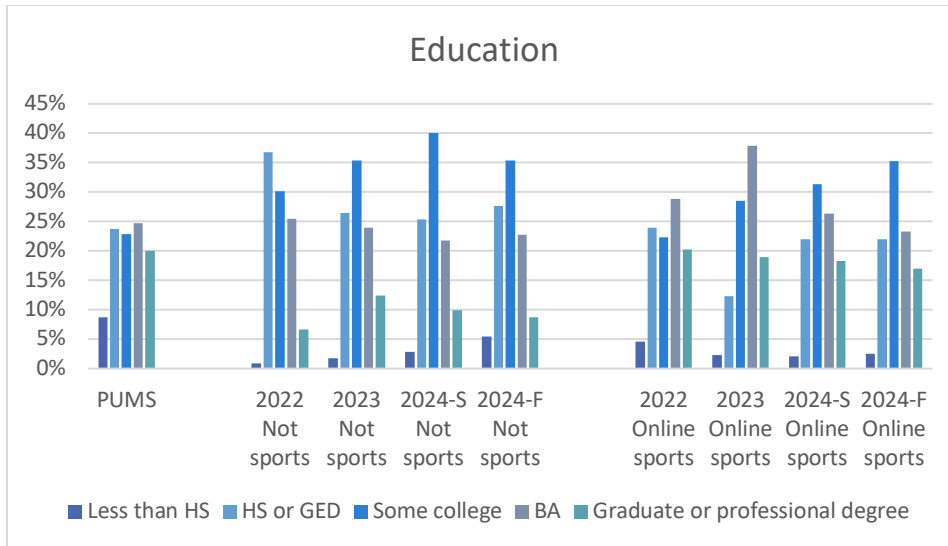
With respect to **age**, monthly online sports bettors were more likely to be aged 25 to 34 compared with online gamblers who had not bet on sports and less likely to be aged 55 and older. Looking at ethnicity, monthly online sports bettors were significantly more likely than online gamblers who had not bet on sports to be Hispanic across all four panels. Monthly online sports bettors in the two 2024 panels were more likely to be Black compared to monthly online sports bettors in 2022 and 2023.

Regarding **annual household income**, monthly online sports bettors were significantly less likely than online gamblers who had not bet on sports to have annual household incomes under \$50,000 and more likely to have incomes of \$100,000 or more. Finally, with respect to education, monthly online sports bettors were less likely than online gamblers who had not bet on sports to have graduated from high school or obtained a GED and more likely to have a graduate or professional degree.

⁹ Daily fantasy sports betting (DFS) has been legal in the Commonwealth since 2016 and is regulated by the Office of the Attorney General.

Figure 8 Demographic characteristics of online sports and online non-sports monthly gamblers (unweighted)





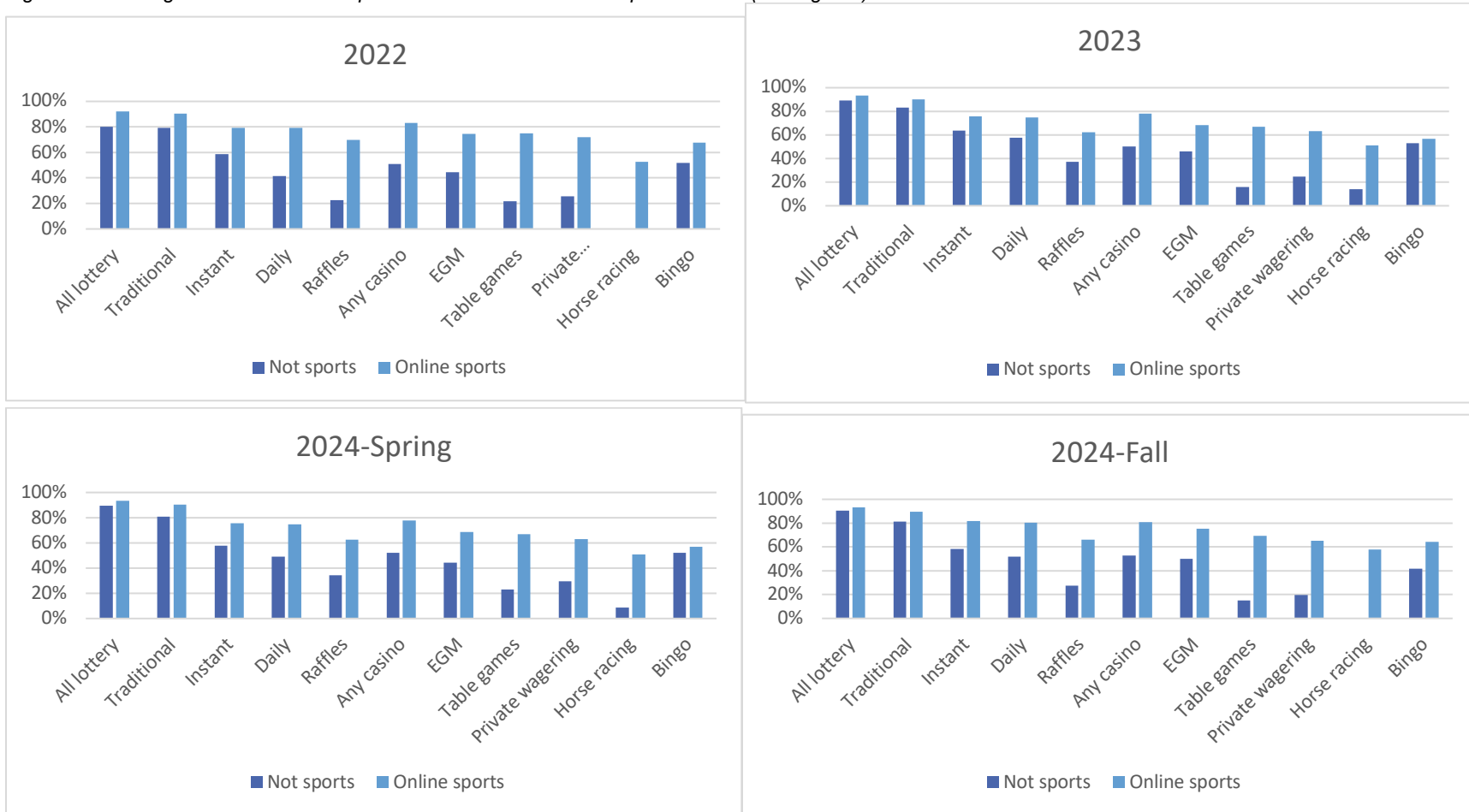
Gambling Behavior

Monthly online sports bettors were more likely than monthly online gamblers who had not bet on sports to have purchased lottery tickets in the past year in 2022 but not in the other three panel surveys. Monthly online sports bettors were between 7 percentage points and 10 percentage points more likely than monthly gamblers who had not bet on sports to have purchased traditional large-jackpot lottery tickets in the past year, between 20 percentage points and 25 percentage points more likely to have played purchased instant scratch tickets, and between 20 percentage points and 30 percentage points more likely to have played the lottery’s daily monitor game.

Past-year participation rates for every other type of gambling were much higher among monthly online sports bettors compared with monthly online gamblers who had not bet on sports. The greatest differences between the two groups were for horserace betting, private wagering and casino table games. In 2022, 53% of monthly online sports bettors and no monthly online gamblers who had not bet on sports had bet on horseraces in the past year. Similarly, in Fall 2024, 58% of monthly online sports bettors and no monthly online gamblers who had not bet on sports had bet on horseraces in the past year. Differences in past-year participation in horserace betting were smaller in 2023 and Spring 2024 but nevertheless significant.

Monthly online sports bettors were between two and three times more likely than monthly online gamblers who had not bet on sports to have wagered privately in the past year and between two times and almost four times more likely than monthly online gamblers who had not bet on sports to have played casino tables games in the past year.

Figure 9 Gambling behavior of online sports bettors and online non-sports bettors (unweighted)



Gambling Problems & Harms

Figure 9 presents information about the proportion of online sports bettors and online non-sports gamblers classified according to the PPGM (2022 and 2023) or the PGM (2024-Spring and 2024-Fall). As with online gamblers more generally, the proportion of monthly online sports bettors classified as Recreational Gamblers was significantly lower compared with monthly online gamblers who had not bet on sports. A corresponding observation is that the proportion of monthly online sports bettors classified as Problem Gamblers in all four surveys was significantly higher compared with monthly online gamblers who had not bet on sports. In 2022 and 2023, monthly online sports bettors were between two and two and a half times more likely than monthly online gamblers who had not bet on sports to have been classified as Problem Gamblers. In the 2024 surveys, monthly online sports bettors were between two times and three and a half times more likely than monthly online gamblers who had not bet on sports to have been classified as Problem Gamblers.

Figure 10 presents information about gambling harms experienced by monthly online sports bettors compared to monthly online gamblers who had not bet on sports. Figure 10 clearly shows that monthly online sports bettors were far more likely to have experienced gambling harms compared to monthly online gamblers who had not bet on sports. This is most clearly the case for family/relationship harms (with the exception of Spring 2024), financial harms and emotional/psychological harms. It is also notable that the number of monthly online gamblers who had not bet on sports was too small to report for several harms including health and illegal acts and, in 2023 and Fall 2024, work/school harms.

Figure 10 Gambling problems among online sports bettors and online non-sports bettors (unweighted)

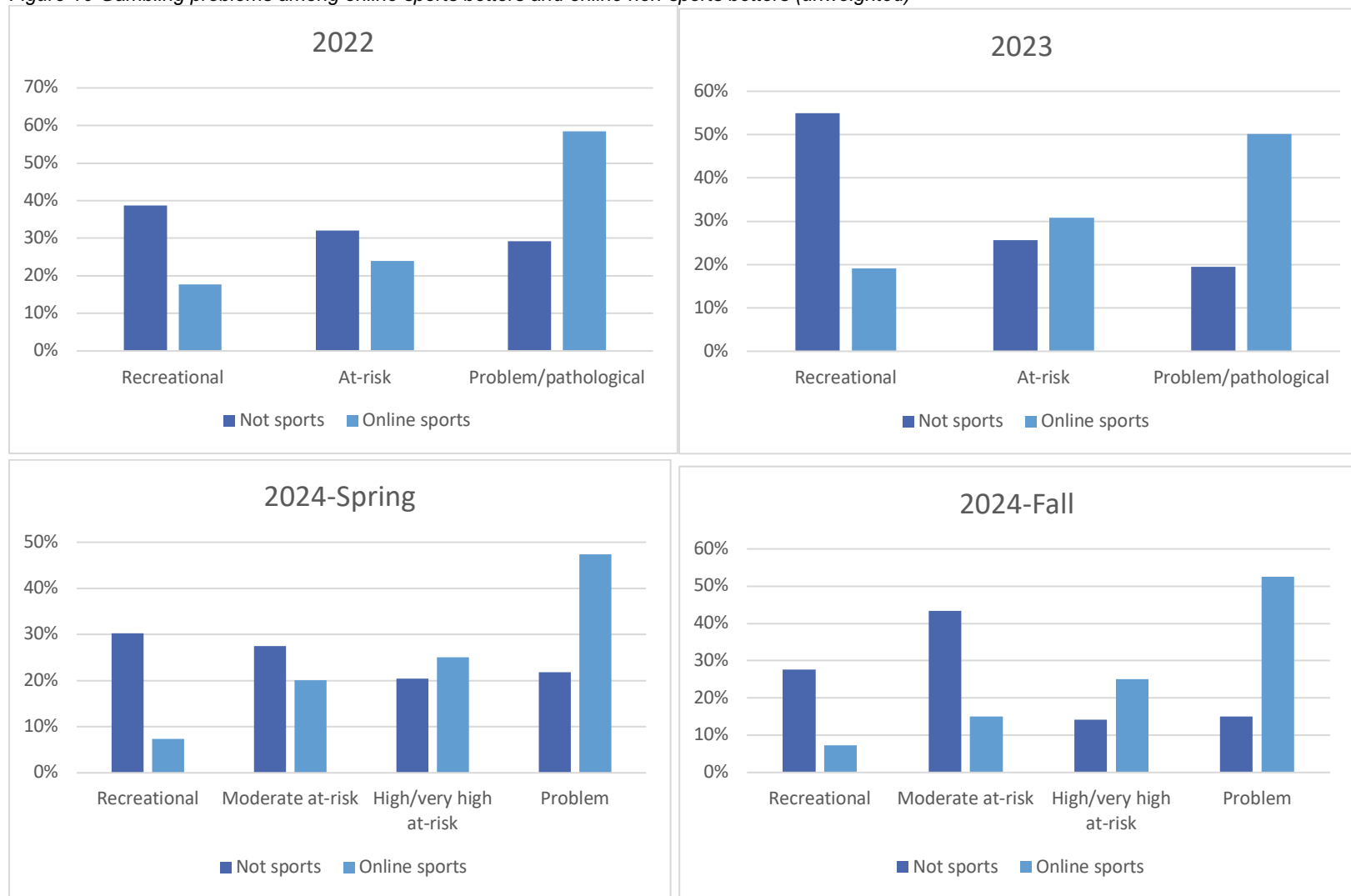
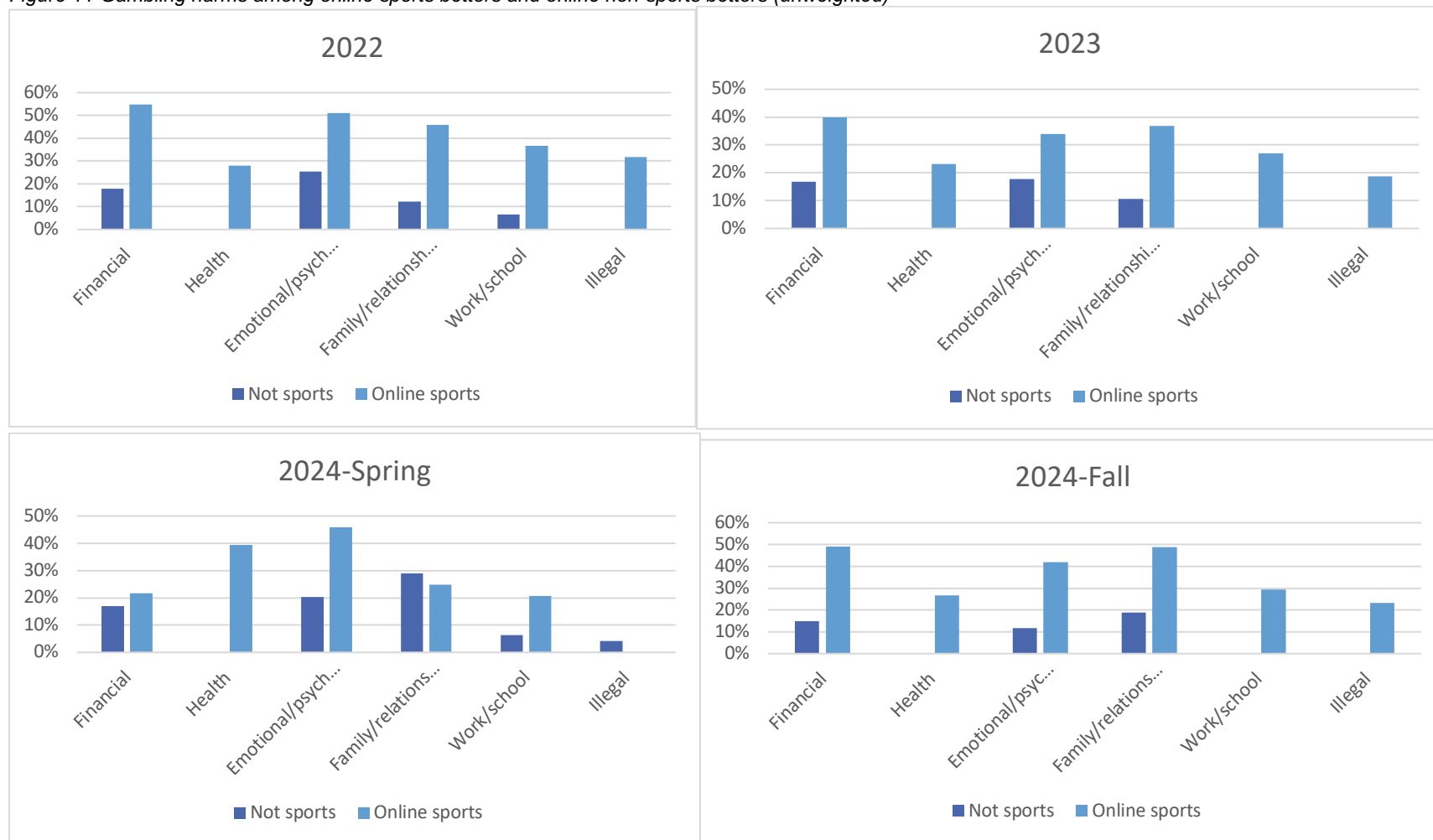


Figure 11 Gambling harms among online sports bettors and online non-sports bettors (unweighted)

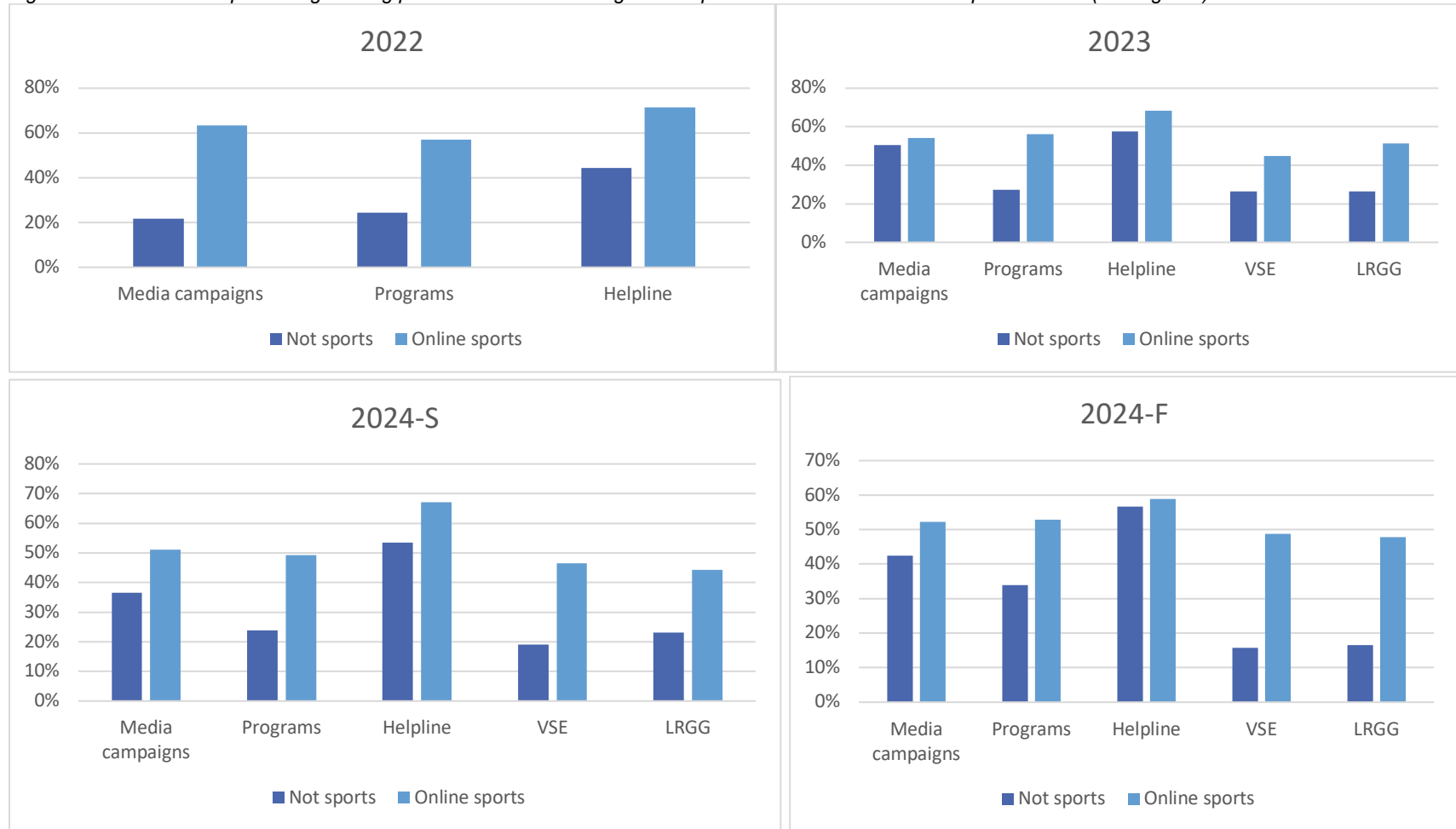


Awareness of Prevention Efforts

As already noted, there were questions in all the online panel surveys related to awareness of efforts to prevent gambling problems in Massachusetts. Online panelists in 2022 were asked about their awareness of media campaigns to prevent problem gambling, non-media campaigns to prevent problem gambling and the Massachusetts problem gambling helpline. Panelists in the other three surveys were also asked whether they were aware of the Massachusetts voluntary casino self-exclusion program and whether they were familiar with the Lower Risk Gambling Guidelines (Hodgins et al., 2022; M. Young et al., 2021; M. M. Young et al., 2024).

Figure 11 presents information about awareness of problem gambling prevention measures in Massachusetts among monthly online sports bettors compared to monthly online gamblers who had not bet on sports. In 2022, monthly online sports bettors were significantly more likely than monthly online gamblers who had not bet on sports to indicate that they were aware of all three problem gambling prevention efforts in Massachusetts. In 2023, monthly online sports bettors were significantly more likely than monthly online gamblers who had not bet on sports to indicate that they were aware of non-media campaigns, the voluntary self-exclusion program and the Lower Risk Gambling Guidelines. Monthly online sports bettors in the Spring 2024 survey were significantly more likely than monthly online gamblers who had not bet on sports to indicate that they were aware of all of the five problem gambling prevention efforts included in the survey. Finally, monthly online sports bettors in the Fall 2024 survey were significantly more likely than monthly online gamblers who had not bet on sports to indicate that they were aware of non-media problem gambling prevention efforts, the voluntary self-exclusion program and the Lower Risk Gambling Guidelines.

Figure 12 Awareness of problem gambling prevention efforts among online sports bettors and online non-sports bettors (unweighted)



Emerging Adult Gamblers

This section of the report focuses on the impacts of iGaming on monthly gamblers in Massachusetts under the age of 25. This includes the demographic characteristics of monthly gamblers under the age of 25 in the online panel surveys followed by their gambling behavior, rates of gambling problems and harms, and awareness of problem gambling prevention efforts in Massachusetts.

Demographic Characteristics

Figure 12 presents differences in demographic characteristics of monthly gamblers in the four online panels under the age of 25. Comparable data on the entire adult Massachusetts population is included in each graph for comparison purposes. It is helpful to note that 12.1% of the adult Massachusetts population was aged 18 to 24 in 2023. The proportion of monthly gamblers in this age group among monthly gamblers in the online panels was 10.7% in 2022, 11.1% in 2023, 13.1% in Spring 2024 and 13.2% in Fall 2024.

Figure 12 shows the majority of monthly gamblers aged 18 to 24 were male in 2022. In 2023 and Spring 2024, the proportion of male and female monthly gamblers aged 18 to 24 was about equal. In Fall 2024, the majority of monthly gamblers aged 18 to 24 were female. This change is a concern since, nationally and internationally, women are far less likely to gamble compared to men. However, sportsbook operators have targeted young women in their extensive advertising campaigns since 2019 and the change may reflect the effectiveness of those efforts. The change may also reflect growing acceptance of gambling, particularly online, among young women.

With respect to ethnicity, Figure 12 shows that monthly gamblers aged 18 to 24 were increasingly likely to be non-White. While the proportions of Hispanic and Asian monthly gamblers aged 18 to 24 remained fairly steady across the four surveys, the proportion of Black monthly gamblers aged 18 to 24 increased from 8.2% in 2023 to 17.2% in Spring 2024 and remained higher at 15.9% in Fall 2024.

Likely due to their age, the proportion of monthly gamblers aged 18 to 24 in Massachusetts that had graduated from high school or attended college was much higher than the entire adult Massachusetts population; these gamblers were much less likely than the adult Massachusetts population to have obtained a graduate or professional degree. For the same reason, the proportion of monthly gamblers aged 18 to 24 with annual household incomes under \$50,000 was much higher compared to the adult Massachusetts population as a whole.

Figure 13 Demographic characteristics of monthly gamblers under 25 years old (unweighted)



Gambling Behavior

Figure 13 presents information about the past-year gambling behavior of monthly gamblers aged 18 to 24 in the four panels. Across all four panels, monthly gamblers aged 18 to 24 were less likely than monthly gamblers as a whole to have purchased any lottery products, including traditional large-jackpot tickets, instant scratch tickets and the daily monitor game. Monthly gamblers aged 18 to 24 were more likely than monthly gamblers as a whole to have participated in every other type of gambling included in the survey. This included raffles, EGMs, casino table games, sports betting, private wagering, horserace betting and bingo. Across all four surveys, these differences were greatest for private wagering, horserace betting and bingo.

Gambling Problems & Harms

Figure 14 presents information about the proportion of monthly gamblers aged 18 to 24 classified according to the PPGM (2022 and 2023) or the PGM (Spring 2024 and Fall 2024) compared to all monthly gamblers across the four panel surveys. The proportion of monthly gamblers aged 18 to 24 classified as Recreational Gamblers was significantly lower compared with all monthly gamblers. The corresponding observation is that the proportion of monthly gamblers aged 18 to 24 classified as Problem Gamblers in all four surveys was significantly higher compared with all monthly gamblers. In 2022, monthly gamblers aged 18 to 24 were two times more likely than all monthly gamblers to have been classified as Problem Gamblers. In the 2023 and 2024 surveys, gamblers aged 18 to 24 were between one and two times more likely than all monthly gamblers to have been classified as Problem Gamblers.

Figure 15 presents information about gambling harms experienced by monthly gamblers aged 18 to 24 compared to all monthly gamblers in the four surveys. Figure 15 shows that monthly gamblers aged 18 to 24 were more likely to have experienced gambling harms compared to all monthly gamblers. This is most clearly the case for work/school harms: monthly gamblers aged 18 to 24 were between two and two and a half times more likely to have experienced work/school harms compared to all monthly gamblers. The exception is in 2023 where monthly gamblers aged 18 to 24 were one and a half times more likely to have experienced work/school harms compared to all monthly gamblers. Rates of financial harm were between one and a half and two times higher among monthly gamblers aged 18 to 24 compared with all monthly gamblers. Harms related to health were between one and a half and two times higher among monthly gamblers aged 18 to 24 compared with all monthly gamblers. Emotional/psychological harms were between one and a half and one and three quarters higher, family/relationship harms were between one and a half and two times higher, and harms related to illegal acts were between one and two times higher among monthly gamblers aged 18 to 24 compared with all monthly gamblers.

Figure 14 Gambling behavior of monthly gamblers aged 18 to 24 (unweighted)



Figure 15 Gambling problems among monthly gamblers aged 18 to 24 (unweighted)

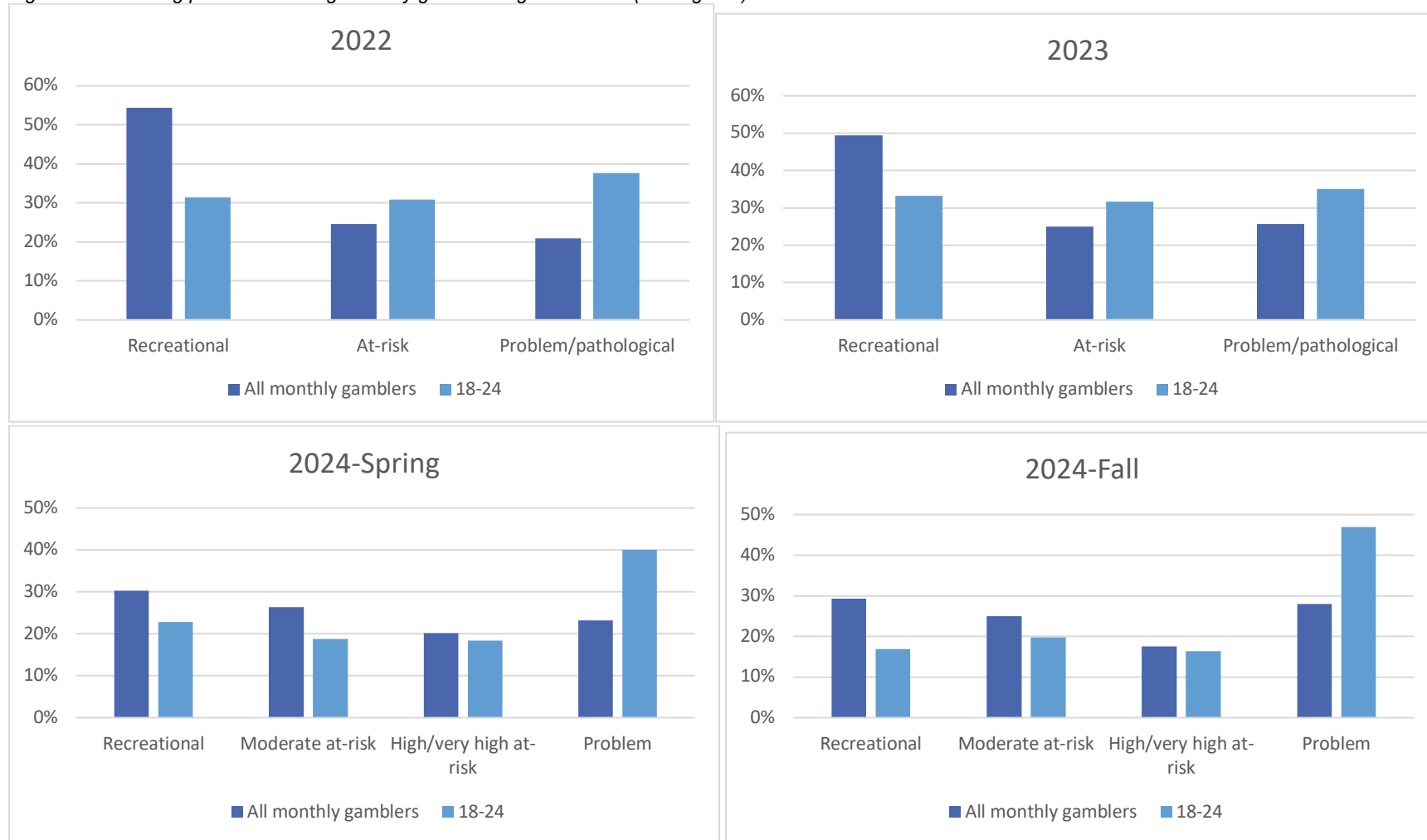
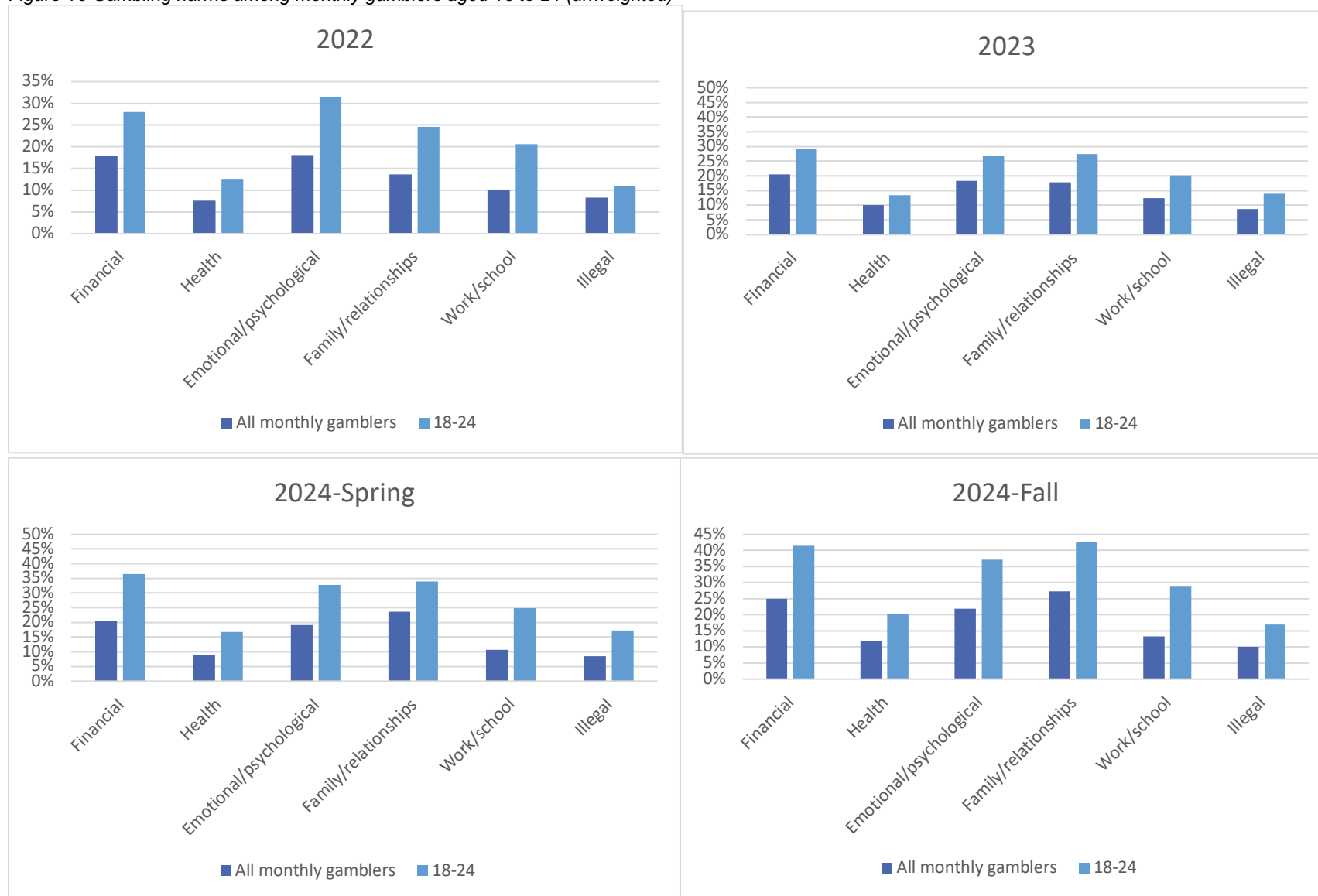


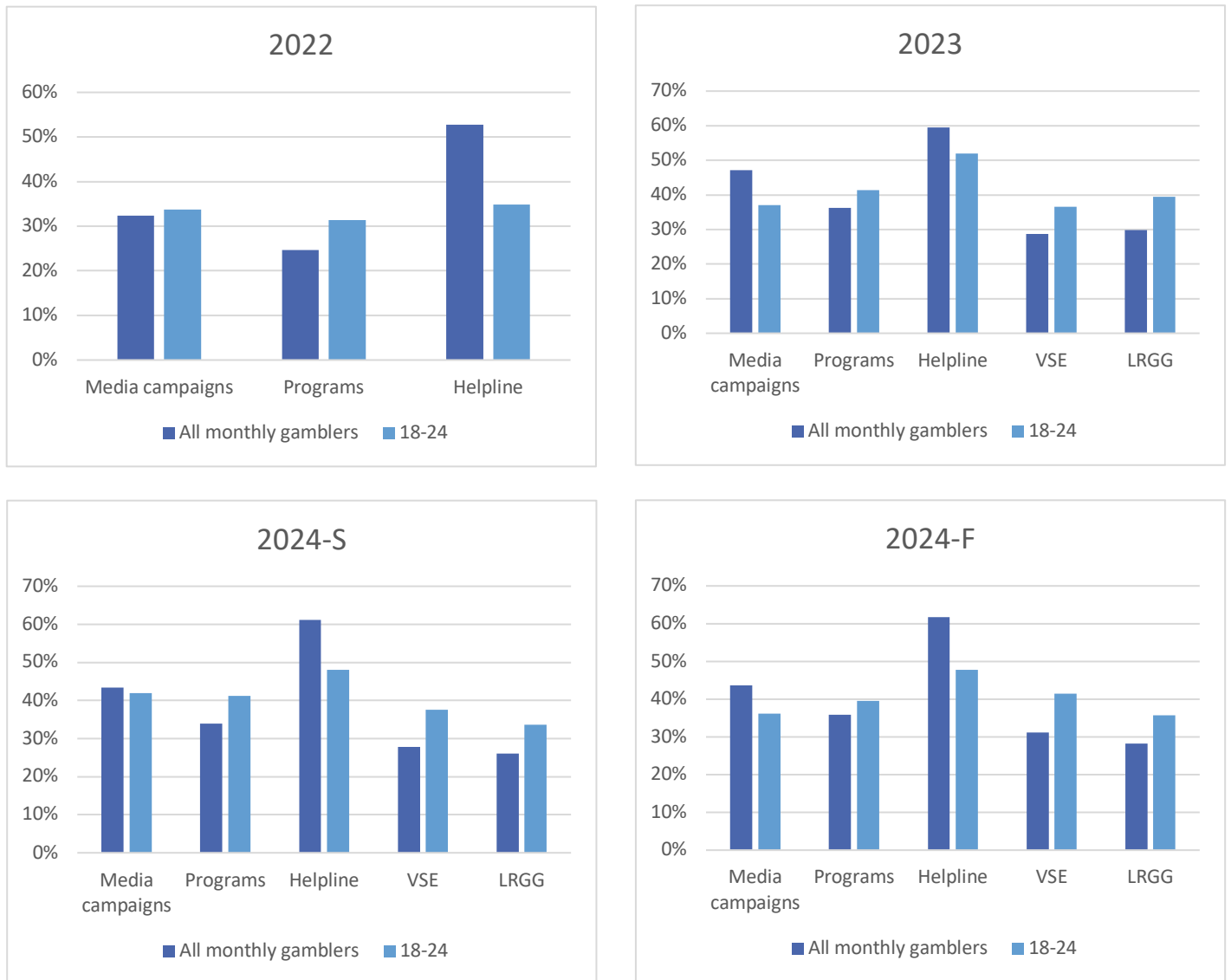
Figure 16 Gambling harms among monthly gamblers aged 18 to 24 (unweighted)



Awareness of Prevention Efforts

Finally, we present responses to questions in the online panel surveys related to awareness of efforts to prevent gambling problems in Massachusetts. Figure 16 presents information about awareness of problem gambling prevention measures in Massachusetts among monthly gamblers aged 18 to 24 compared to all monthly gamblers. In all four surveys, monthly gamblers aged 18 to 24 were less likely than all monthly gamblers to indicate that they were aware of the state’s problem gambling helpline. In the 2023 and 2024 surveys, monthly gamblers aged 18 to 24 were more likely than all monthly gamblers to indicate that they were aware of the state’s voluntary self-exclusion program and the Lower Risk Gambling Guidelines.

Figure 17 Awareness of problem gambling prevention efforts among monthly gamblers aged 18 to 24 (unweighted)



Summary: The Massachusetts Context

Results from four online panel surveys in Massachusetts have utility in answering several of the research questions posed in this study.

Monthly online vs. non-online gamblers

First, comparing the characteristics of monthly gamblers in the online panels who participate in iGaming compared with those who gamble but not online, we found that monthly online gamblers were more likely than monthly non-online gamblers to be male, aged 25 to 54, Hispanic, have annual household incomes of \$100,000 to \$150,000 and to have a graduate or professional degree.

Monthly online gamblers were more likely than monthly non-online gamblers to have purchased instant scratch tickets and played the lottery's daily monitor game. Past-year participation rates for all other types of gambling were higher among monthly online gamblers compared to monthly non-online gamblers with the greatest differences for EGMs, casino table games, sports betting and horserace betting.

Monthly online gamblers were more likely than monthly non-online gamblers to have experienced gambling problems and, in the two 2024 surveys where the PGM was deployed, to be classified as High or Very High At-Risk Gamblers. Across all of the surveys, monthly online gamblers were more likely to have experienced all types of gambling harm compared to monthly non-online gamblers. Finally, monthly online gamblers were more likely than monthly non-online gamblers to be aware of problem gambling prevention efforts in Massachusetts, particularly the problem gambling helpline, the state's voluntary exclusion program and the Lower Risk Gambling Guidelines.

Online sports bettors vs. online non-sports gamblers

Second, comparing the characteristics of monthly gamblers in the online panels who gamble on sports online compared with those who gamble online but not on sports, we found that monthly online sports bettors were more likely than monthly online gamblers who had not bet on sports to be male, aged 25 to 34, Hispanic and, in the 2024 surveys, to be Black, to have annual household incomes over \$100,000 and to have a graduate or professional degree.

Monthly online sports bettors were more likely than online gamblers who had not bet on sports to have purchased lottery tickets in 2022 and more likely across all four surveys to have played the lottery's daily monitor game. Overall, monthly online sports bettors were more likely than online gamblers who had not bet on sports to have participated in all of the other types of gambling included in the survey with the differences greatest for horserace betting, private wagering and casino table games.

With respect to gambling problems, monthly online sports bettors were more likely than monthly online gamblers who had not bet on sports to have experienced gambling problems and gambling harms with the greatest differences for family/relationship harms, financial harms and

emotional/psychological harms. Lastly, monthly online sports bettors were more likely than monthly online gamblers who had not bet on sports to be aware of problem gambling prevention efforts in Massachusetts although recognition varied from survey to survey.

Emerging adult gamblers

Thirdly, comparing monthly gamblers aged 18 to 24 in the online panels with the Massachusetts adult population, we found that these younger gamblers were more likely to be male in the 2022 survey but more likely to be female in the Fall 2024 survey. Across the four surveys, monthly gamblers aged 18 to 24 were increasingly more likely to be non-White with increases greatest among Black young adults. Monthly gamblers aged 18 to 24 were more likely than the Massachusetts adult population to have graduated high school but less likely to have obtained advanced degrees and more likely to have annual household incomes under \$50,000.

With respect to past-year gambling participation, monthly gamblers aged 18 to 24 were less likely than all monthly gamblers to have purchased lottery products and more likely to have participated in every other type of gambling included in the survey. Differences were greatest for private wagering, horserace betting and bingo. Monthly gamblers aged 18 to 24 were more likely than all monthly gamblers to have experienced gambling problems as well as gambling harms, particularly work/school harm. Finally, monthly gamblers aged 18 to 24 were less likely than all monthly gamblers to be aware of the state's problem gambling helpline but more likely to be aware of the state's voluntary self-exclusion program and the Lower Risk Gambling Guidelines.

Discussion & Policy Recommendations

Discussion & Policy Recommendations

This study was designed to answer eight research questions; six regarding **potential public health impacts** of legalizing iGaming in Massachusetts, and two additional questions to identify the most important **considerations for policy, regulation, and research** to minimize risk of harm in the event iGaming is legalized in the Commonwealth. The report as a whole answers these questions comprehensively; in this section we summarize each answer and highlight key findings from the five study inputs.

iGaming versus online gambling

This study seeks to understand the impacts of iGaming (online casino gambling) as a distinct activity. However, research to date has typically examined online gambling as a *mode of access*, without distinguishing between *types of activities*. As certain online gambling activities are already legal in the Commonwealth of Massachusetts, findings related to online gambling broadly are of lesser relevance. Rather, to the extent possible, this report prioritizes findings that relate to iGaming individually.

Potential Public Health Impacts

1. What are the characteristics of those who participate in iGaming compared with those who participate in other forms of gaming?

Evidence on participation in iGaming specifically is limited. As a mode of access more broadly, evidence and data indicate that those who gamble online tend to be highly involved, i.e., participate in multiple forms of gambling. A mix of variables is associated with online gambling participation, including sociodemographic (younger age, being male, lower income, Hispanic, Black), personality (impulsivity), and environmental factors (access to legal gambling). Over time, young adults continue to show the highest increases in online gambling participation, but participation is growing for women and for people who do not identify as White.

A recent Canadian study (Shaw & Williams, 2024) compared adults who gamble online with those who exclusively gamble in land-based sites. Those who gamble online showed **significantly greater involvement** – they gamble more frequently, spend more time gambling, engage in more types of gambling, and incur greater gambling losses (Shaw & Williams, 2024). Their involvement in online gambling is robustly and significantly predicted by **being younger and male, with higher impulsivity, and by the environmental factor of having access to legal online gambling**.

New Jersey prevalence research showed four times as many women began gambling online from 2017 to 2023. The 2023 study also found significant over-representations among specific subgroups of the population, including **individuals identifying as Asian, Black/African American, and Hispanic, those making less than \$15,000/year, and students**. The **18-24 age group** had the greatest increases in participation of any age group.

Massachusetts SEIGMA data showed that monthly online gamblers had **much higher past-year participation rates for every type of gambling (except lottery tickets)** compared with monthly non-online gamblers. Monthly online gamblers were more likely to be **male and younger**, and two times more likely to be **Hispanic** than those who gambled regularly in land-based settings. Differences in income were more mixed – while both groups of gamblers had lower household income than the MA population, the land-based gamblers had lower incomes than the online gamblers. Similar differences were found for education, whereby both groups of gamblers had lower education levels, with the lowest levels for land-based gamblers.

2. What is the relationship of participation in iGaming with problem gambling, and are there higher levels of risk related to certain types of gambling activities?

A small number of recent studies suggest iGaming, particularly online slots, may be associated with elevated risk. This may be partly due to the inherent risk of iGaming as a ‘continuous form’ of gambling. Research has consistently demonstrated that continuous forms of gambling such as EGMs and certain casino games, whether online or land-based, are associated with increased risk. Sports wagering has also been associated with increased risk, which may be partly attributable to the high participation rates of younger males, a population with a high-risk profile. More broadly, research indicates that those who gamble in both online and land-based settings consistently show the highest rates of gambling problems and harms (followed by online only, followed by land-based only). This aligns with the well-established finding that breadth of involvement is one of the strongest predictors of risk and harm.

Emerging evidence suggests that online casino gambling, specifically, is associated with increased risk (Marionneau et al., 2024a; Oksanen et al., 2024; Tran et al., 2024). This may be due to its inherent risk as a ‘continuous form’ of gambling (allowing for rapid play with a short time between wagering and the outcome, in which an individual can engage for long periods of time). Evidence has consistently demonstrated that continuous forms of gambling such as EGMs and casino games are associated with increased risk (Allami et al., 2021b; Binde et al., 2017; Gooding & Williams, 2024).

The relationship between risk and online gambling generally (i.e., any activity) has been more thoroughly explored, with recent evidence continuing to indicate that online gambling is associated with higher risk than land-based gambling (Allami et al., 2021b; Gooding & Williams, 2024; Shaw & Williams, 2024; Suomi et al., 2024; Tran et al., 2024).

New Jersey prevalence and player behavior data indicate that the risk for problem gambling is greater for those who gamble online compared to those who only gamble in land-based venues. In addition, the risk is highest for those who gamble in mixed venues (both online and in land-based). This was supported in the Massachusetts SEIGMA data, where monthly online gamblers were far more likely to have experienced gambling harms across all dimensions (financial, relationship, psychological, physical health, work/school, illegal activity) compared to monthly non-online gamblers.

3. What populations are at highest risk of gambling-related harms from iGaming?

While there is a lack of evidence to identify populations experiencing harms from iGaming specifically, there is strong evidence that, in general, harm from gambling disproportionately affects young adults and those who are already socioeconomically disadvantaged. Data from Massachusetts indicate young monthly online gamblers (18-24) are more likely than older monthly online gamblers to experience all harms. Additionally, studies show young people are more likely to experience the most severe harms (suicidality). Those who gamble online (any activity) are also more likely to experience harm than land-based gamblers. As New Jersey data show that women and non-White populations show increases in online gambling participation, these populations should be monitored for increases in problems and harm.

Young adults and adolescents who gamble online are at higher risk of harms. A global review found 18–24-year-olds exhibited the highest prevalence of problem gambling at 15.8%, compared to 8.6-10% for the whole population (Tran et al., 2024). More than 25% of adolescents who play online casino or slots are problematic gamblers, though higher rates of PG are seen among adolescents who engage in in-venue casino gambling and betting on races. Young males are at higher risk than females, with a global review, finding that **adolescent males** engaged in any risk gambling at higher rates (9.3–38.1%) than girls (2.5–25.6%). Another systematic global review of 44 studies found that adolescent boys and **young adult males** (10 – 24 years old) were more likely to be problem gamblers and engaged more frequently in all gambling activities (Calado & Griffiths, 2016). Research examining racial differences among young gamblers found that **Black youth** were more likely than their White peers to experience the most severe gambling harms, including the finding that gambling initiation predicted suicide ideation among Black youth, while no significant association was found among White youth (Ahuja et al., 2018).

Massachusetts SEIGMA data provides similar findings, where **monthly gamblers aged 18 to 24** were more likely to have experienced gambling *harms* compared to all monthly gamblers. This was most clearly the case for work/school harms: monthly gamblers aged 18 to 24 were between two and two and a half times more likely to have experienced work/school harms compared to all monthly gamblers. However, SEIGMA data collected in 2022 (via the Follow-up General Population Survey, FGPS) found that *problem* gamblers were *not* significantly younger than other gamblers and non-gamblers. That said, data collected approximately one year later

in 2023 (via the Online Panel Survey, OPS) suggest that younger adults are experiencing growing rates of gambling problems in the wake of sports betting legalization.

Three international studies identified characteristics of treatment-seeking online gamblers including: **younger age, male, higher level of education, employed, higher sensation-seeking or impulsivity, single, higher household income and greater household debt** (Estévez et al., 2017; López-Torres et al., 2021; Sancho et al., 2021).

According to New Jersey's player behavior reports, 90% of high intensity bettors (associated with increased risk of harm) were men. Women were still overrepresented among high intensity bettors, with the proportion more than doubling in 2020 from 2019 and trending slightly younger over time. Additionally, New Jersey data indicate that **those who gamble online and in land-based venues** are at increased risk of harm. Notably, individuals who identify as Black/African American and Hispanic are overrepresented in this group.

Massachusetts SEIGMA data reveal that **monthly online gamblers** were far more likely to have experienced gambling harms compared to monthly non-online gamblers, likely due to the greater involvement in gambling of online gamblers compared to non-online gamblers. Data additionally show that **monthly online sports bettors** were far more likely to have experienced gambling harms compared to monthly online gamblers who had not bet on sports.

More broadly, for both land-based and online gambling, research is increasingly demonstrating the ways risk factors intersect, creating overlapping vulnerability to harm. Studies have found **those from lower social class backgrounds or disadvantaged neighborhoods** are more likely to engage in problem and illegal gambling (Barnes et al., 2015). A study in Italy found the social cost of gambling is increasingly concentrated among those of **younger age, lower income, and poorer working conditions** (Resce et al., 2019). Public Health England (2021) also found that gambling is related to health inequities, with the highest prevalence of problem gambling among **people with poor health and low life satisfaction and well-being**. In a scoping review, researchers found **problem gambling is associated with standard poverty measures**: being unemployed, having unstable housing or being homeless, having low income, and living in a disadvantaged neighborhood (Hahmann et al., 2021).

4. What are the impacts of iGaming on youth under the age of 25?

While the impacts on young people of iGaming specifically have not been thoroughly examined, young adults aged 18-24 are consistently identified as at heightened risk of gambling problems and harms from online gambling, including both sports wagering and casino games. Evidence additionally shows that young people are at greater risk of experiencing the most severe harms from gambling, with gambling problems linked to suicide attempts. Underage youth are also at high risk, especially because they are likely gambling on unregulated sites. The dramatic increase in gambling advertising that typically follows legalization of iGaming increases participation, risk, and harm among underage youth and young adults.

Evidence consistently demonstrates that young people are at **increased risk of experiencing problems and harms** from gambling, including from online gambling specifically; see (Tran et al., 2024) for a review. Notably, research has shown that young men and young women are at increased risk of experiencing the most severe harms, with problem gambling appearing to be associated with **suicide attempts**, after adjusting for anxiety, impulsivity, life satisfaction, and other factors (Wardle & McManus, 2021). This suggests “that other mechanisms, such as the severity and multiplicity of harms experienced, or gambling to cope with life stressors, might underpin this relationship” (Wardle & McManus, 2021, p. 39). Another study found that, among Black youth, gambling initiation predicted **suicide ideation** (Ahuja et al., 2018).

New Jersey data show online gamblers aged 18-24 were the **most likely to be high-risk problem gamblers** at 19%, including those who are not of legal age to gamble in NJ. Among New Jersey sports bettors, young adults **show a preference for a riskier form of play**, in-game betting – the percentage of 21-to-24-year-olds betting primarily in-game was either the highest (2018, 2019) or next highest (2020) of any age category.

Impacts are even more severe for those gambling illegally in New Jersey. Emerging adults under age 21 who gambled illegally had **rates of high-risk gambling that were six times the total population** – they gambled the most frequently, across more venues, and on the most activities among all emerging adults. They also had the **highest average PGSI scores** (M=5.66, SD=6.59) and the highest rates of high-risk problem gambling, with nearly 37% reporting symptoms analogous to those for gambling disorder; only 38% reported no problem gambling symptoms at all. For comparison, among those 21 years and older gambling legally the rate of high-risk problem gambling was just two times higher than in the total population. While there is a growing body of research examining risk among underage youth, there is limited evidence on what gambling-related harm looks like for this population.

A large and growing body of evidence has consistently demonstrated the **negative impacts of gambling advertising on behaviors, risk, and harm**; see (McGrane et al., 2023) for a systematic review), particularly for children and young people (McGrane et al., 2023, 2025; Noble et al., 2022a; M. Young et al., 2024), and adults who are already at-risk or experiencing gambling harms (McGrane et al., 2023). Studies have shown that, for young people, exposure to gambling advertising leads to the **normalization of gambling, more positive attitudes towards gambling, greater intentions to gamble, and increased participation** (Di Censo et al., 2024), with one study of adolescents demonstrating a significant relationship between exposure to advertising and gambling in the last month and being classified as an at-risk or problem gambler (Noble et al., 2022b).

5. What are the potential public health impacts of iGaming in Massachusetts overall?

Evidence suggests that legalizing iGaming is likely to lead to increased gambling participation. While it is not likely to have a significant impact on the population-level rate of problem gambling, risk and harms can be expected to increase with participation and

will continue to be disproportionately experienced by vulnerable populations such as young people, non-White populations, and those who are already socioeconomically disadvantaged. Legalization may also increase help-seeking, which may partly be due to consumers becoming more aware of support resources. Without strict guidelines, gambling advertising will become pervasive, with particularly negative impacts to young people and other vulnerable groups. However, a regulated market provides opportunity to reduce and mitigate public health impacts which may already be occurring for those gambling in the illegal market.

Despite a global shift to regulated gambling markets, there is limited empirical evidence on the impacts of legalization on gambling participation and harms. The small number of studies have focused on online gambling generally, or in some cases on online sports wagering markets. (To date there is no published evidence specifically assessing impacts of legalized online casino gambling.) This research has shown that, even if the regulatory objective of legalization is to channel *existing* customers from the current unregulated market, **participation increases**. Ontario experienced a 300% increase in the amount wagered in the first year after legalizing online sports wagering and casino gambling, with a particularly significant increase among young adults (M. Young et al., 2024). A recent SEIGMA report examining the impacts of legalized sports betting in Massachusetts (Volberg et al., 2025) identified, **among monthly gamblers, a rise in past-year participation** in sports betting between 2022 and 2023 (when legal sports betting launched), from 16.7% to 26.9%. Participation remained steady at 32.6% in 2024.

While the population rate of problem gambling is not likely to change significantly (discussed further in Q.5.a below), **increased harm** is likely to follow the increased level of participation, particularly among vulnerable populations (see Q.3 and Q.4). This apparent contradiction is partly explained by the evolved understanding of gambling harms, of which not all are directly tied to the clinical definition of problem gambling. The relationship between harms and problem gambling is not fully understood to date; as research between harm and PG continues, this dynamic will become clearer over time.

A small number of studies have explored the impacts of legalizing new forms of gambling by examining support-seeking behaviours following their legalization. These studies have found that **helpline calls** (Marionneau et al., 2024a; Turner et al., 2024) **and treatment seeking may increase** following legalization, especially among young adults (Chóliz, 2016). Further, a recent study found that following legalization of online casino gambling, this activity accounted for the greatest portion of helpline calls (concurrent with a decline in land-based products as the source of harm) (Marionneau et al., 2024b).

As discussed in Q.4 above, the **dramatic increase in advertising** which typically follows the legalization of a new form of gambling is **likely to increase participation, risk, and harms** particularly for children and young people (McGrane et al., 2023, 2025; Noble et al., 2022a; Young et al., 2024) and adults who are already at-risk or experiencing gambling harms (McGrane et al., 2023).

Legalization can provide an opportunity to reduce and mitigate public health impacts that are already occurring. While there is very limited evidence examining unregulated gambling markets, a small number of studies have outlined their significant consumer protection failings, the financial and economic challenges they pose, and the risks they present in terms of lack of transparency and opportunities for fraud and criminal behaviour (Andrade et al., 2022; Chopin et al., 2024). Supported by adequate monitoring and enforcement of illegal operators, legalization would **increase the integrity and protections present in the iGaming market** and could reduce potential public health impacts currently occurring to those who are gambling in the illegal market.

a) What are the potential impacts on rates of problem gambling?

While decades of global population prevalence research suggest rates of problem gambling (PG) in the population are not likely to change significantly, recent changes to the environment are unprecedented. In this current context, it is difficult to eliminate the possibility of a population-level increase in PG rates. Regardless of whether PG rates increase in the general population, data from Massachusetts and New Jersey suggest rates of PG would increase among certain population groups. In addition, population harm is likely to increase.

Decades of population prevalence would suggest that prevalence rates for problem gambling can be expected to remain relatively stable. However, the proliferation of new forms of gambling (both regulated and unregulated) and modes of access in recent years, supported by unprecedented levels of targeted and personalized marketing and promotion have not yet been fully captured in the published research. In this current context, it is difficult to eliminate the possibility of a population-level increase in PG rates. In addition, data from Massachusetts and New Jersey suggest rates of PG are more likely to increase among certain population groups.

Regardless of whether PG rates increase, population harm would likely increase because of post-legalization increases in participation, particularly among groups at elevated risk of gambling harm (see Q.5). Importantly, gambling harm is not directly associated with the categorization of problem gambling. In addition, stable population prevalence rates of problem gambling conceal a complex disorder at the individual and sub population level. Research has shown that problem gambling is not stable at the individual level, with people moving among different diagnostic levels over time (see examples in LaPlante et al., 2008; Nelson et al., 2009; Williams & Williams, 2025). In addition, the sub populations participating in and experiencing problems from gambling shift over time. Despite this instability at the individual and sub population level, population prevalence rates of problem gambling remain relatively stable, with the caveat that methodological differences in global prevalence research make it difficult to compare prevalence rates across jurisdictions and time periods (Calado & Griffiths, 2016; Gabellini et al., 2023; Tran et al., 2024; Welte et al., 2004).

However, a recent Canadian study (Shaw & Williams, 2024) found that **legal access to online gambling was predictive of gambling problems**. Additionally, some evidence suggests that **problem gambling rates may increase among certain sub-groups**. The recent SEIGMA report examining the impacts of legalized sports betting in Massachusetts (Volberg et al., 2025) identified a **significant increase in problem gambling prevalence among monthly gamblers** between 2022 and 2023 (when legal sports betting launched), from 20.9% to 25.6%. The higher rate was maintained in Fall 2024 at 28%.

New Jersey population prevalence data only began being collected following the state's iGaming legalization. However, this form of gambling remained unregulated in the rest of the country. Rates of high-risk problem gambling in New Jersey were three times the national average, with approximately 9% of adults and 18% of emerging adults classified as high-risk problem gamblers. This comparison to national averages may be interpreted as indicating the impact of the availability of iGaming in New Jersey.

b) What are the potential impacts on populations at elevated risk of gambling-related harm?

As for the population generally, increased availability of iGaming will likely increase participation and harms for at-risk populations. This is particularly important as harms are disproportionately concentrated and severe among those who are already disadvantaged. Additionally, the negative impacts of increased advertising have been shown to disproportionately affect those who are at-risk or already experiencing harms. However, a regulated market can more effectively protect at-risk gamblers, for example through adequate age verification, consumer protection measures, economic integrity and stability, and transparency.

As discussed in Q.5 above, participation in iGaming would likely increase across the general population, including among at-risk populations (as identified in Q.3). As participation increases, both in terms of the number of individuals participating and the extent of individuals' participation, **increased harm can also be expected**, particularly among vulnerable populations.

As discussed in Q.4 and Q.5 above, the **dramatic increase in advertising** which typically follows the legalization of online gambling is **likely to increase participation, risk, and harms** particularly for the most vulnerable populations such as children and young people, and adults who are already at-risk or experiencing gambling harms.

A positive potential impact however, as discussed in Q.5 above, is that a legalized market supported by adequate monitoring and enforcement of illegal operators, would increase the integrity and protections present in the iGaming market. For example, this could occur by **ensuring adequate age verification, consumer protection, economic integrity and stability, and transparency** (Andrade et al., 2022; Chopin et al., 2024), measures which stand to benefit the most vulnerable players.

c) What are the potential impacts on youth under the age of 25?

For the population generally, increased availability of iGaming will likely increase participation and harms for this vulnerable group. This is particularly important as young people have been shown to be susceptible to the most severe harms. Additionally, the potential impacts of increased advertising are especially significant for young people, as operators are targeting them in increasingly innovative and unenforceable ways (e.g., social media, influencer marketing). However, a regulated market provides opportunity to mitigate some key risks to this group, most importantly through strict advertising restrictions, adequate age verification, and special account limits for younger players.

As discussed above, participation in iGaming would likely increase across the population, including among young people. Gambling-related risk and harms, which are disproportionately concentrated and severe among this group (see Q.4), would likely increase in tandem.

Along with the conventional forms of advertising that would dramatically increase following legalization, young people, including minors, would likely be **exposed to even more advertising through emerging digital forms**. Operators are increasingly utilizing methods, such as social media and influencer marketing, which are particularly consumed by, and appealing to, young people (IPSOS Mori, 2020; Rossi et al., 2021; Rossi & Nairn, 2022; Bolat, 2025).

A positive potential impact, as noted above, is that a legalized market, implemented with adequate protections and enforcement mechanisms, **could address and mitigate some of the key risks and harms likely already occurring among young people**. Perhaps most important would be **more effective mechanisms for preventing underage gambling**. As discussed in Q.4 above, data from New Jersey suggest underage youth who gamble illegally may experience very high rates of risk and problems. A regulated framework, supported by effective monitoring and enforcement of compliance and of illegal operators, would better prevent illegal underage gambling and help reduce risk to this vulnerable population. Additionally, a regulated framework could impose **financial safeguards** (e.g., lower wager, deposit, loss limits) for young adult gamblers who may already be experiencing increased harm from their gambling (see Q.3 and Q.4).

6. What are the potential public health impacts of iGaming in Massachusetts in the context of the legal gaming landscape in the region?

Two of the five states surrounding Massachusetts offer legal iGaming (CT and RI), with just four licensed operators across both states. The limitations of such a restricted market, as well as geofencing technology that prevents individuals physically located outside a regulated state market to access its licensee platforms, make it unlikely MA residents are experiencing any impacts from iGaming markets outside the state.

Both neighboring states in which iGaming is legal (CT and RI) function as relatively restricted markets. In Connecticut, iGaming is legally offered only through its two federally recognized tribes (Mashantucket and Mohegan) and DraftKings. Rhode Island's iGaming market is even further restricted, with Bally's extending the monopoly they maintain for land-based gambling in the state. These restricted markets, as well as new advertising restrictions imposed in CT (June 2025), make it **unlikely that MA residents are being exposed to excessive levels of iGaming advertising from outside the state**. Additionally, geofencing technology **prevents individuals physically located outside a regulated state market to access its licensee platforms**.

As three of the five states surrounding Massachusetts have not legalized iGaming, with proposed legislation in New York and New Hampshire stalled, and not at all considered in Vermont, it is **unlikely there is a strong expectation of legalization in MA**. Indeed, the clearest trend in 2024/2025 in the region and beyond is a reluctance to move forward with any gambling expansion, with no new legalization expected to pass in 2025.

Considerations for Policy, Regulation, and Research

The final two questions are answered in the form of specific recommendations drawn from all five study inputs, along with the authors' combined experience and expertise.

7. What further avenues of study and/or study methodologies are recommended to add to the current body of research on iGaming, and which methods should be used to engage in these avenues of study?

Six avenues of study are proposed to address the most significant gaps in the current evidence on iGaming. In the event iGaming is legalized in Massachusetts, these areas of research would be vital in supporting a harm minimization approach.

1. Monitor play behaviour trends

Player data is an essential source of evidence and a powerful tool for transparency with operators. Preparing such data for analysis requires specialized knowledge, infrastructure, and procedures to host player data securely and to manage access for internal or external researchers.

Key initial steps include:

- a. Establish a hub for player data from all licensed operators.
- b. Require all licensed operators to provide player data in agreed-upon formats to the hub.
- c. Require regular reporting from the research team to inform regulatory and public policy.
- d. Consider making such data available to external researchers.

2. Distinguish impact of different online gambling activities

As discussed throughout this report, to date, most research has treated online gambling as a single behaviour, making it difficult for policy makers to distinguish the player profiles, risks, and

other impacts of different activities, particularly between sports wagering and online casino gambling.

Potential approaches could include:

- a. Conduct research to explicitly disentangle the impact of different forms of online gambling, including sports wagering from online casino.
- b. Examine differences or similarities in participation, play profiles, socioeconomic variables, risk of problem gambling and harm, and trends over time.
- c. Ensure research design encompasses the level of gambling involvement in all forms of gambling to understand the heightened risk for mixed mode gamblers.
- d. Conduct longitudinal cohort research as this represents the best way to understand the impact of any change in legal gambling.
- e. Conduct research on illegal gambling to understand the current market and any changes of online casino gambling is legalized.

3. Monitor changes in early intervention and treatment

A small number of studies have examined changes in treatment seeking behaviors as an indicator of impacts to harm from legalizing new forms of gambling. This could be one of multiple approaches to prepare for in the event of legalization.

This could involve establishing research to monitor and study changes in helpline calls and treatment seeking, including primary reasons for help-seeking in terms of motivations (self, partner, other family, workplace) and forms of gambling that were most problematic. Include focus and analyses of sub populations such as young adults, and people who do not identify as White.

4. Establish a research program on youth and young adults

The distinct vulnerabilities, behaviors, and risk profiles of both underage youth and young adults make it essential to better understand impacts and to inform prevention, treatment, and regulatory approaches targeting these population groups.

The first step should be to identify research already taking place in the state, such as the *Massachusetts Youth Health Survey* and establish coordination to avoid overlap. Specific topics should include:

- a. Longitudinal research to understand the changing role of gambling in the lives of adolescents and young adults, the risk and causal factors, and specific trends including:
 - adolescents' online social gambling behaviours; and
 - emerging and converging gambling and gambling-like activities.
- b. Impact of advertising – volume and placement, social media advertising, including influencers.
- c. Vulnerable populations e.g., cultural minorities and adolescents not attending school.
- d. Treatment and recovery programs and related efficacy studies (To date, there does not appear to be any gambling treatment program designed and empirically tested for effectiveness for young adults and adolescents (Christakis et al., 2025)).

5. Include longitudinal, cohort research design

Massachusetts has conducted world-leading longitudinal research on the impact of introducing land-based casinos, including multi-year cohort research which is the gold standard for understanding the impact of changes in the gambling environment. Should Massachusetts introduce regulated iGaming, longitudinal research, including examining sub-populations most vulnerable to harm, should be undertaken.

6. Develop an evaluation framework to guide operator reporting

While evaluation is a key element of a public health approach, it is rarely undertaken effectively, if at all. Establishing a framework for evaluation will improve the way impact is measured and the value of the reporting to policy makers.

The evaluation framework should be established at the earliest stages of developing the regulatory framework and implemented at launch. Importantly, it should include the markers of harm, metrics, timeframes, customer outcomes, and reporting protocols that operators are required to measure.

A well-designed and implemented evaluation framework will enable the regulator and policy makers to understand the real impacts of expansion, as well as the effectiveness of consumer protection measures that are required of operators.

8. What are responsible gaming considerations related to iGaming to minimize gambling-related harm, and what kinds of responsible gaming initiatives should be considered if iGaming were legalized?

Twelve recommendations are proposed across five categories:

- Make harm minimization the foundation of regulation
- Ensure multiple levels of protections
- Maximize economic development to support public health
- Maximize channelization to achieve objectives
- Ensure adequate enforcement to support objectives

While certain recommendations may appear beyond the scope of responsible gambling, they are all essential to establishing and implementing a regulatory framework for iGaming that will effectively minimize harm to players and the wider community.

Make harm minimization the foundation of regulation

1. Establish harm minimization as the primary objective of legalization

Across global jurisdictions, consumer protection and economic development are the most commonly cited objectives for legalizing new forms of gambling. However, these objectives may be inadvertently restrictive; for example, by neglecting important protections for the wider (non-

consumer) population, and by limiting economic benefits to serve large, multi-national operators rather than the local community.

Going slightly further, establishing harm minimization as the primary objective implies an expanded mandate that can more effectively reduce public health impacts to the population, specifically by:

- Protecting the wider Commonwealth population (i.e., not just consumers of gambling).
- Maximizing economic development for the explicit purposes of minimizing harm to the wider population and generating benefits to the community.
- Actively monitoring and reducing the unregulated (illegal) market, where harms will continue to occur.

This approach will ensure all aspects of regulation are designed from a harm minimization perspective in order to mitigate public health impacts to the population to the greatest extent possible.

2. Harmonize protections across all online gambling activities

Massachusetts currently offers legal online sports wagering and will introduce online lottery in 2026. If a strong harm minimization-focused iGaming regulatory framework were introduced, it would be important to ensure its principles and protections would be harmonized across all forms of online gambling.

This is particularly important for iLottery, as online lottery games are increasingly resembling the riskiest online casino games (i.e., slots-like games) in terms of customer experience. Massachusetts appears to have acknowledged the additional risk inherent in iLottery by establishing the minimum age at 21, rather than 18, as it is for in-store purchases.

Ensure multiple levels of protections

A regulatory framework intended to mitigate public health impacts should consider the entire population, beyond just those who participate (legally) in iGaming. While player protection guidelines are essential, areas of focus such as advertising restrictions, limits on promotions and inducements, and prevention research and programming help protect all individuals from excessive exposure and potential risky engagement with iGaming.

3. Protect the population

Without robust restrictions, gambling advertising will increase dramatically following legalization, as seen in other US states and beyond. Excessive advertising overexposes everyone to gambling, including underage youth and at-risk populations. It will be important to establish strict, strategic advertising guidelines from the outset to avoid the challenges, currently facing many global jurisdictions, of reining it in once it has become a public health issue.

a. Establish rigorous advertising restrictions

- Understand the strategies and challenges seen in other jurisdictions

- Establish key targets for restrictions (e.g., populations to protect, limits on volume, channels and media used, cross promotions, predatory bonuses, etc.)
- Assess required collaborations to effectively monitor and enforce compliance (e.g., broadcasters, government divisions, etc.)
- Establish meaningful penalties

A second key initiative to protect the wider population would be to establish mechanisms to monitor impacts to the population and inform evidence-driven changes to policy and regulation as needed. This includes an internal/external research program that is harmonized with the research recommendations made in response to Q.7 and the current SEIGMA project, and includes collaboration between the regulator, an academic research hub, and licensed operators. The primary activities of this collaboration would include conducting regular population prevalence research and analyzing operator-submitted player data annually to monitor changes in participation and behaviors post-legalization. Other mechanisms should include community-based research and a forum for the voices of lived experience.

b. Expand MGC's independent research program to monitor population public health impacts

- Review model programs (e.g., New Jersey)
- Identify potential collaborators (e.g., academic institutions, community agencies, etc.)
- Establish operator requirements for data collection and submission
- Establish reporting objectives and schedule

c. Consider other community-driven approaches for informing regulatory and policy decisions that minimizes harm, such as:

- A lived experience committee or forum, including families of those who gamble
- Community research targeting key populations (see Q.6)

4. Protect underage youth

Underage youth are likely already experiencing harms from gambling. Unfortunately, regulatory frameworks often neglect to address this vulnerable group. With an expanded approach to minimize public health impacts to the wider population, an iGaming framework should include strict requirements for protecting underage youth from excessive exposure to gambling as well as from illegal participation.

a. Address digital advertising methods that implicitly target young people

- Assess occurrence of social media advertising and influencer marketing
- Include specific restrictions and licensing conditions to prevent operators from advertising via social media and influencer marketing
- Assess required resources to effectively monitor and enforce compliance
- Establish meaningful penalties

b. Monitor and reduce illegal underage gambling

- Assess best practice requirements for age verification
- Establish strict requirements
- Monitor and enforce severe penalties for failures
- Actively monitor and reduce the illegal market (see #11 below)

5. Protect players and their families

Protecting players is one of the central purposes of a regulatory framework. However, to effectively mitigate impacts to the population, in addition to more conventional approaches to minimize harm to players, it would be important to implement protections which consider families and loved ones. This is particularly crucial for online gambling where technology facilitates concealment of gambling and related harm from family (Fulton, 2019).

- a. Establish an industry-leading set of requirements for player protection tools, e.g.:**
 - Requirement that tools be opt-out rather than opt-in (require that all players receive education on each RG feature at sign-up, combined with the option to set their own initial limits, accept default limits, or opt-out entirely).
 - Consider building on the PlayMyWay program in use throughout land-based operations.
- b. Establish industry-leading requirements for player monitoring/interaction, e.g.:**
 - Maintain an evidence-based risk identification system.
 - Adequately respond to identified risk, including case management and escalation of responses as risk increases.
 - Conduct regular evaluations of effectiveness of risk identification/response activities.
 - Consider an expanded role for GameSense advisors in player interactions.
- c. Implement evidence-based requirements/initiatives to limit financial harm, e.g.:**
 - Prohibit third party payers which can disguise transactions (and essentially remove transparency and accountability from operators for protecting customers from financial harm).
 - Prohibit operators from allowing risky financial behaviors e.g., withdrawal reversals, repeated declined deposits, use of eWallets or other risky funding sources, etc.
 - Engage financial institutions to develop new resources, or promote existing tools, to support customers in monitoring or reducing gambling expenditures.
 - Consider introducing an affordability-based approach, for example establishing spend thresholds beyond which customers must provide information to demonstrate their ability to afford higher spend.
- d. Implement evidence-based requirements/initiatives to limit harm to families and affected others, e.g.:**
 - Extending the family exclusion capacity in the existing regulatory framework to establish a clear, accessible process for families to protect themselves from harm caused by a loved one's gambling.

- Develop educational resources to support families to gain more awareness and control of their financial situations.
- Engage financial institutions to support families, for example offering tools to limit or block gambling spend, and providing joint account holders with enhanced transparency, reporting and protections.

6. Protect young players

Young players, generally considered those aged under 25, are at an increased risk for gambling problems and harms. In addition to the protections in place for all players, an iGaming framework should consider additional targeted protections for this higher risk group of players.

a. Establish targeted account-based limits, such as:

- Reduced wager, monthly deposit, monthly loss limits (with requirements to demonstrate affordability to exceed thresholds, if desired)
- Additional requirements on use of RG tools
- Restrictions on marketing, bonuses, and promotions

b. Limit cross-promotion of gambling activities

- Prohibit promotion of iGaming via sports wagering platforms, and vice versa
- Consider limiting operators to one activity per platform (i.e., not offering both sports wagering and casino games through a single account)

7. Prepare for increases in help-seeking

Should iGaming be legalized, it is expected that help-seeking will increase post-launch. This may be the result of a combination of increased participation and harm, as well as greater awareness of resources.

a. Ensure support resources are promoted, including in all advertising and platforms

b. Ensure there is capacity for increases in treatment seeking

- Particular focus on supporting young people and those groups who may be at increased risk of experiencing harm

c. Monitor and report on impacts (see Q.6)

Maximize economic development to support public health

iGaming is considerably more profitable for operators, has higher participation across the population, and is increasingly correlated with higher levels and more severe risk and harm. However, online gambling in general has a smaller economic footprint in the local economy than land-based gambling, meaning more revenue is likely to leave the state. Working from a primary goal of reducing harm and impacts to public health, it will be important to ensure that economic development from iGaming is adequate to support the infrastructure and programming needed for effective harm minimization efforts, and that it primarily benefits the local community, rather than foreign operator profits.

8. Establish taxation suited to MA's needs and expectations

Approaches to taxation of online gambling are highly varied and dynamic across global jurisdictions. While certain benchmarks exist, it would be in the best interest of the Commonwealth to determine its own rate based on its unique needs and expectations.

Establishing a suitable tax rate may include:

- a. Review taxation frameworks and recent changes in other national and global markets
- b. Consider programming and infrastructure that taxation, fees, or levies should fund, e.g.:
 - Regulatory framework elements (e.g., evaluation framework)
 - Collaborative research hub
 - Other harm minimization research or programming
 - Enforcement resources to monitor and reduce the black market
- c. Establish a realistic tax rate with room to monitor and adapt

9. Generate economic benefits for the community

The non-physical nature and vertically disintegrated model of iGaming are less conducive to certain economic development objectives such as local investment and employment. To maximize economic benefits to the community, it will be important to impose thoughtful requirements that prioritize local business.

Measures may include:

- a. Where possible, require or provide incentives for operators to source locally (e.g., staffing, servers and IT equipment, and other supply chain vendors).
- b. Provide favorable conditions to local businesses for licensing and for vendor registration, including education on the regulatory regime, and support in understanding and addressing regulatory requirements.
- c. Provide favourable taxation and fee conditions for local small and medium businesses, especially in their first year of operations.
- d. Severely restrict promotions, bonuses, and advertising volume to avoid large, multi-national, well-resourced operators outspending competitors to acquire new customers.
- e. Create a local testing lab to enable skilled employment opportunities and provide an ongoing source of learning for the regulator and policy makers regarding industry products, features, and practices.

Maximize channelization to achieve all objectives

Channelization is the key mechanism for achieving all objectives and benefits of legalization, by channelling as many customers as possible from the unregulated to the regulated market. This ensures that players benefit from the significantly better protections and integrity of the legal market, and that harm minimization measures are permitted to succeed by fostering legitimate economic development and eliminating illegal gambling (e.g., underage).

10. Make the gray market black

A key factor in achieving a high channelization rate is reducing (or eliminating) the unregulated market. Legalizing iGaming and establishing a regulatory framework will not in itself eliminate

the gray (unregulated) market. It will be important to make it explicit that unregulated operators offering iGaming are operating illegally, and to implement strong monitoring and enforcement mechanisms to support the legal market and reduce illegal gambling.

Key steps include:

- a. Ensure clarity for the gambling activities that require licensing, prohibiting the remaining gambling-like activities, including establishing related penalties.
- b. Close any legal loopholes surrounding prohibited gambling-like activities (e.g., casino sweepstakes, prediction markets, fantasy sports)
- c. Prohibit/exclude suppliers that serve illegal operators from the legal market; require supply chain transparency and accountability of license operators (e.g., through regular reporting and audits).
- d. Ensure the scope of licensing requirements encompasses the critical supply chain¹⁰, including payment processors, marketing agencies, etc.
- e. Ensure vendor registration is comprehensive and rigorous but also has a fast-track review process to make it possible for new small and medium business entrants to participate in the market while full due diligence is completed.

Enable adequate enforcement to support all objectives

11. Ensure adequate capacity and resources for enforcement

In addition to the normal tools provided that enable regulators to monitor and enforce compliance among licensed operators, it is important that the legislative and regulatory framework additionally empowers the regulator, in collaboration with law enforcement bodies, to pursue and take action on the unregulated market.

12. Work towards collaborative enforcement

Online forms of gambling are not physically confined to any state or jurisdiction, which makes them more challenging to regulate entirely through conventional state-level methods.

Collaboration with other state agencies and the federal government is needed to effectively tackle enforcement, particularly for preventing access to illegal operators and restricting advertising, including social media and influencer advertising which occur on online platforms that often operate outside state laws and jurisdiction.

Approaches to maximize and collaborate for enforcement include:

- a. Provide state regulatory and law enforcement bodies with monitoring and enforcement responsibilities and tools, including to pursue the black market.
- b. Engage other state departments in coordinated efforts, including those responsible for:
 - Consumer protections
 - Advertising standards

¹⁰ Gambling operators are increasingly vertically dis-integrated, creating a complex system of suppliers located in global jurisdictions that offer the most cost-effective labour for game developers, aggregators, affiliates, etc.

- Protecting children and youth
 - Digital/technology
 - Corporate registration (to potentially de-register companies that don't comply)
- c. Assess existing global enforcement efforts and their applicability/adaptability to US laws and regulations.
 - d. Establish a collaborative task force across states and with the federal government to reduce the black market.
 - e. Join in lobbying the federal government for accountability of social media platform providers (which are currently shielded from state laws and enforcement) to:
 - Reduce or close the black market
 - Protect children and youth from excessive and unregulated gambling advertising
 - f. Engage financial institutions to contribute to protections for consumers and families, and to support other aspects of enforcement (e.g., blocking transactions from illegal operators).

Conclusion

This research report brings together findings from five sources to inform the consideration of legalizing iGaming in Massachusetts. This research project has illustrated the complexity of such a decision. It is clear that legalization of a new gambling activity will likely lead to increased participation, and with that, harms, which are disproportionately experienced by young people and other socio-economically disadvantaged populations. On the other hand, a regulated market does provide opportunities to address public health issues which are likely already occurring, such as underage gambling, unprotected gambling, and unregulated advertising.

Following a trend towards opening new gambling markets, no new legislation to expand gambling has passed in any US state in 2024 and 2025 (as of publication in December 2025). This may be due to a combination of unmet economic expectations as well as growing evidence and concerns related to impacts on public health. Additionally, the excessive levels of advertising which have followed legalization in markets worldwide have created widespread alarm and dismay.

It appears that the remaining US states (including Massachusetts) are learning from the experience of other jurisdictions and carefully considering the implications and options for legalizing additional forms of gambling, especially online casino gambling. This report examines these and other implications of legalizing iGaming in Massachusetts and proposes policies and considerations that would minimize negative impacts to public health while maximizing the economic benefits to the Commonwealth. It is hoped the findings and recommendations presented here will support policy makers in their deliberations on these important issues.

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Potential Impacts of iGaming on Public Health in Massachusetts (Final Report to the MGC)

MGC Public Meeting
May 21, 2026

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Contents

- Purpose & Context
- Inputs & Methods
- Key Findings (highlights)
- Conclusions / Potential Public Health Impacts
- Conclusions / Considerations for Policy, Regulation & Research



Purpose & Context

As Massachusetts is considering expanding its current regulated gambling market to include iGaming, the MGC commissioned this study to examine the potential impacts on public health, as well as the key considerations for policy, regulation, and research in the event iGaming is legalized.



Study Objectives

- 1 Assess the **potential impact of iGaming on public health** in the Commonwealth, with particular focus on impacts to:
 - gambling participation
 - gambling-related harms
 - young people under the age of 25
- 2 Identify **considerations for policy, regulation, and research** that may minimize risk of harm in the event iGaming is legalized in the Commonwealth



Research Questions / Understanding Potential Impacts

- 1 What are the characteristics of those who participate in iGaming compared with those who participate in other forms of gaming (both online and land-based)?

- 2 What is the relationship of participation in iGaming with problem gambling, and are there higher levels of risk related to certain types of gambling activities?

- 3 What populations are at highest risk of gambling-related harms from iGaming?

- 4 What are the impacts of iGaming on youth under the age of 25?

- 5 What are the potential public health impacts of iGaming in Massachusetts overall?
 - a. On rates of problem gambling?

 - b. On populations at elevated risk of gambling-related harm?

 - c. On young people under the age of 25?

- 6 What are the potential public health impacts of iGaming in Massachusetts in the context of the legal landscape in the region?

Research Questions / Considerations for Policy, Regulation & Research

- 7 What further avenues of study and/or study methodologies are recommended to add to the current body of research on iGaming, and which methods should be used to engage in these avenues of study?

- 8 What are responsible gaming (RG) considerations related to iGaming to minimize gambling-related harm, and what kinds of RG initiatives should be considered if iGaming were legalized?

These two questions are answered in the form of specific recommendations drawn from all five study inputs as well as the authors' collective experience and expertise.

Gambling Policy Context / Regional & National Trends

New gambling legislation has stalled across the Northeast and beyond, likely due to unmet revenue expectations and other social issues occurring in regulated markets.

- As of March 2026, eight US states offer legal iGaming; 32 states offer legal online sports wagering.
- Only two of the five states bordering Massachusetts offer legal iGaming (CT and RI), with legislation stalled or not considered in the other three (NH, NY, VT).
- Legislation and broader efforts to expand gambling have stalled throughout the US, with no new bills passed in 2025.
- Political will to expand legal gambling markets appears to have been tempered by multiple factors:
 - economic – tax revenue shortfalls
 - social – harassment of athletes, excessive advertising, inadequate player protection
- At least nine states have increased the tax rate on sports wagering since 2023 – appears to be consensus on ~20%.

Study Inputs & Methods

Five key inputs informed answers to the research questions.



Inputs & Methods / Overview

1 Evidence Review

Review and summary of the latest scientific evidence on the risks associated with iGaming, the impacts of legalization of new forms, and harm minimization approaches.

2 New Jersey Prevalence & Player Data Reports – 2016-2021

Extraction of key findings from reports published by the New Jersey Division of Gaming Enforcement, to provide insight into the real-world impacts of regulated iGaming.

3 Social & Economic Impacts of Gambling in Massachusetts (SEIGMA) Data – 2022-2024

Secondary analyses of data from the SEIGMA study, to establish the current state of gambling in Massachusetts, including prevalence and vulnerable populations.

4 Policy Review: Surrounding States & National Trends

Review of gray literature and policy documents to assess the gambling regulatory and policy context in the states surrounding Massachusetts and beyond.

5 Informant Interviews

Semi-structured interviews to collect insights and learnings from regulatory and industry experts in two established iGaming markets (New Jersey and Ontario, Canada).

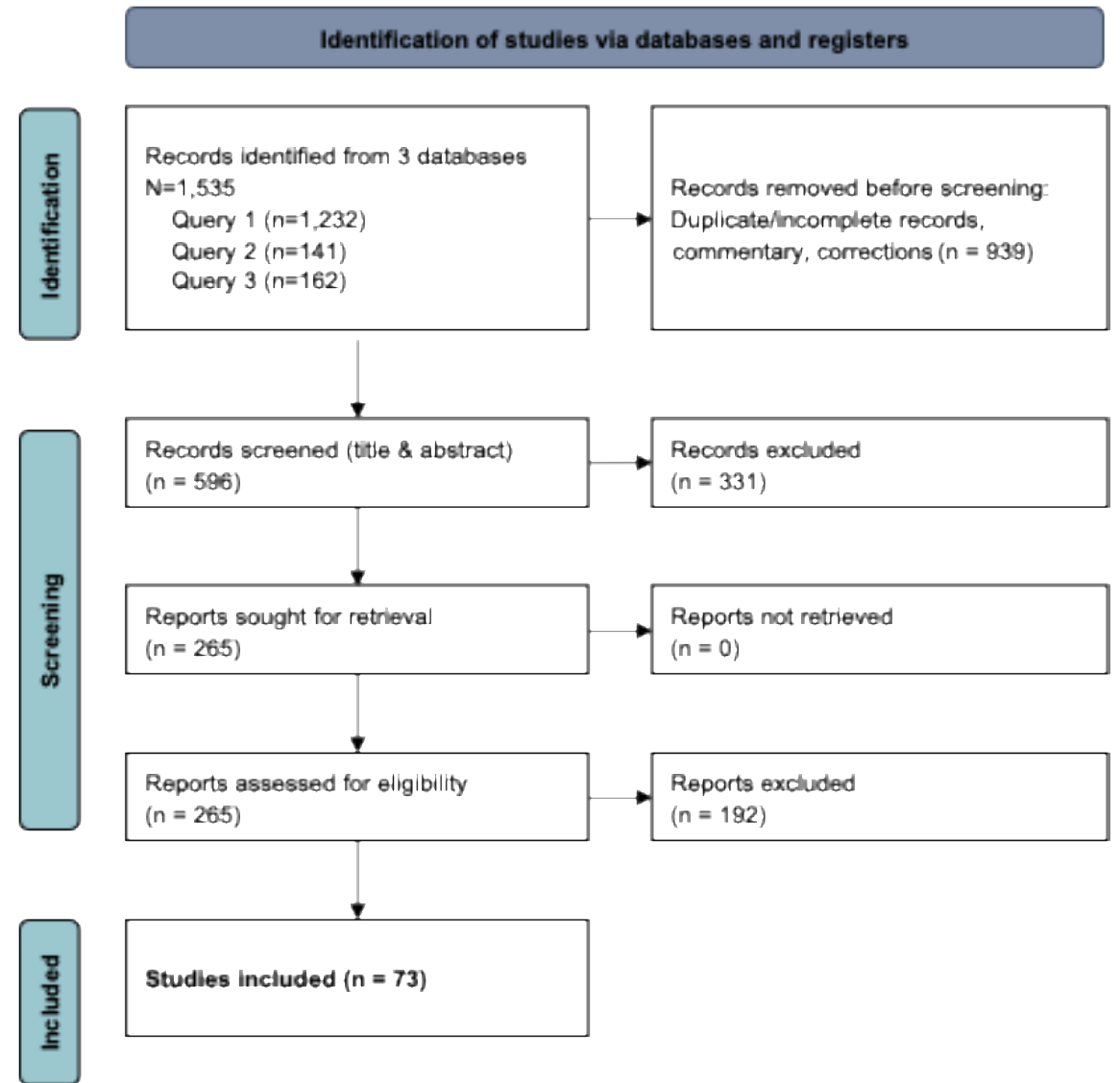
Inputs & Methods / Evidence Review

PRISMA 2020 protocol

Three queries were used to guide search:

- i. Risks associated with online casino gambling
- ii. Implications of legalizing new forms of gambling
- iii. Effective approaches and strategies for reducing and preventing gambling harm

n=73 articles included



Inputs & Methods / NJ Prevalence & Player Data Reports

- New Jersey was an early entrant into regulated iGaming
- Accounts for approximately one third of national revenue among those US states that offer iGaming
- Extracted findings provided insight into characteristics of online casino gamblers, relationships between iGaming and risk/harm, and impacts on vulnerable populations, including young people
- Findings were extracted from analytical findings from the following reports:
 - **Prevalence studies** – conducted in in 2016 and 2021
 - **Player data reports (online gambling)** – data collected annually from 2016 through 2021
 - **Player data reports (sports betting)** – data collected annually from 2019 through 2021

The NJ reports are a result of a policy decision to require industry to fund yearly reports.

Reports are commissioned by the state gambling regulator (DGE). Prepared by the CGS at Rutgers University.

CGS team statistically analyze every bet placed for iGaming in the state (since 2014) and sports wagering (since 2018).

Findings inform policy recommendations to regulators based on ongoing trends.

Inputs & Methods / SEIGMA Research

- New analyses of data from online panel surveys which were conducted in 2022, 2023 and 2024 as part of the SEIGMA research.
- Analyses examined differences between regular gamblers who gamble online compared with regular gamblers who do not gamble online.
- Additional analyses among regular gamblers who gamble online, to examine the differences between those who do or do not gamble on sports.
- Among those who gamble online on activities other than sports, it was not possible to isolate those who gamble on casino games. However, it was one of the activities included in the list.

Analyses intended to provide insight into characteristics of those who participate in iGaming

vs.

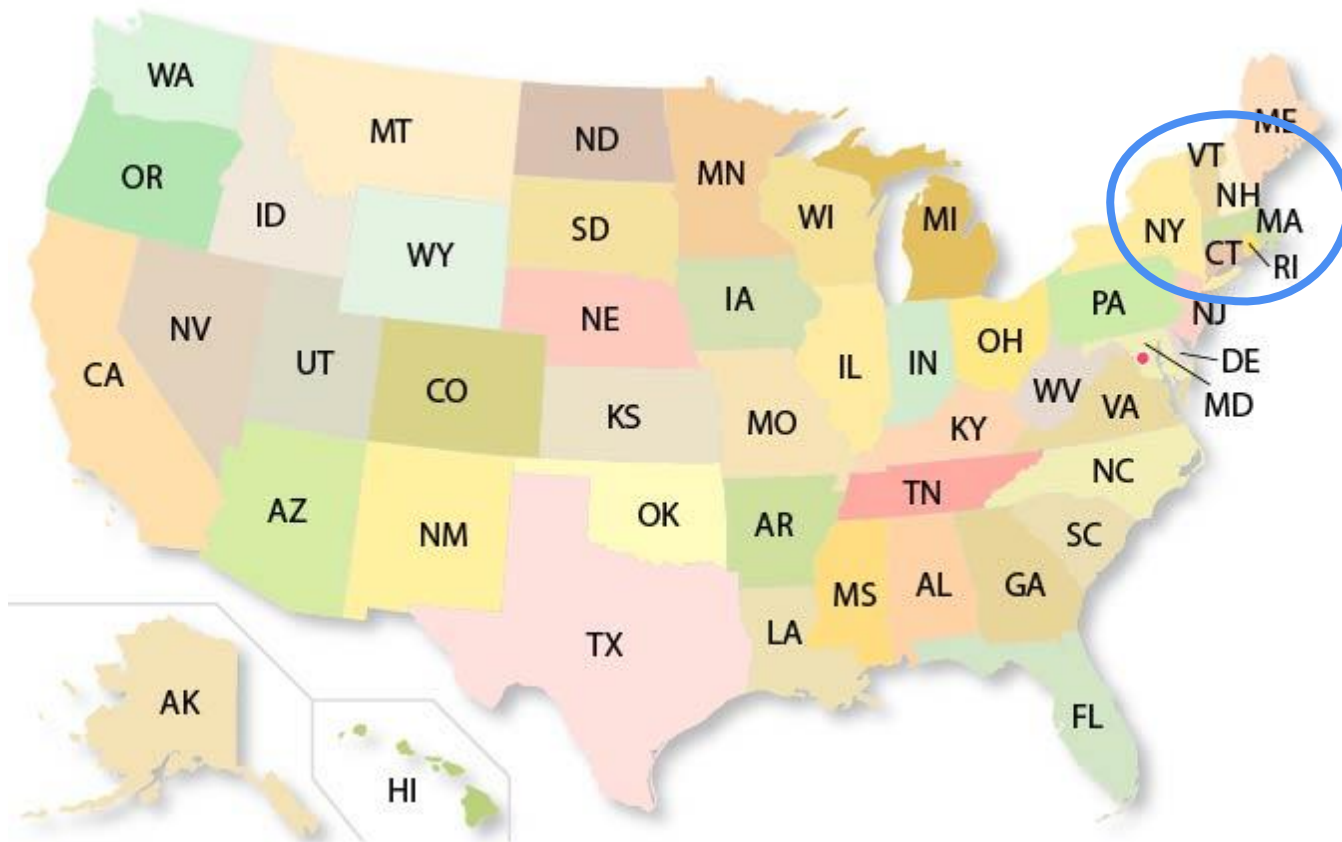
those who participate in other forms of online gambling, such as sports wagering and lottery.

Online panel samples for analysis

Online Panel	Overall Sample	After Removing Duplicates	%	Gambled Monthly or More	%
FOPS 2022	3038	3038	100	1631	53.7
OPS23 2023	3380	3215	95.1	1866	58.0
OPS24-Spring	3383	3241	95.8	1916	59.1
OPS24-Fall	3045	2806	92.1	1577	56.2

Inputs & Methods / Policy Review

- Included gray literature sources including government, agency, and industry web pages, news stories, and reports.
- Examined the five states bordering Massachusetts to provide an overview of legal gambling offerings and harm minimization policy and regulations.
- Examined national trends related to the expansion of gambling markets in the US.



Inputs & Methods / Informant Interviews

- Four in-depth interviews with three former regulators and one industry association leader.
- To understand the experience and key learnings from opening online gambling markets in New Jersey and Ontario.
- Experts were asked to describe:
 - Primary drivers for market opening
 - Regulatory design
 - Unanticipated issues, challenges or successes
 - Key learnings and recommended actions for policy, programming, research, regulatory approach, monitoring, and enforcement.

Key Findings (highlights)

Findings from all five inputs informed the study's conclusions.



Key Findings / Evidence Review

- While research examining online casino gambling (iGaming) specifically is limited, recent evidence suggests that this form may be associated with increased risk.
- Particularly as a result of being a “continuous” form of gambling that allows for rapid, intense play for long periods of time.
- Evidence continues to indicate that young people, particularly males, have heightened vulnerability to gambling risk and harm.
- A small body of research suggests that legalization of new forms of gambling may lead to increased participation and harms.

Key Findings / NJ Reports

- Individuals who gamble in mixed venues (both land-based and online) have the highest rates of problem gambling, followed by those who gamble online only.
- There are notable increases in women gambling online, and in the number of gambling activities young adults participate in.
- Low-income individuals and students are the biggest online gamblers.
- Those who identify as Asian, Black/African American, and Hispanic are overrepresented among those who gamble online.
- Black/African Americans were most likely to be high-risk problem gamblers (15.9%).
- Emerging adults (18-24) gamble at higher frequency and have higher rates of problem gambling risk.
- Young people under 21 who gamble illegally had the highest average PGSI scores and the highest rates of high-risk problem gambling (nearly 37% reporting symptoms).
- More than 70% of young sports bettors place in-game bets, the riskiest form of sports wagering.

Key Findings / SEIGMA Data

- Monthly online gamblers have higher levels of participation and problems, are more likely to be classified at high- or very high risk, and to have experienced all types of harm, compared to non-online gamblers.
- Monthly online sports bettors were more likely to be male, aged 25-34, have annual household incomes over \$100,000, and to have a graduate or professional degree, compared to online non-sports gamblers.
- Monthly online sports bettors were more likely to have experienced gambling problems and harms, with the greatest differences for family/relationship, financial, and emotional/psychological harms compared to online non-sports gamblers.
- Monthly young gamblers (18-24) were more likely to be male in 2022, but more likely to be female in the Fall 2024 survey.
- Monthly young gamblers were increasingly more likely to be non-White with increases greatest among Black young adults.
- Monthly young gamblers were more likely than all monthly gamblers to have experienced gambling problems and harms, particularly work/school harm.

Key Findings / Policy Review

- Eight US states offer legal iGaming; 32 states offer legal online sports wagering.
- Only two of the five states bordering Massachusetts offer legal iGaming (CT and RI), with legislation stalled or not considered in the other three (NH, NY, VT).
- Legislation and broader efforts to expand gambling have stalled throughout the US, with no new bills expected to pass in 2025.
- Political will to expand legal gambling markets appears to have been tempered by several economic (tax revenue shortfalls) and social factors (harassment of athletes, excessive advertising, inadequate player protection).

Key Findings / Informant Interviews

- Prior to legalization, states should:
 - (1) Assess the economic potential and set realistic revenue expectations, to establish:
 - appropriate taxation rate
 - other policies to maximize local economic benefits (e.g., prioritization of SMEs, requiring a local presence)
 - (2) Establish clear policy and regulatory goals, and ensure adequate structures to support them
- Key areas requiring stringent policy and regulatory guidance include advertising, AML, and consumer protection.
- A rigorous, independent research program should be established from the outset, to enable evidence- and data-driven decisions and updates to policy and regulation.
- A regulated market does not eliminate the black market – states should concurrently implement strategies for effective monitoring and enforcement of illegal operators.

Conclusions / Potential Public Health Impacts



Potential Public Health Impacts / Harms & Problems

- Evidence suggests legalization (of any form) increases participation ¹⁻³
- Increased participation can be expected to lead to increased risk and harms
- Across all forms of gambling, research shows that harm is disproportionately experienced by vulnerable populations, including:
 - young people ⁴⁻⁶
 - non-White populations ^{7, 8}
 - those who are already socioeconomically disadvantaged ⁹
- Online gamblers (any activity) are more likely to experience harm than land-based gamblers ¹⁰⁻¹⁴
- Previous prevalence research suggests PG rate may not change significantly at *population level* ¹⁵
- Pre- and post-legalization data from MA and NJ suggest PG rates may increase *within certain population groups* (young people, at-risk gamblers) ^{16, 17}
- Gambling advertising has been found to increase participation, risk, and harm among certain vulnerable populations (young people, at-risk gamblers) ¹⁸

Potential Public Health Impacts / Risks to Young People

SEIGMA data:

- Young monthly online gamblers (18-24) are more likely than older (25+) monthly online gamblers to experience all types of gambling-related harms ¹⁹

New Jersey data:

- Among all online gamblers, those aged 18-24 were most likely to be problem gamblers (19%) ²⁰

Global research:

- Young people are more likely to experience the most severe harms from gambling (suicidality) ²¹
- A 2024 prevalence study found PG among those who gamble online was highest for those aged 18-24 at 15.8% (compared to 8.6-10% for the whole population) ²²
- Studies show the excessive levels of advertising that typically follow legalization increase participation, risk, and harm among young adults and underage youth ²³

Potential Public Health Impacts / Relationship Between iGaming & Risk

- Participation in online gambling (any form) is associated with higher rates of problem gambling and harm ²⁴⁻²⁸
- Some research suggests “breadth of involvement” (participating in multiple modes/activities) is a stronger predictor of risk than any individual mode/activity ²⁹⁻³⁷
- Emerging research suggests iGaming, particularly slots, may be associated with elevated risk ³⁸⁻⁴⁰
 - Online slots are a “continuous form” (allow for rapid play for long periods)
 - Evidence consistently demonstrates continuous forms = higher risk ⁴¹⁻⁴³
- A recent study indicates iGaming is associated with higher risk even when controlling for involvement ⁴⁴
- Recent research suggests at-risk gamblers may be more likely to participate in iGaming ⁴⁵⁻⁴⁷

Conclusions / Considerations for Policy, Regulation & Research



If iGaming is legalized in Massachusetts, a number of policy and regulatory strategies could help minimize the potential negative impacts and maximize benefits.

The report proposes **12 strategies** across five key principles. Implementation of these strategies will require external action by policy makers, including:

- (1) providing direction and resources to MGC and other agencies
- (2) including provisions in any new bill to legalize iGaming
- (3) enhancing the tools and powers of the regulator

A research agenda is proposed as a resource to enable ongoing evidence-based decision-making

Summary of Strategies

Principle 1: Make harm minimization the foundation of regulation

- 1 Establish harm minimization as the primary objective of legalization
- 2 Harmonize protections across all online gambling activities

Principle 2: Ensure multiple levels of protections

- 3 Protect the population (restrict advertising and monitor public health impacts)
- 4 Protect underage youth (target unlawful advertising, e.g., social media and underage gambling)
- 5 Protect players and their families (require adequate tools/resources and third-party mechanisms)
- 6 Protect young players (establish targeted limits and limit cross-promotion of products)
- 7 Prepare for increases in help-seeking

Principle 3: Maximize economic development to support public health

- 8 Establish taxation suited to the Commonwealth's needs and expectations
- 9 Generate economic benefits for the community (e.g., priority for SMEs, requiring local supply chain presence)

Principle 4: Maximize channelization to achieve all objectives

- 10 Delineate the regulated versus the illegal market and establish enforcement structures

Principle 5: Ensure sufficient mandate and resources to achieve objectives

- 11 Enhance resources and capacity for monitoring compliance (of regulated and unregulated markets)
- 12 Work towards collaborative enforcement (with other state and federal agencies)

Research Agenda

Six avenues of study to address the most significant evidence gaps and enable informed decision-making.

- 1 Monitor play behavior trends

- 2 Distinguish impact of different online gambling activities

- 3 Monitor changes in early intervention and treatment

- 4 Establish a research program on youth and young adults

- 5 Include longitudinal, cohort research design

- 6 Develop an evaluation framework to guide operator reporting

Questions / Discussion



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Quarterly Report Q1 2026

May 21, 2026
Massachusetts Gaming Commission

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BOSTON HARBOR
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Gaming Revenue, Taxes & Lottery Sales

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Gaming Revenue & Taxes: Q1 2026

Month	Table Games GGR	Slots GGR	Total GGR	State Taxes Collected
January	\$22,020,781.76	\$37,641,979.13	\$59,662,760.89	\$14,915,690.22
February	\$22,403,071.45	\$33,887,740.37	\$56,290,811.82	\$14,072,702.96
March	\$25,398,484.66	\$38,925,327.36	\$64,323,812.02	\$16,080,953.01
Total	\$69,822,337.87	\$110,455,046.86	\$180,277,384.73	\$45,069,346.19

Gaming Revenue & Taxes: Year-Over-Year

Year	Quarter	Table Games GGR	Slots GGR	Total GGR	State Taxes Collected
2025	Q1	\$77,646,987.06	\$106,086,032.96	\$183,733,020.02	\$45,933,255.01
	Q2	\$76,765,038.95	\$110,256,987.21	\$187,022,026.16	\$46,755,506.54
	Q3	\$72,661,542.20	\$111,649,122.65	\$184,310,664.85	\$46,077,666.22
	Q4	\$67,298,005.92	\$111,797,717.38	\$179,095,723.30	\$44,773,930.83
	Total		\$294,371,574.13	\$439,789,860.20	\$734,161,434.53
2026	Q1	\$69,822,337.87	\$110,455,046.86	\$180,277,384.73	\$45,069,346.19
	Q2				
	Q3				
	Q4				
	Total (to date)		\$69,822,337.87	\$110,455,046.86	\$180,277,384.73

Sports Wagering Revenue & Taxes: Q1 2026

Month	Monthly Win	State Retail Taxes Collected
January	\$223,899	\$31,389
February	\$310,196	\$44,898
March	\$294,886	\$42,632
Total	\$828,981	\$118,919

Lottery Sales: Q1 2026*

Month	Lottery Sales	% Change from 2025
January	\$353,680.00	0.7%
February	\$328,414.00	17.3%
March	\$324,623.00	-18.1%
Total	\$1,006,717.00	-2.0%

*The periods for which relevant sales are reported are based upon week-end totals, and may not correspond precisely to calendar month periods.

Lottery Sales: Year-Over-Year

Year	Quarter	Lottery Sales	% Change from Previous Year
2025	Q1	\$1,585,745.25	47.3%
	Q2	\$1,465,303.00	-0.1%
	Q3	\$949,657.50	-37.3%
	Q4	\$986,113.00	-32.5%
	Total	\$4,986,818.75	-9.7%
2026	Q1	\$1,006,717.00	-2.0%
	Q2	-	-
	Q3	-	-
	Q4	-	-
	Total (to date)	\$1,006,717.00	

Workforce

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Workforce Composition

Sector	Goal	Q1 % ¹	Q1 Total # of Employees	Q2 %	Q2 Total # of Employees	Q3 %	Q3 Total # of Employees	Q4 %	Q4 Total # of Employees
Minority	40%	75%	2,156						
Veteran	3%	2%	68						
Women	50%	45%	1,521						
Local/Host/Surrounding Community Resident ²	75%	87%	2,960						
MA Residents	-	92%	3,126						
Total Number of Employees ³			3,387						
Full-time			2,367						
Part-time			1,020						
On-call			0						

¹ All Q1 figures are as of April 1, 2026. The total number of employees that did not specify their minority status during Q1 was 517.

² Local/Host/Surrounding Community Residents” include residents from communities within thirty (30) miles of Encore Boston Harbor.

³ Please note that an employee may fall into more than one sector (e.g.: minority and local) and, as such, totals may not be reflective of the sum of previous columns.

Workforce Composition: Employees Supervisory & Above

	Minority	Women	Veteran	Total Head Count (including non-minority employees)
ALL EMPLOYEES				
Number of Employees	2,156	1,521	68	3,387
% Actual	75%	45%	2%	
MANAGER AND ABOVE				
Number of Employees	81	80	9	201
% Actual	43%	40%	4%	
SUPERVISORS AND ABOVE				
Number of Employees	308	233	16	571
% Actual	59%	41%	3%	

Operating Spend

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Operating Spend¹: Diversity

Diversity Category	Annual Goal	Q1 %	Q1 Spend	Q2 %	Q2 Spend	Q3 %	Q3 Spend	Q4 %	Q4 Spend
MBE Vendor Spend	8%	6%	\$1,264,882.77	-	-	-	-	-	-
VBE Vendor Spend	3%	0%	\$20,389.46	-	-	-	-	-	-
WBE Vendor Spend	14%	12%	\$2,477,114.74	-	-	-	-	-	-
Total Diverse Spend	25%	18%	\$3,762,386.97	-	-	-	-	-	-

¹ All spend figures referenced herein are based upon Encore Boston Harbor's Q1 discretionary spend amount of **\$20,174,009.87**.

Operating Spend: Local

Local Vendor Spend	Goal	Q1 %	Q1 \$	Q2 %	Q2 \$	Q3 %	Q3 \$	Q4 %	Q4 \$
Boston	\$20,000,000.00	11%	\$2,126,759.94	-	-	-	-	-	-
Chelsea	\$2,500,000.00	2%	\$327,250.13	-	-	-	-	-	-
Everett	\$10,000,000.00	7%	\$1,454,327.00	-	-	-	-	-	-
Malden	\$10,000,000.00	1%	\$108,208.76	-	-	-	-	-	-
Medford	\$10,000,000.00	1%	\$187,204.83	-	-	-	-	-	-
Somerville	\$10,000,000.00	5%	\$953,666.99	-	-	-	-	-	-
MA Vendor Spend	N/A	58%	\$11,731,427.24	-	-	-	-	-	-

Compliance

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Compliance: Minors¹ Prevented from Gaming²

Month	Minors Intercepted on Gaming Floor and Prevented from Gaming	Minors Intercepted Gaming	Minors Intercepted at Slot Machines	Minors Intercepted at Table Games	Minors Intercepted Consuming Alcohol	Number of IDs NOT Checked that Resulted in Minor on Gaming Floor	Number of Fake IDs Provided by Minors that Resulted in Minor on Gaming Floor	Numbers of Minors on Gaming Floor Under 18 Years of Age
January	3	3	1	1	4	0	0	0
February	0	0	0	0	0	0	0	0
March	2	0	0	0	0	0	0	0
Total	5	3	1	1	4	0	0	0

1 A “minor” is defined as a person under 21 years of age, provided however, that the last column of the above specifically refers to persons under 18 years of age.

2 Please note that no minors were intercepted or found to be engaged in any sports wagering during Q1.

- The average length of time spent by a minor on the casino floor was 41 minutes 52 seconds.
- The longest length of time spent by a minor on the casino floor was 6 hours 45 minutes.
- The shortest length of time spent by a minor on the casino floor was 1 minute 38 seconds.

People & Culture Initiatives

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Forbes Celebration

In February, EBH celebrated receiving its Forbes 5 Star rating for 2026! Employees were treated to a specialty menu in Le Staff, live raffle drawings, and surprise activations.



Star and All-Star of the Year Announcement



Promotions, Marketing, Special Events & Volunteerism

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Community Relations Q1 Highlights

Volunteer Hours

591+ volunteer hours were logged for Q1, and 2025 achievements were celebrated at Volunteer Appreciation Breakfast

Wynn Resorts Foundation Scholarship
Applications were accepted through the end of Q1

Donations

\$400,000+ was distributed to 17 nonprofits in the Greater Boston area from the Wynn Resorts Foundation Community Grant Fund

Valentine's Day Floral Sale

\$8,090 was raised for the Wynn Resorts Foundation Community Grant Fund from the Valentine's Day Floral Sale with the corporate match



TRU Contributions: Q1 2026

Charitable Organization	Dollar Amount	Number of Tickets
Everett Citizens Foundation	\$8,068.33	62,982
Massachusetts Fallen Heroes	\$25,936.57	109,345
MSPCA-Angell	\$25,758.64	108,024
Wynn Resorts Foundation	\$9,329.57	66,062
Total	\$69,093.11	346,413



Questions?



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

FROM: Justin Stempeck, Chief Deputy General Counsel
Alexandra Lightbown, Director of Racing
Tom Lam, Compliance and Operations Manager

DATE: May 11, 2026

RE: Caesars Request for Racebook Integration

I. Introduction

This matter comes before the Commission per the request of American Wagering Inc. d/b/a Caesars Sportsbook (“Caesars”) to integrate the NYRABets (“NYRA”) Racebook application into the Caesars Sportsbook mobile app and website. See Caesars letter (attached).

II. Background

Caesars currently offers a racebook application operated by NYRA and partners with NYRA for marketing and branding purposes. NYRA has been authorized as an advance deposit wagering provider since 2016 in Massachusetts.

The proposed integration will utilize Caesar’s approved sportsbook technology to perform Know Your Customer (“KYC”) checks for patrons and to certify compliance with all geolocation requirements. The integration will additionally use a single wallet for the patrons across both sportsbook and racebook. Credit wagers will be prohibited and all history and transactions for both sports wagers and racing wagers will be tracked. Additionally, all responsible gaming options will be available through the integrated product and apply to both sports and racing. Finally, the age limit to access any aspect of the platform will be 21+.

Caesars confirmed that this integration launched in April 2025 and has now been approved in 10 other states including: KY, NY, CO, OH, VA, IL, IN, WY, MD and WV.

III. Recommendation

After review of the proposed integration and discussion with Caesars, the Racing, Legal and Sports Wagering Divisions recommend that the Commission approve this request.



Massachusetts Gaming Commission

CAESARS[®] SPORTSBOOK

May 8, 2026

Via Email only

Carrie Torrisi
Chief of Sports Wagering Division
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

RE: American Wagering, Inc. (Caesars Sportsbook)
Request for Racebook integration

Dear Chief Torrisi,

On behalf of American Wagering, Inc. (Caesars Sportsbook), please accept this letter as a formal request for approval to integrate the NYRABets (NYRA) Racebook application, that is developed and operated by NYRA, into the Caesars Sportsbook mobile app and website. As previously shared with the Commission, Caesars currently offers a Racebook application operated by NYRA and we partner with them for marketing and branding purposes. We are seeking approval to integrate the Racebook application as an interface into the Caesars Sportsbook mobile app and website available through a link to NYRA.

Listed below is an overview of the changes that we reviewed with Commission staff and would be implemented as part of the integration.

- KYC and Geolocation Checks
Caesars will leverage the existing MGC approved sportsbook technology to perform KYC checks for patrons. Additionally, when clicking the Racebook link, a check would be made to ensure that the patron's registered home address and their current location are within a Racebook jurisdiction before allowing them to place wagers. The geolocation checks for sports wagering will remain unchanged and will follow all requirements of the Federal Wire Act.
- Single Account/Wallet
With the Single Account/Wallet that will be deployed as part of our Caesars Player Account Management (PAM), currently pending MGC approval, this will allow patrons to manage their funds from a single account. All history and transactions will be tracked for both race and sports within the account. Wagering with credit card funds will not be permitted.

Telephone
702-754-1800

Address
Caesars Sportsbook
6325 South Rainbow Blvd.
Ste. 100
Las Vegas, NV 89118

CAESARS[®] SPORTSBOOK

- Responsible Gaming
For race and sports, the patron will be able to access the responsible gaming options that are available through the Caesars PAM. Any limits set will apply to both sports and race.
- Financial Reporting
The financial reports will continue to detail the same information that is currently provided for sports. When the racebook is linked to the Caesars Sportsbook apps / website, the Caesars financial reports will delineate between sports and racebook for proper revenue reporting.

Additionally, please find attached presentation deck for the public meeting materials.

We believe this integration will provide patrons an enhanced experience as it will allow users to place wagers on horse racing events within the integrated platform and utilize funds via single-wallet functionality.

We appreciate the staff's time on reviewing this matter. Please let us know of any additional questions or information needed. I can be reached at 725-204-4565 or lrankin@caesars.com.

Sincerely,

Lisa Rankin

Lisa Rankin
Vice President Compliance & Licensing

Telephone
702-754-1800

Address
Caesars Sportsbook
6325 South Rainbow Blvd.
Ste. 100
Las Vegas, NV 89118



CAESARS[®]
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RACEBOOK

Racebook Integration with Caesars Sportsbook

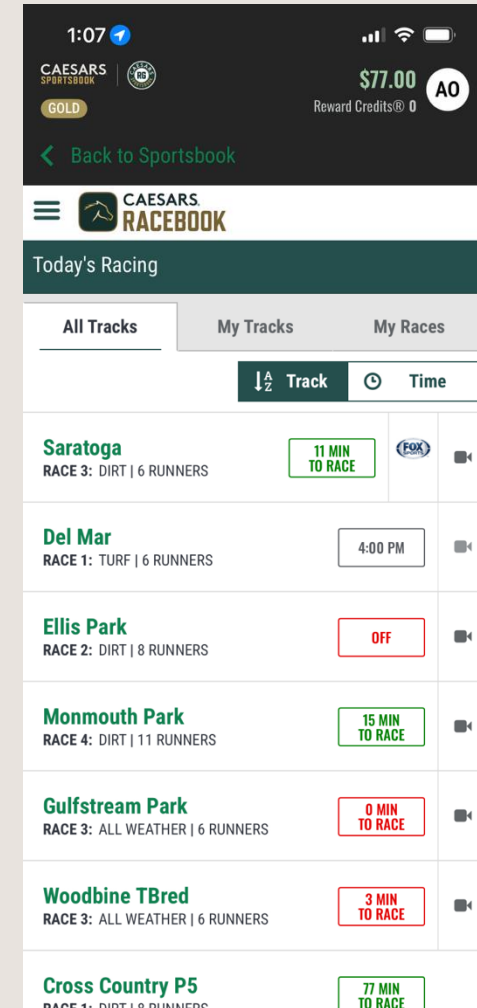
Caesars Entertainment



Racebook Standalone to Integration with Sportsbook

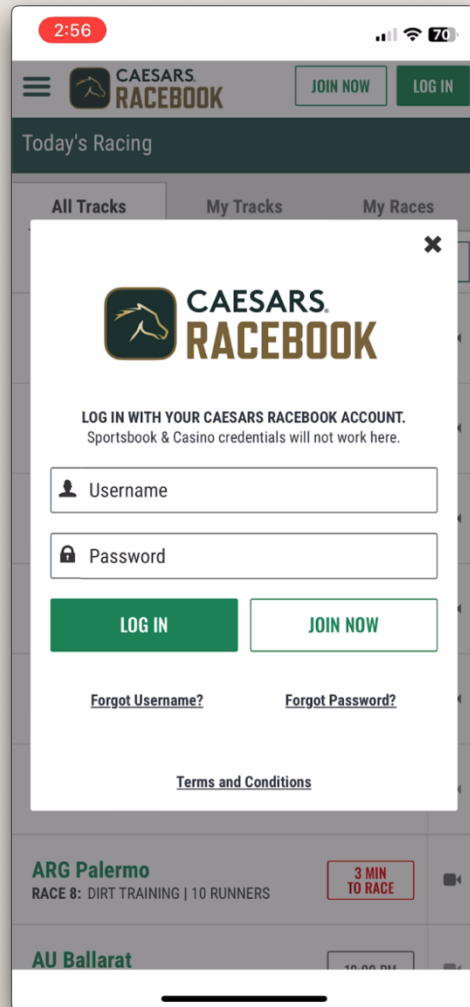
Racebook on the Caesars Sportsbook

- Integrate NYRA Bets Racebook via interface on Caesars Sportsbook website and mobile app.
- Provide single interface for player to wager on sports and racing.
- Same payment options for racing as currently available on Sports.
- Shared Wallet for sports and Racing with Global Transfer between States

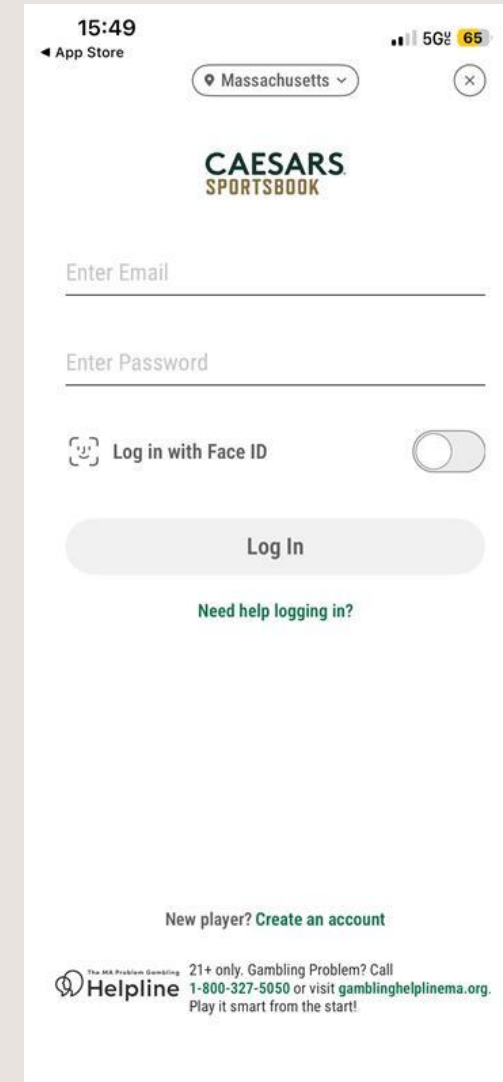


Single Racebook and Sportsbook Account

Standalone Racebook

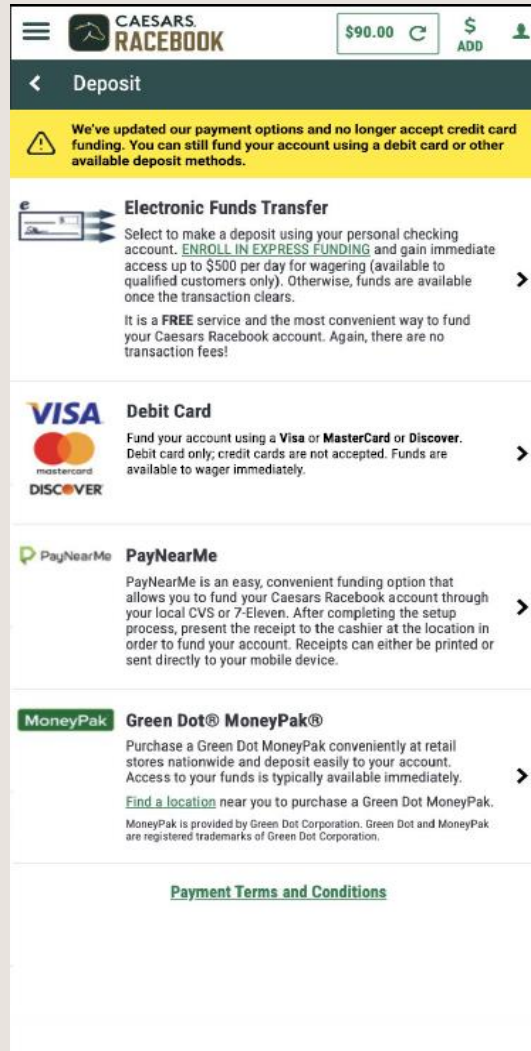


Racebook Integration

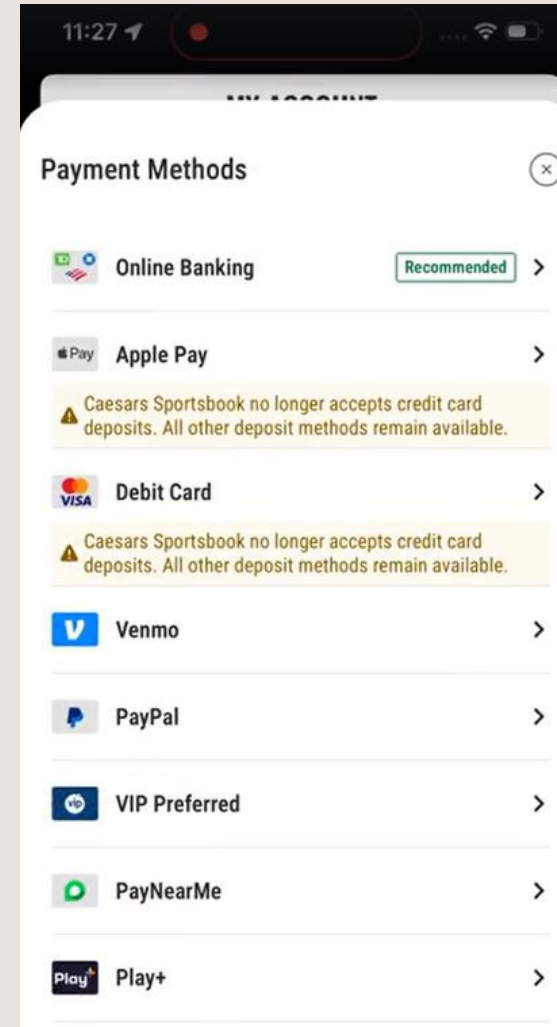


Mobile Application / Website - Changes

Standalone Racebook



Racebook Integration



Identical Betting Experience

Standalone Racebook

The standalone app interface shows a balance of \$15.00 and a 'Today's Racing' section with tabs for 'All Tracks', 'My Tracks', and 'My Races'. A list of races is displayed with their respective times and status.

Track	Race	Runners	Status
Saratoga	RACE 3: DIRT	6 RUNNERS	11 MIN TO RACE
Del Mar	RACE 1: TURF	6 RUNNERS	4:00 PM
Ellis Park	RACE 2: DIRT	8 RUNNERS	OFF
Monmouth Park	RACE 4: DIRT	11 RUNNERS	15 MIN TO RACE
Gulfstream Park	RACE 3: ALL WEATHER	6 RUNNERS	0 MIN TO RACE
Woodbine TBred	RACE 3: ALL WEATHER	6 RUNNERS	3 MIN TO RACE
Cross Country P5	RACE 1: DIRT	8 RUNNERS	77 MIN TO RACE
ARG Palermo			0 MIN

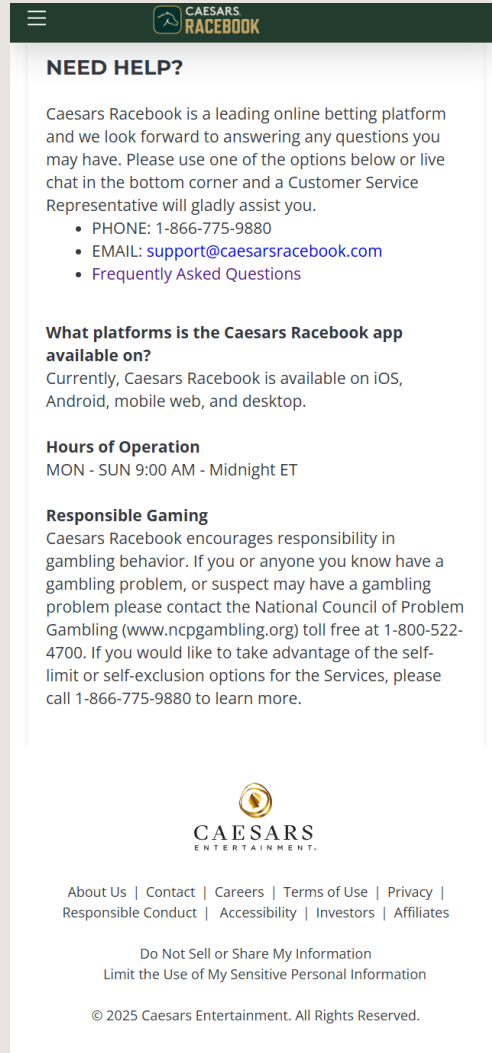
Racebook Integration

The integrated app interface shows a balance of \$77.00 and a 'Today's Racing' section with tabs for 'All Tracks', 'My Tracks', and 'My Races'. A list of races is displayed with their respective times and status.

Track	Race	Runners	Status
Saratoga	RACE 3: DIRT	6 RUNNERS	11 MIN TO RACE
Del Mar	RACE 1: TURF	6 RUNNERS	4:00 PM
Ellis Park	RACE 2: DIRT	8 RUNNERS	OFF
Monmouth Park	RACE 4: DIRT	11 RUNNERS	15 MIN TO RACE
Gulfstream Park	RACE 3: ALL WEATHER	6 RUNNERS	0 MIN TO RACE
Woodbine TBred	RACE 3: ALL WEATHER	6 RUNNERS	3 MIN TO RACE
Cross Country P5	RACE 1: DIRT	8 RUNNERS	77 MIN TO RACE

Enhanced RG Options

Standalone Racebook



NEED HELP?

Caesars Racebook is a leading online betting platform and we look forward to answering any questions you may have. Please use one of the options below or live chat in the bottom corner and a Customer Service Representative will gladly assist you.

- PHONE: 1-866-775-9880
- EMAIL: support@caesarsracebook.com
- [Frequently Asked Questions](#)


What platforms is the Caesars Racebook app available on?

Currently, Caesars Racebook is available on iOS, Android, mobile web, and desktop.

Hours of Operation
MON - SUN 9:00 AM - Midnight ET

Responsible Gaming

Caesars Racebook encourages responsibility in gambling behavior. If you or anyone you know have a gambling problem, or suspect may have a gambling problem please contact the National Council of Problem Gambling (www.ncpgambling.org) toll free at 1-800-522-4700. If you would like to take advantage of the self-limit or self-exclusion options for the Services, please call 1-866-775-9880 to learn more.

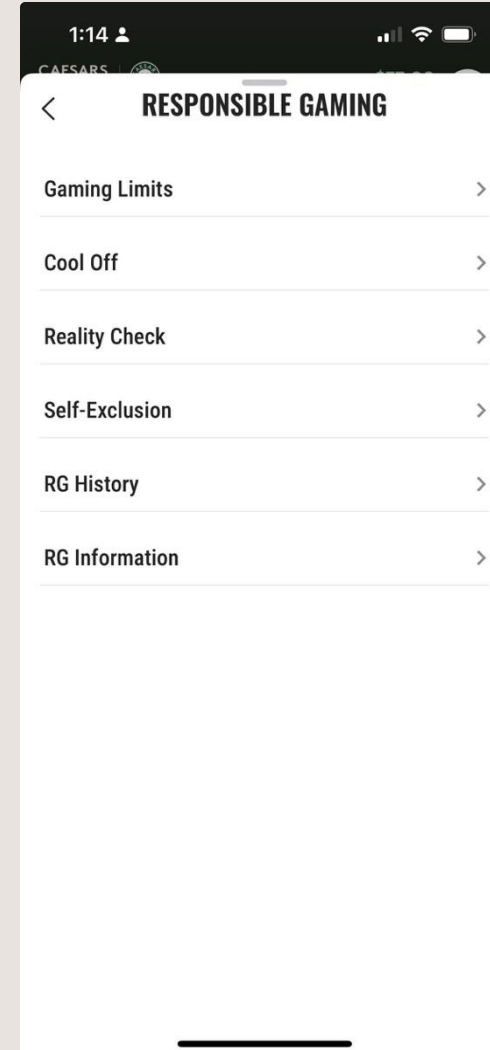

CAESARS
ENTERTAINMENT

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Do Not Sell or Share My Information
Limit the Use of My Sensitive Personal Information

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Racebook Integration



1:14

CAESARS

RESPONSIBLE GAMING

- [Gaming Limits](#)
- [Cool Off](#)
- [Reality Check](#)
- [Self-Exclusion](#)
- [RG History](#)
- [RG Information](#)

Certifications & Regulatory Approvals

Regulatory

Certified Against GLI Standards in multiple jurisdictions

Financial Balance Reporting Provided by Caesars

NYRA continues to supply reports for Division of Racing

Responsible Gaming & Self Exclusion now Self Service

Player

Single Interface for Racing and Sports

Single Account and Wallet for all on patrons on Caesars PAM

Single Player Registration / Authentication and KYC Process

Technical

Existing regulated components & backend services

Integrating current racebook logic via a window into sportsbook

Increased options for payments for the patron experience

Patron Protection & Regulatory Compliance

Player Protections

- Responsible Gaming
 - Limits, Transactions, and Exclusions are accessible for all patrons
 - Age Restriction for 21+ across Sports and Racing
- Terms & Conditions and Internal Controls
 - Updates to Terms of Service to Outline Integration with NYRA
 - No changes to Internal Controls
- Customer Service
 - Racebook players will have access to Caesars Digital Support Systems

Regulatory Coverage

- Reporting Consistency
 - Existing Reports provided by NYRA Bets will continue
 - Caesars will update PAS to track funds for racing.
- Regulated Payment Methods
 - Restrictions in place to prevent wagering using funds from Credit Cards
- Tax Reporting
 - The tax reporting will continue to be supported by NYRA Bets for tax reportable wins on race wagers.



Regulatory Approvals

- First Launched in April 2025 – Approved in ten jurisdictions.

Kentucky



New York



Colorado



Ohio



Virginia



Illinois



Indiana



Wyoming



Maryland



West Virginia





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

FROM: Justin Stempeck, Chief Deputy General Counsel
Alexandra Lightbown, Director of Racing
Tom Lam, Compliance and Operations Manager

DATE: May 13, 2026

RE: DraftKings Related Racing Requests

I. Introduction

This matter comes before the Commission per two requests related to DraftKings racing operations:

1. The first request comes from Sterling Suffolk Racecourse, LLC (“Suffolk”) asking that DraftKings Racing be approved as an ADW provider.
2. The second request comes from DraftKings and asks that its racebook (previously named DK Horse) be integrated into its sportsbook as “DraftKings Racing.”

II. Background

DraftKings has historically offered racing through a white label partnership with Twin Spires since 2023. DraftKings recently obtained a hub license to function as an ADW provider from the state of Oregon. As part of obtaining that license, DraftKings has been migrating its existing racing operations onto its own platform and is currently live with its DraftKings Racing product across nine states (DE, RI, NM, FL, OH, OR, LA, NH & MT).

DraftKings is interested in functioning as an ADW provider under its own Oregon hub license¹ and using much of its own technology through its relationship with Suffolk and via the request submitted by Suffolk and attached hereto.

DraftKings further asks that the Commission approve the integration of its new racebook product into its sportsbook. DraftKings will continue to maintain its relationship with United Tote to handle all wager settlement on its behalf.

The proposed integration will utilize DraftKings approved sportsbook technology to perform Know Your Customer (“KYC”) checks for patrons and to certify compliance with all geolocation requirements. The

¹ An Oregon Hub license is necessary to function as an ADW provider across the United States.



Massachusetts Gaming Commission

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

integration will additionally show a shared balance for the patrons across both sportsbook and racebook but the backend will maintain separate ledgers. Credit wagers will be prohibited and all history and transactions for both sports wagers and racing wagers will be tracked. If a patron has credit card funds in their racebook account they will have those funds locked upon migration to the DraftKings Racing product and the only option will be to withdraw those funds.

Additionally, responsible gaming tools will be available for the new racing product although wagering limits will not be in effect immediately. DraftKings' tote provider will continue to send reporting to Suffolk for tax purposes.

The age limit on the combined sportsbook/racebook product will be 21+. Patrons accessing solely DraftKings Racing via the website will have access at 18+ but will have no access to any aspect of the sportsbook from that website. No marketing will be directed at patrons younger than 21.

III. Recommendation

After review of both the request from Suffolk to add DraftKings Racing as an approved ADW provider and the request from DraftKings to integrate their sportsbook and racebook, the Racing, Legal and Sports Wagering Divisions recommend that the Commission approve both requests.



Massachusetts Gaming Commission



May 14, 2026

VIA EMAIL

Mr. Tom Lam
Compliance & Operations Manager, Sports Wagering Division
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, Massachusetts 02110

RE: DraftKings Racing

Dear Mr. Lam:

DraftKings is seeking approval to offer advance-deposit wagering in Massachusetts through its DraftKings Racing offering. Once live, eligible customers will be able to access DraftKings Racing through both the DraftKings Sportsbook app and the DraftKings website. This letter addresses questions posed by Massachusetts Gaming Commission (“MGC”) staff regarding certain parameters and aspects of the offering.

Know Your Customer (KYC) and Geolocation Procedures

DraftKings Racing will follow the same KYC procedures as DraftKings Sportsbook for account creation and identity verification. DraftKings will also verify a customer's state of residence to confirm eligibility to wager on DraftKings Racing.

Age Restriction Controls

Massachusetts customers must be at least 21 years of age to wager on DraftKings Sportsbook and at least 18 years of age to wager on DraftKings Racing. At launch, Massachusetts customers aged 18-20 will not be able to wager on DraftKings Racing if they attempt to access it through the DraftKings Sportsbook app. DraftKings does not plan to market DraftKings Racing to Massachusetts customers under 21.

Deposit and Funding Methods

DraftKings Racing will follow the same approved funding mechanisms as DraftKings Sportsbook, including prohibiting the use of credit cards as a funding source. Migrated DK Horse customer balances that were originally funded by credit card will not be playable on DraftKings Racing or DraftKings Sportsbook in Massachusetts and will be limited to withdrawal only.



Funds Availability

Customers will see a single account balance, reflecting funds available to wager on DraftKings Racing and DraftKings Sportsbook (provided the customer is at least 21 years of age). DraftKings maintains separate ledgers for DraftKings Racing and DraftKings Sportsbook to facilitate reporting, recordkeeping, and payment of tax obligations.

Availability of Responsible Gaming Tools

DraftKings Racing customers will have access to the responsible gaming tools and resources available in the DraftKings Responsible Gaming Center. Wager limit functionality will not be available to DraftKings Racing customers at launch. DraftKings is evaluating the work required to implement this feature for Racing, but there is no estimated timeline for its availability at this time.

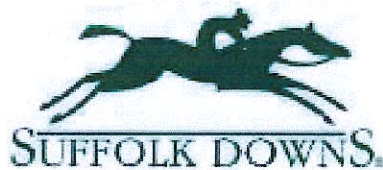
Tax Reporting Process

Consistent with prior practice, Churchill Downs Inc. / United Tote will continue to send required reports to Suffolk Downs for DraftKings Racing activity. Tax and liability reporting for DraftKings Sportsbook and DraftKings Racing will be provided separately to the relevant parties at the MGC.

Should you have any additional questions, please do not hesitate to reach out. We would like to reiterate that DraftKings looks forward to the opportunity, with the Commission's approval, to offer DraftKings Racing to residents of the Commonwealth.

Regards,

DraftKings Inc.



May 14, 2026

Via Email

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

Re: Suffolk Downs's Request for Approval of DraftKings Racing as an ADW Provider

Dear Dr. Lightbown:

Sterling Suffolk Racecourse, LLC ("Suffolk Downs") requests, in accordance with 205 CMR 6.20, that the Massachusetts Gaming Commission approve DK Horse, LLC, doing business as DraftKings Racing, as an ADW provider conducting ADW operations on its own platform.

DK Horse is a subsidiary of Draft Kings. The Commission previously approved DK Horse as an ADW provider for Suffolk Downs in 2023, and it has reapproved DK Horse each year since then. To date, the company has been operating under the DK Horse app as a white label of Churchill Downs Technology Initiatives Company (CDTIC), which operates the Twin Spires ADW platform that has been an approved ADW vendor in the Commonwealth for many years. We understand that, with the launch of DraftKings Racing, the company will be operating substantially on its own platform, rather than relying exclusively on the CDTIC infrastructure. DraftKings Racing will do its own account creation, know-your-customer, account funding, wagering mechanisms, and customer service operations. DraftKings Racing will continue to have a relationship with CDTIC for tote services and settlements with racetracks.

Suffolk Downs also requests that the Commission approve the request to have DraftKings Racing accessible through the DraftKings Sportsbook mobile application. We understand that DraftKings has provided information and presented to you and others on the Commission's staff concerning the linking of the two platforms.

As of now, DraftKings Racing has been approved in Oregon, Montana, Delaware, Rhode Island, New Mexico, Florida, Ohio, Louisiana and New Hampshire, and it has approval requests pending in several other jurisdictions.

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

Sincerely,


Michael Buckley
Chief Operating Officer



DraftKings Racing 2026 Mass Gaming Overview



DraftKings Horse Racing Overview



DK Horse - Origin

- Operating via established white label partnership since 2023



Strategic Partnership with Churchill Downs Inc. (CDI)

- 10 year agreement which provides access to United Tote for wagering services
- Ongoing content and racing data agreements to support full offering



Granted Hub License from Oregon (March 2026)

- Enables DraftKings to operate our Racing Product: **DraftKings Racing**



State Migrations Underway

- Currently live across 9 States: DE, RI, NM, FL, OH, OR, LA, NH, & MT

DraftKings Racing - Key Topics

KYC & Geolocation Procedures

- Will follow Sportsbook procedures and apply applicable residency rules for horse racing.

Age Restriction Controls

- 21+ in Sportsbook
- 18+ on Web
- No marketing to 18-20 year olds

Funds Treatment

- One customer facing balance
- Separate ledgers on the back-end for Sportsbook and Racing

Deposit & Funding Methods

- Will follow sportsbook funding methods (i.e. no credit cards)

RG Tools (OSB & Racing)

- Will be in line with other DraftKings products, but wager limits not available immediately

Tax Reporting Separation

- CDI will continue to send reports to Suffolk Downs as has been customary
- Sportsbook and Racing liability reporting will be separate

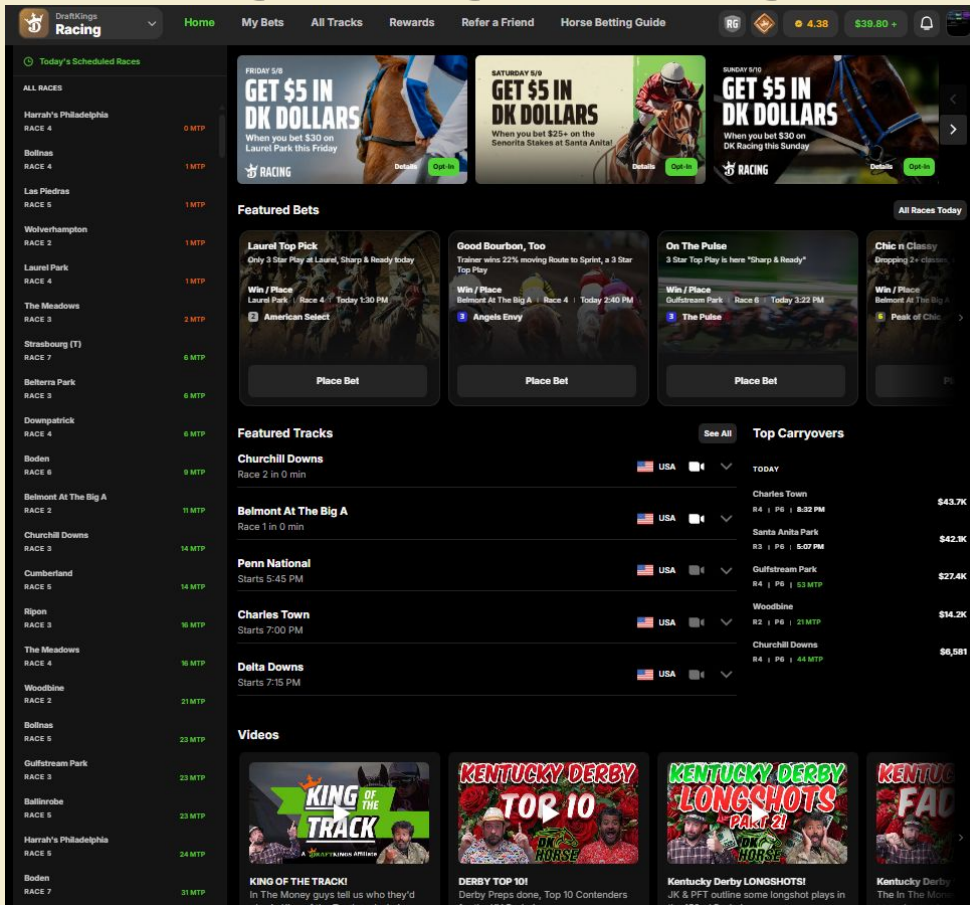


DraftKings Racing

Demo



DraftKings Racing - Homepage



The screenshot shows the DraftKings Racing homepage with a dark theme. At the top, there's a navigation bar with 'DraftKings Racing' logo, 'Home', 'My Bets', 'All Tracks', 'Rewards', 'Refer a Friend', and 'Horse Betting Guide'. A user's balance of \$4.38 and a total of \$39.80 are displayed. Below the navigation, there are three promotional banners for 'GET \$5 IN DK DOLLARS' for Friday, Saturday, and Sunday. The main content area is divided into 'Featured Bets' and 'Featured Tracks'. 'Featured Bets' includes cards for 'Laurel Top Pick', 'Good Bourbon, Too', 'On The Pulse', and 'Chic n' Classy'. 'Featured Tracks' lists 'Churchill Downs', 'Belmont At The Big A', 'Penn National', 'Charles Town', and 'Delta Downs'. A 'Top Carryovers' section shows a table of upcoming races with their respective times and odds. At the bottom, there's a 'Videos' section with four video thumbnails: 'KING OF THE TRACK', 'DERBY TOP 10!', 'KENTUCKY DERBY LONGSHOTS!', and 'KENTUCKY DERBY FAO'.

Homepage

- Promotions
- Featured bets
- Featured tracks
- Top carryovers
- Videos
- Education
- And more...

Accessible through racing.draftkings.com (18+) and the DraftKings Sportsbook & Casino native application (21+)

DraftKings Racing - Tracks Page



The screenshot shows the DraftKings Racing Tracks Page. At the top, there is a navigation bar with the DraftKings Racing logo, a dropdown menu, and links for Home, My Bets, All Tracks (highlighted in green), Rewards, Refer a Friend, and Horse Betting Guide. On the right side of the navigation bar, there are icons for RG, a diamond icon, a balance of 4.38, a balance of \$39.80 with a plus sign, a notification bell, and a profile icon.

Below the navigation bar is a search bar with the placeholder text "Search track name..." and a filter icon. The main content area displays a list of tracks, each with a header, a race time, and a list of race cards. The tracks listed are:

- Ballinrobe** (IRE): Race 4 in 0 min. Race cards: R1 (Final, Results), R2 (Final, Results), R3 (Final, Results), R4 (Off, Watch), R5 (19 MTP, Bet Now), R6 (49 MTP, Bet Now), R7 (2:52 PM, Bet Now), R8 (3:22 PM, Bet Now).
- Cumberland** (USA): Race 4 in 0 min.
- Harrah's Philadelphia** (USA): Race 4 in 0 min.
- Las Piedras** (URU): Race 5 in 0 min.
- Laurel Park** (USA): Race 4 in 0 min.
- The Meadows** (USA): Race 3 in 0 min.
- Bollnas** (SWE): Race 4 in 0 min.
- Wolverhampton** (ENG): Race 2 in 0 min.
- Strasbourg (T)** (FR): Race 7 in 2 min.
- Belterra Park** (USA): Race 7 in 2 min.

Tracks Page

Search, sort, and filter through today's track offering

DraftKings Racing - Race Page



Churchill Downs
May 8, 2025

Race 2 (Final) | **Race 3 (8 MTP, 36 MTP)** | Race 4 (36 MTP) | Race 5 (2:45 PM) | Race 6 (3:18 PM) | Race 7 (3:50 PM) | Race 8 (4:22 PM) | Race 9 (4:55 PM)

Race 3 In 8 Min
7 F | Dirt | Fast | CLM | \$37K

My Bets | **Win / Place / Show** | Exacta | Trifecta | Superfecta | Hi-Five | Daily Double | Pick 3 | Pick 5

SELECT ALL | All | All | All

Runner	Jockey	Trainer	Sex	Age	Weight	ML
1 Livehappy	B. Hernandez, Jr.	J. Radosevich	S	3	118	5 ML: 8
2 Odorico	L. Machado	E. Caramori	S	3	118	22 ML: 15
3 You Belong Here	J. Loveberry	W. Catalano	S	3	118	7/2 ML: 6
4 Catamount	D. Sheehy	A. Meah	S	3	118	19 ML: 15
5 Gallo De Fuego	L. Saez	J. Gallegos	S	3	118	2 ML: 4
6 Aerate	I. Ortiz, Jr.	S. Asmussen	S	3	118	9/2 ML: 3
7 Mister Banderas	J. Ortiz	K. Larose	S	3	118	5/2 ML: 6/5

Race Page

- See runners
- Build bets
- Watch livestreams and replays
- See runner stats
- See pools, probables, will pays, and changes
- View bets placed on that race
- Switch between other races at that track

DraftKings Racing - My Bets



My Bets

- All
- Open
- Settled
- Won
- Lost

1 Girfromouterspace Win Canceled
Wager: \$2.00 | Refunded: \$2.00
Parx Racing
R1 Result: 4, 3, 6, 1, 2
Bet ID: DK6381759567609333 | Placed: Apr 14, 2026, 6:24 AM

2 Ducale Win Won
Wager: \$5.00 | Paid: \$26.00
Parx Racing
R10 Result: 2, 7, 6, 5, 1
THE CROWN IS YOURS
Bet ID: DK639106733927737486 | Placed: Apr 1, 2026, 4:49 PM

1 Camelarua Win Canceled
Wager: \$2.00 | Refunded: \$2.00
Fontainebleau
R4 Result: 11, 4, 3, 2, 1
Bet ID: DK639105611446140488 | Placed: Mar 31, 2026, 6:39 AM

My Bets

See pending wagers and results of bets, including winnings. Cancel bets before race starts, subject to cancellation rules designed to protect tote integrity



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
Tom Lam, Compliance and Operations Manager
Cristian Taveras, Gaming Technical Compliance Manager
Kevin Gauvreau, Acting Director of IT Services

Date: May 7, 2026

Re: DraftKings Request to Approve Alternate Methods of KYC for ID Scan with Selfie, and Manual Review 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

DraftKings uses a previously approved method that consists of personally identifiable information (PII) verification, device authentication, and KBA questions. DraftKings is requesting approval of two alternate methods: (1) ID scan with selfie verification; and (2) manual review. DraftKings uses ID scan with selfie as an alternate method within a waterfall approach or in the first instance depending on the circumstances. Adding these two alternate methods to their KYC model will consist of PII verification, device authentication, KBA questions, ID scan with selfie, and a manual review.

The Sports Wagering Division and the Gaming Technical Compliance team recommend that the Commission approve DraftKings alternate methods of KYC pursuant to 205 CMR 248.04(4).

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



Sports Wagering Division

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

FROM: David Harrison – Compliance Officer II

MEMO: 05/12/2026
MEETING: 05/21/2026

RE: Update to Penn Sports Interactive 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:

Penn Sports Interactive (“PSI”) has requested changes to their Massachusetts online sportsbook house rules. A full detailed summary of changes can be found in the attached redline exhibit.

The summary of changes is as follows:

1. **General Rules:** Slight settlement clarification on Draft markets settlement and addition of Hypothetical matchups.
2. **Baseball:** Clarifications to player props rules by clarifying criteria for “participation” for pitchers and position players; provided clarification for player participation for player prop wagers for the MLB all star game
3. **Football:** Added clarification for Team Drive Markets, that an offensive drive ends immediately upon a turnover.
4. **Golf:** Added settlement clarification for incomplete events. Added settlement clarification for winning score, winning margin, round leader, round top x finish, to



Sports Wagering Division

make/miss cut, player number of birdies/pars/bogies in a round and player round score.

CONCLUDING STATEMENT:

These updates aim to standardize grading, reduce ambiguities, and align with industry best practices, potentially minimizing disputes. The Sports Wagering Division confirms all requirements have been met under 205 CMR 247.02 and recommends approving these changes.

25.29	Draft markets:
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House Rules – Massachusetts



Effective Date: [February 26, 2026](#)TBD

	<p>Unless otherwise specified, all draft markets are considered action. All draft markets will be graded <u>at the time of the draft when the pick is announced</u>. Any trades occurring after the draft will not be considered for grading purposes.</p>
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<p>25.34</p>	<p><u>Hypothetical Matchups:</u></p> <p><u>Markets will sometimes be posted for games or series that have not yet been determined and finalized, including potential playoff games/series and Championship matchups. In the event these games/series do not take place due to one or both teams being eliminated, or the game/series is not played in that season for any reason, all bets on the event will be deemed no action and refunded.</u></p>
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<p>BS.6.6</p>	<p><u>Player Prop wagers will be deemed to have participated in an event if: The starting pitcher must throw the first pitch for their team. If a player is a position player or designated hitter, they must be in the official starting line-up and make at least 1 plate appearance. Intentional Walk is considered a plate appearance.</u></p> <p><u>MLB All-Star Game Only: Player Prop wagers will be deemed to have participated in the event if: A pitcher records at least 1 pitch for their team. If a player is a position player or designated hitter, they must make at least 1 plate appearance. Intentional Walk is considered a plate appearance. All bets will be graded on 9-inning play only, with the exception of moneyline bets, which will include any potential tiebreaker.</u>Player Prop wagers will be deemed to have participated in an event if: The starting pitcher must throw the first pitch for their team. If a player is a position player or designated hitter, they must be in the official starting line-up and make at least 1 plate appearance.</p> <p><u>MLB All-Star Game Only: Player Prop wagers will be deemed to have participated in the event if: A pitcher records at least 1 pitch for their team. If a player is a position player or designated hitter, they must make at least 1 plate appearance. All bets will be graded on 9-inning play only, with the exception of moneyline bets, which will include any potential tiebreaker.</u></p>
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In-play	
FO.7.1	<p>Team Drive Markets:</p> <p>Team Drives are deemed to have started on the first offensive snap of the ball. Any drives which are completed due to the end of the half or game and do not explicitly result in one of the outcomes listed will be void. [Excluding Team Offensive Drive <u>To</u> Score Yes/No]</p> <p><u>An Offensive Drive ends immediately upon a turnover.</u></p> <p>Team Offensive Drive <u>To</u> Score Yes/No: All bets stand. For all incomplete drives due to clock running out, "No" is the winning selection.</p> <p>Field Goal Attempt is deemed the winning selection if the kicker kicks the ball. Blocked, scored, missed, or returned field goals will all be graded as "Field Goal Attempt." Botched/fake field goals are not considered a field goal attempt.</p> <p>Punt is deemed the winner if the punter kicks the ball. All punts returned for a touchdown will be graded as "Punt."</p> <p>Blocked and muffed returns will be graded as "Punt," and a new drive will begin with the next snap of the ball.</p> <p>If the punt is blocked and results in <u>a safety</u>, the market will be graded as "Punt."</p> <p>When a blocked punt or field goal results in a touchdown, the markets will result based on the conclusion of the offensive team's drive (i.e., punt or field goal, in these examples).</p>

Incomplete events	
GF.2.1	<p><u>If a tournament is reduced from the scheduled number of holes, wagers on outright markets will be graded according to the official result. Under these conditions, any wagers accepted on a golfer after their officially counted final shot is played will be deemed no action and refunded.</u>If a tournament is reduced from the scheduled number of holes, wagers on the outright market will be graded according to the official result. Any wagers accepted after the final shot is played will be deemed no action and voided.</p>
GF.4.4	<p><u>If a tournament is shortened and some holes are played which do not contribute to the final result, all wagers placed after the last official shot (that does contribute to the final result) will be deemed no action and refunded, except for wagers on markets which have already been determined.</u>If a tournament is shortened and some holes are played which do not contribute to the final result, all wagers placed after the last official shot will be deemed no action and void, except for wagers on markets which have already been determined.</p>

GF.5.18	<p><u>Winning Score:</u></p> <p>Graded on official winning score. Should the tournament be reduced from the scheduled number of holes, then all wagers on the market will be deemed no action and refunded.</p>
GF.5.19	<p><u>Winning Margin:</u></p> <p>Graded based on the difference between the winning score and that of the player finishing in 2nd place following completion of regulation play. Includes a playoff option. Should the tournament be reduced from the scheduled number of holes, then all wagers on the market will be deemed as no action and refunded.</p>
GF.5.20	<p><u>Round Leader:</u></p> <p>Graded based on the player who leads the Official Tournament Leaderboard following the completion of the specified round. Dead Heat Rules apply. Bets will be deemed no action and refunded if the round is not completed.</p>
GF.5.21	<p><u>Round Top X Finish:</u></p> <p>Graded based on the Official Tournament Leaderboard position following the completion of the specified round. Dead Heat Rules apply. Bets will be deemed no action and refunded if the round is not completed.</p>
GF.5.22	<p><u>To Make/Miss Cut:</u></p> <p>A Tournament Cut must be in place for Bets to stand and applies to the 1st official Cut.</p>
GF.5.23	<p><u>Player Number of Birdies/Pars/Bogeys in the Round:</u></p> <p>Graded on official tournament statistics. If a player does not complete the round, bets will be deemed no action and refunded unless the outcome of the market is already determined.</p>
GF.5.24	<p><u>Player Round Score:</u></p>

House Rules – Massachusetts



Effective Date: February 26, 2026TBD

<p>All bets will be deemed no action and refunded if the named player does not complete the round unless settlement has already been determined.</p>
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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: 5/15/2026 **MEETING DATE:** 5/21/2026

RE: Update to Bally Bet 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:

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

The summary of changes is as follows:

1. **Wager Void Policy:** Outlined additional circumstances in which a bet would qualify to be voided.
2. **Cashout Eligibility:** Added language to advise patrons that cashout functionality is not eligible for bonus bet wagers.
3. **Result Settlement:** Revised language to clarify when a bet is voided if an event is rescheduled. Added language to outline the calculations when dead heat rules apply.
4. **Football:** Clarification language added regarding the settlement of drive markets and certain NCAA match circumstances.
5. **Racket Sports:** Section title renamed for clarity.
6. **MMA:** Added applicable outcome descriptions for 5 different bout scenarios.



Sports Wagering Division

7. **Snooker:** Revised settlement language in cases of a re-rack and for offers combining multiple occurrences by a specific player/team within an event.

CONCLUDING STATEMENT:

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

Exhibit

Revisions:

6. CANCELLING (VOIDING OF BETS)

- (a) Bally's reserves the right, to declare a bet void, totally or partially, if any of the following, or similar, circumstances have occurred:
- i. ~~Bets have been offered with incorrect criteria resulting in ambiguous offers or invalid settlement (e.g., Match Odds being offered with "Yes/No" options);~~
 - ii. ~~Bally's ceases offering its services in a specific jurisdiction and the bet has been placed in such jurisdiction.~~

1. COMMON TERMS OF REFERENCE

- (a) The Cash Out function allows the Account Holder the possibility to redeem a bet, which status has not been settled yet, at its current value. It is available on selected events both in pre-match and live, as well as on both single and multiple bets. Cash Out functionality cannot be used on bonus bets. Cash Out requests might be subject to the same delay procedure as listed in Section (A)(5)(b). Should it happen that during this delay, for whatever reason, either the offer is removed, or odds fluctuate, the Cash Out request will not be accepted, and the Account Holder will be notified with an on-screen message. Bally's reserves the right to offer such functionality at its own discretion and does not acknowledge or accept any liability whatsoever should the functionality not be available. Should a Cash Out request be successful, the bet will be settled immediately and any subsequent events which occur in relation with the bet will not be considered. In the instance of a Cash Out bet having suffered from a technical, pricing or settlement error at any time between the time of original offering and the final settlement, Bally's reserves the right to rectify such inaccuracy in accordance with Section (A)(9)(b). ~~Cashout is not eligible for bonus bet wagers.~~

5. RESULT SETTLEMENT

~~For the avoidance of doubt the definition of same matchday/game week/round is to be interpreted as the order of fixtures as dictated by the governing body with each specific match representing a matchday/game week/round. Should this order not be upheld and the sequence of fixtures changes in a way that matches against other teams get scheduled in between so much that the listed fixture ceases to be the next official commitment from that particular tournament/league/competition for all teams involved, that will be considered as not part of the same matchday/game week/round and offers will be declared void. The~~

~~above does not apply to Season bets which will remain valid granted that the tournament/league/competition is held and decided during the season/year it refers to, regardless of any eventual date changes. In cases of Play-offs series or other series of matches which are scheduled to confront 2 teams over 2 or more matches, any re-scheduling of a single match will be considered as being part of the same matchday regardless of the length of the re-scheduling, granted that the order of home and away fixtures in the series is not modified and the listed fixture takes place within the series. Bets will be declared void otherwise.~~

A fixture is no longer deemed part of the same matchday/round if, due to rescheduling, it is no longer the next scheduled official match for all participating teams. In such cases, affected bets will be VOID. This rule does not apply to season or outright bets, which remain valid provided the competition is held and completed in the relevant season/year as displayed within the offer, regardless of scheduling changes. For playoff or multi-leg series, individual match rescheduling does not affect bet validity provided the order of home/away fixtures is maintained and the match occurs within the series framework. Otherwise, bets are VOID.

- (a) If two or more participants share the applicable finishing positions and no odds have been offered for a drawn outcome, the payout will be calculated using “Dead Heat” rules. The payout is calculated using the following equation:

$$\text{Payout} = \text{Stake} \times (\text{Odds} \div \text{Number of Participants Sharing the Certain Positions}).$$

The payout will always be at least equal to the stake, except in cases of “Head to Heads.” Examples of Dead Heat rules settlements include, but are not limited to, the following instances (All calculations use decimal odds):

Example 1

You bet \$20 on a participant to finish in the Top 20 at odds 2.0. The participant finishes tied 16th with 5 other players. Payout would be calculated as follows:

$$2.0 \times 5 = 10.0 \text{ (Original odds multiplied by number of places remaining in top 20)}$$

$$10.0 \div 6 = 1.67 \text{ (10.0 taken from output of the calculation above, divided by number of players sharing the remaining places in top 20)}$$

$$1.67 \times 20 = 33.40 \text{ (New odds multiplied by stake)}$$

Payout of \$33.40

Example 2

You bet \$10 on a participant to finish in the top 10 at odds 3.0. The participant finishes tied 10th with 3 other players. Payout would be calculated as follows:

$3.0 \times 1 = 3.0$ (Original odds multiplied by number of places remaining in top 10)

$3.0 \div 4 = 0.75$ (3.0 taken from output of calculation above, divided by number of players sharing 10th place)

$0.75 \times 10 = 7.50$ (New odds multiplied by stake)

Payout of \$10

Note here the payout computed is less than the original stake. As the rule states, payouts will always equal the stake except in cases of head to heads. In this example, the bet was not a head to head, and thus payout equals the stake of \$10.

Example 3

You bet \$10 on a participant to win his 3-ball at odds 2.40. The participant finishes tied for best score with 1 other player. Payout would be calculated as follows:

$2.40 \div 2 = 1.20$ (Original odds divided by number of players who tied)

$1.20 \times 10 = 12.0$ (New odds multiplied by stake)

Payout of \$12

Example 4

You bet \$10 on a participant to win his 3-ball at odds 1.50. The participant finishes tied for best score with 1 other player. Payout would be calculated as below:

$1.5 \div 2 = 0.75$ (Original odds divided by number of players who tied)

$0.75 \times 10 = 7.50$ (New odds multiplied by stake)

Payout of \$7.50

Note here the payout is less than the stake. As the rule states, payouts will always equal the stake except in cases of head to heads. In this example, the bet was a head to head, and thus payout can be less than the stake.

~~g—Should an event be moved from its originally announced venue and/or have its playing surface changed, this will not be treated as a cause for offers to be voided unless (i) the Sport specific rules dictate such, and/or the new location in which the event takes place is the habitual "home" pitch of either participant involved in the match. As a general principle, Bally's will refer to the Home team (host) and the Away team (visitor) in accordance with the definition issued by the governing body for that particular match/competition. Bets on matches played on so-called "Neutral pitches" will remain valid, regardless of whether such information has been detailed in the bet offer and/or the positioning of the teams on the betting board/display. In cases where there is a discrepancy between the positioning of the teams/participants on the official website and their placement on the betting board/display, and such discrepancy causes a significant effect on the odds of the match/competition Bally's will void the affected bets. Such eventuality is contemplated only in cases where the discrepancy has a material and visible effect on the odds. For example, in cases of swapped Home and Away teams in an Ice Hockey match Bally's will void the bets. Nevertheless Bally's will consider valid bets placed on events where the so-called home field advantage is not considered and in cases of neutral venues. Examples of such cases include but are not limited to tennis tournaments, MMA fights, singles competitions in general, or specific events such as the final/late stages of team competitions being held in pre-established venues, like the Superbowl, the NCAA Final 4 or the Italian Football Cup Final even if the location can be deemed as a potential customary "home" pitch for either of the teams involved. In such cases, said events will be considered as being played in neutral venues and all bets stand, regardless of the positioning of the teams/participants on the official website and their placement on the betting board/display.~~

g Bets remain valid if the venue or surface changes, unless the sport's specific rules state otherwise or the event is moved to the regular home venue of one of the teams involved. As a general principle, the designation of 'Home' (hose) and 'Away' (visitor) is determined by the governing body's official fixture list, not by the order teams appear on the betting interface. Furthermore, bets on matches at neutral venues remain valid regardless of how the teams are positioned in the betting display or whether neutrality is explicitly stated. Home/Away designations will not affect bets in sports or events where venue doesn't provide any material advantage, such as, but not limited to, Tennis, UFC events or MMA fights. Similarly, events held at pre-determined venues such as the NCAA Final Four or the Super Bowl are considered neutral even if one participant/team is playing at a location or venue deemed as a potential 'Home' pitch, such as, but not limited to, the Super Bowl being held in LA with the LA Rams being one of the participants.

C. SPORT SPECIFIC RULES

2. FOOTBALL

(c) In NCAA matches, should the playing time of any quarter(s) be shortened by mutual agreement of the opposing head coaches and referee, this will not serve as grounds to void any bets. All bet offers will be settled as normal based off of the official result at the end of the match.

(w) “Drive Crosses X Yard Line” markets will be settled according to the spot of the ball at the end of the drive. If the drive ends in a Field Goal, the final yardline is the line of scrimmage of the field goal attempt. If the drive ends in a Fumble, the final yardline is the yardline where the fumble occurred. If the Drive ends in an Interception, the final yard line is the line of scrimmage of the play during which the interception occurs.

27. ~~TENNIS AND~~ RACKET SPORTS (BADMINTON, SQUASH, & TABLE TENNIS)

29. MIXED MARTIAL ARTS

The following descriptions are to be considered as the applicable outcomes for the different scenarios:

- “Finish Only”: No outcome (Void) if there is no finish;
- “Decision Only”: No outcome (Void) if there is no decision;
- “Submission Only”: No outcome (Void) if there is no submission;
- “KO/TKO/DQ Only”: No outcome (Void) if there is no KO/TKO/DQ finish;
- “Round 1 Only”: No outcome (Void) if there is no Round 1 finish.

30. SNOOKER

1. In cases of a re-rack all bets on that specific frame ~~will be settled as void and a new market will be opened~~ will stand. Any occurrence that has already been determined before the re-rack will be settled, with the exception of “Total Points – Frame” and “Both Players to Score 20+ Points – Frame” bet offers, in which case only the points scored after the re-rack will count towards settlement.
2. Offers combining a number of occurrences by a specific player/team within a match/event, require that all connotations related to the bet offer must be fully and unquestionably complied with. Should one or more parts of the offer end in a tie bets will be settled as LOST.



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

FROM: Andrew Steffen – Compliance Operations Manager, Sports Wagering

MEETING: 5/21/2026

RE: UFC Freedom 250 – Regulatory and Integrity Overview

EXECUTIVE SUMMARY:

This memo is intended to provide a factual overview of the upcoming UFC Freedom 250 event, with a focus on its regulatory structure, sanctioning framework, and integrity considerations. Unlike standard UFC events, UFC Freedom 250 is being held on federal property and is not proceeding under the oversight of a state athletic commission. The purpose of this memo is to outline key details relevant to sports wagering compliance and to identify areas that may warrant further discussion by the Commission.

This memo also responds to the following questions posed by Commissioner Brodeur regarding the regulatory structure and oversight of the event:

1. Given that ABC is serving in an advisory role, is it correct to conclude that UFC is serving as a self-regulator?
2. Given that the UFC has chosen not to apply for a permit with the DC Combat Sports Commission and be governed by its regulatory requirements, what are the applicable regulatory standards to be applied to this event?
3. Does ABC have the ability/authority to prevent the event or certain bouts from going forward should it identify regulatory violations?

REGULATION BACKGROUND:

Pursuant to [205 CMR 247](#), the Commission maintains authority over the approval and continued authorization of sporting events eligible for sports wagering. The regulations provide the Commission with discretion to remove previously approved events from wagering where necessary to protect the integrity of wagering, promote public confidence, and ensure consumer protection. This authority allows the Commission to respond to evolving integrity risks and



emerging information related to specific sports, leagues, or competitions, even after initial approval has been granted.

DISCUSSION:

UFC Freedom 250 is scheduled to take place on June 14, 2026, on the South Lawn of the White House in Washington, D.C.^[1] The event is promoted by the Ultimate Fighting Championship (UFC), which operates under TKO Group Holdings and is being held in connection with the 250th anniversary of the United States as a one-time commemorative fight card. The fight card itself is expected to feature multiple championship bouts^[2] and will follow the standard UFC structure, including five-round title fights and three-round non-title fights conducted under the Unified Rules of Mixed Martial Arts as developed by the Association of Boxing Commissions and Combative Sports (ABC).^[3]

According to information provided by integrity monitoring firm IC360, bouts on the card are expected to count toward the fighters' official professional records in the same manner as standard UFC events. The event will also be broadcast nationally via Paramount+, with both preliminary and main card bouts available on a single platform.

The event is being held on federal property rather than within a traditional state-regulated venue. As a result, the event is not proceeding under the jurisdiction of a state athletic commission, such as the District of Columbia Combat Sports Commission. In standard UFC events, a state or tribal athletic commission typically serves as the independent governmental regulator responsible for licensing fighters, referees, and judges; conducting weigh-ins and pre-fight medical examinations; assigning officials; enforcing applicable rules; and certifying official bout results. That structure creates a separation between the promoter and the regulatory authority overseeing event operations. In this instance, that conventional commission-based regulatory model is not present, representing a deviation from the standard oversight framework typically applied to professional mixed martial arts events in the United States.

As part of the Commission's review of UFC Freedom 250, Commissioner Brodeur requested that staff address questions related to the regulatory structure and oversight of the event:

1. Given that ABC is serving in an advisory role, is it correct to conclude that UFC is serving as a self-regulator?

While the UFC is essentially acting as a self-regulating entity for this event, they have voluntarily outsourced operational oversight to an independent third-party to replicate a standard

¹ [UFC Event Site](#)

² [Fight Card](#)

³ [Unified Rules of Mixed Martial Arts](#)



regulatory environment, involving the ABC in a role publicly described as advisory and coordinating.^[4] The ABC is responsible for developing the Unified Rules of Mixed Martial Arts and providing guidance across jurisdictions; however, it does not function as a governmental regulatory authority and does not typically serve as the primary sanctioning body for individual events. Those responsibilities are typically reserved for individual state athletic commissions, many of which are federation members of the ABC.^[5]

Unlike traditional UFC events, there is no state athletic commission applying statutory authority over licensing, enforcement, or event approval for UFC Freedom 250. Primary operational responsibility for implementing event standards, including officiating, medical requirements, and bout conduct, will rest with the UFC. According to information provided by IC360, the ABC has assigned experienced state regulators, including ABC President and Florida State Boxing Commission Executive Director Timothy Shipman, to assist in oversight of officiating, judging, medical protocols, drug testing, and event operations.

Timothy Shipman is cited as saying *“As the event is being held on federal property, there is no requirement for the UFC to select a state athletic commission to oversee the event. The UFC expresses its commitment to ensuring that this event is among the most thoroughly regulated in the history of the sport and has requested that the ABC serve as an independent third party to assist in assembling the most qualified group of judges, referees and inspectors in the world. The UFC has further confirmed that it will abide by all applicable regulatory requirements in support of this event, including all required medical examinations, pre-bout and post-bout physicals, and athlete safety protocols. All bouts on this card are officially licensed and sanctioned contests.”*^[6]

Also, in researching this event, the Sports Wagering Division found that the UFC has previously conducted certain international events in jurisdictions without a local athletic commission or equivalent governmental combat sports regulator. In those instances, operational oversight functions typically performed by a state athletic commission were administered through UFC operational procedures and event-specific oversight arrangements.^[7]

2. Given that the UFC has chosen not to apply for a permit with the DC Combat Sports Commission and be governed by its regulatory requirements, what are the applicable regulatory standards to be applied to this event?

The event is expected to follow the Unified Rules of Mixed Martial Arts, as well as internal policies and procedures of the UFC governing fighter eligibility, medical testing, officiating, and safety protocols. These standards are widely recognized within the sport; however, they are not being applied through a state regulatory framework in this instance.

⁴ [Per UFC article dated 3/19/26](#)

⁵ [List of ABC Members](#)

⁶ [Per CBS Sports article dated 4/15/26](#)

⁷ [Per UFC article dated 8/26/14](#)



According to IC360, the event is expected to proceed under the same general competition structure and ruleset utilized during standard UFC events, and IC360 indicated it is not aware of any planned deviations from the Unified Rules of Mixed Martial Arts or other competition rule changes for the event.

The event is expected to follow standard UFC operational practices, including the use of a regulated competition format, established rules of mixed martial arts, and recognized officiating personnel.

3. Does ABC have the ability/authority to prevent the event or certain bouts from going forward should it identify regulatory violations?

The ABC does not function as a governmental regulatory authority and does not possess independent statutory licensing authority comparable to a state athletic commission. However, according to information provided by IC360, experienced regulators operating within the ABC framework are expected to oversee officiating, judging, medical oversight, and drug testing for the event, and may possess operational authority to stop individual bouts or halt competition should they identify medical, safety, or regulatory concerns. The exact scope of that authority has not been publicly detailed.

Additional Security and Integrity Considerations

The event has reportedly been designated as a SEAR 1 (Special Event Assessment Rating) by the U.S. Department of Homeland Security.^[8] A SEAR 1 is defined as “Significant events with national and/or international importance that require extensive federal interagency support”.^[9] This designation reflects a high level of federal coordination and security planning. While primarily related to physical security, the designation indicates a significant level of federal involvement in event operations. The extent of that involvement is not yet publicly known.

IC360 also stated that it has reviewed the regulatory structure of the event and does not currently have integrity concerns.

The Sports Wagering Division has learned through other regulators and our licensed operators that the 32 jurisdictions of Arizona, Arkansas, Colorado, Connecticut, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Missouri, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Ontario, Oregon, Pennsylvania, Rhode Island, Tennessee, Vermont, West Virginia, Washington, and Wisconsin are currently allowing the event to be offered for wagering in their respective jurisdictions. As of May 14, no jurisdiction has stated they will prohibit or restrict the event for wagering.

⁸ [Per ABC News article dated 4/21/26](#)

⁹ [DHS SEAR Fact Sheet](#)



Sports Wagering Division

Lastly, it should be noted that both the ABC and UFC are approved governing bodies as listed in the [Massachusetts Sports Wagering Event Catalog](#).

Sport	Governing Body	League	Website
MMA	Ultimate Fighting Championship (UFC)	UFC	https://www.ufc.com/
	Ultimate Fighting Championship (UFC)	Road to UFC	https://www.ufc.com/
	Ultimate Fighting Championship (UFC)	Dana White's Contender Series	https://www.ufc.com/
Return to Index	Bellator MMA	Bellator	https://www.bellator.com/
	ONE Championship	ONE Championship	https://www.onefc.com/
	Professional Fighters League (PFL)	PFL	https://www.pflmma.com/
	Professional Fighters League (PFL)	PFL Challenger Series	https://www.pflmma.com/challenger-season/2022
	Association of Boxing Commissions and Combative Sports (ABCCS) members or other US State Associations	ABCCS members or other US State Associations sanctioned events.	https://www.abccboxing.com/
	Cage Warriors		https://cagewarriors.com/
	Invicta Fighting Championship		https://invictafc.com/
	KSW		https://www.kswmma.com/
	Legacy Fighting Alliance (LFA)		https://www.lfa.com/
	Spectation Sports		https://spectationsports.com/

CONCLUSION:

UFC Freedom 250 presents a non-traditional regulatory structure compared to standard professional mixed martial arts events. The combination of the federal venue, alternative sanctioning framework, and unique operational structure introduces considerations relevant to sports wagering compliance and event integrity.

This memorandum is intended to provide a factual foundation for Commission discussion regarding the regulatory, operational, and integrity-related considerations associated with the event.



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

FROM: Carrie Torrisi, Chief of Sports Wagering Division

DATE: May 13, 2026

RE: FY27 Audit Topics

The Commission's regulation 205 CMR 239.07 states that "[t]he Commission shall have the discretion to audit on an annual basis, and at other times the Commission, the Bureau, or the Sports Wagering Division determines necessary the accounts, programs, activities, and functions of an Operator or any aspect of Sports Wagering Operation and compliance with any provision of the Operator's system of internal controls." At a Commission meeting on July 31, 2025, the Sports Wagering Division discussed returning to the Commission on an annual basis to propose specific audit topics for the upcoming fiscal year.

While we do not yet have the final reports for the FY26 audit, the topics audited during the FY26 cycle included: (1) past-posting procedures and controls; (2) void/override procedures and controls; (3) underage gaming procedures and controls; and (4) marketing and advertising procedures and controls. The audit of these topics centered largely around a review of whether operators were compliant with their own sets of procedure and controls.

For the FY27 cycle, we propose the following topics and adjustment to the focus/scope in certain areas in order to drill down more on these practices:

1. **Sufficiency of Past Posting Controls:** This topic would focus on whether the operators' controls with respect to past posting incidents are sufficient/meet industry standards rather than whether their execution is consistent with their controls.
2. **Execution of Voids in Compliance with Commission Guidance:** This topic would focus on whether the operators have consistently performed voids in compliance with the Commission's recent guidance rather than whether their execution is consistent with their own controls.
3. **Underage Access and Usage Controls and Procedures:** This topic would be a higher level review of what protocols and procedures operators have in place to detect underage access and usage of the platforms (such as detecting using others' information or using the account of someone who successfully passed KYC) rather than focusing on the ability



Massachusetts Gaming Commission

of the operators' KYC procedures to prevent underage account creation.

4. **Patron Limiting Controls and Notifications:** This topic would focus on the newly-required internal controls related to patron limiting and the corresponding notifications to ensure that the controls and execution are consistent with the Commission's expectations.¹

We have discussed this proposal with the Commission's auditor, Eide Bailly, and have confirmed that executing this scope for the seven mobile operators would fall within our existing budget and agreements.

We seek the Commission's approval to move forward with these proposed audit topics for for FY27.

¹ The Sports Wagering Division will also be reviewing these internal controls and notifications, but including this topic in the FY27 audit will allow for a more in-depth review.



Massachusetts Gaming Commission



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

FROM: Richard Lawless, Licensing Division Manager

CC: Kara O'Brien, Licensing Division Chief and Caitlin Monahan, IEB Director

DATE: May 21, 2026

RE: Encore Boston Harbor Exemption Request: Guest Experience Attendant

OVERVIEW

The Licensing Division has received a request to exempt a new position at Encore Boston Harbor: Guest Experience Attendant from the service registration requirement.

STANDARD

Pursuant to G.L. c. 6, § 172(o) and 205 CMR 134.03(1)(b), the Commission may exempt a job position from categorization as a gaming service employee. The Commission may at any time, in its discretion, revisit any job position.

On January 18, 2018, the Commission endorsed the following factors for consideration when making exemption determinations:

- Work performed on the gaming floor;
- Managerial responsibilities in any department;
- Supervisory responsibilities in Human Resources or Sales and Marketing;
- Responsibilities for alcohol sales, distribution, service and/or storage;
- Access to secure casino back-of-the-house areas (including executive offices) without security escort;
- Responsibilities for accounting and/or finance relating to the gaming establishment
- "Write" access to gaming-related casino databases; and
- Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information.

DISCUSSION

Encore Boston Harbor requests an exemption for a new position in the Hotel Front Services Department. The position requested to be exempt is Guest Experience Attendant. An employee in this position will specifically work in the hotel reception area at Encore Boston Harbor. Job responsibilities include collecting and returning lost items to guests, assisting with printing services, assisting with valet ticketing kiosks, and answering questions regarding valet services. The employee will not receive, handle, or transport gaming-related equipment.



Massachusetts Gaming Commission

The Licensing Division worked with Kara Henson, Director of Talent Acquisition, Encore Boston Harbor, to obtain the necessary information to develop this request, including the required Exemption Petition Form and job description.

RECOMMENDATION

The Licensing Division recommends that the Commission support this position being exempted from the service registration requirement.



Massachusetts Gaming Commission

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



MASSACHUSETTS GAMING COMMISSION POSITION EXEMPTION FORM

This form shall be submitted to request an exemption from the registration requirement, or to amend or rescind an exemption. A copy of the job description and department organizational chart must be attached.

GAMING LICENSEE: Exempt Request

POSITION TITLE: Guest Experience Attendant

JOB CODE: Full time & Part position # 00012026,00012027

THIS IS A REQUEST TO:

- Exempt a gaming service employee position from the registration requirement.
- Withdraw a position from exempt status and require a gaming service employee registration.

DOES THE POSITION:	YES	(OR)	NO
• Involve work performed on the gaming floor?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Manage other staff members?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Have supervisory responsibilities in Human Resources or Sales / Marketing?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Involve alcohol sales, distribution, service, and / or storage?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Have access to secure back-of-house areas (including executive offices) without security escort?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Have responsibility for accounting and / or finance relating to the gaming establishment?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Have "write" access to the gaming-related casino databases?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Have any authority to offer complimentary services, such as transportation, food, lodging, or entertainment?	<input type="checkbox"/>		<input checked="" type="checkbox"/>
• Have responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information?	<input type="checkbox"/>		<input checked="" type="checkbox"/>

The Commission considers the above non-exhaustive list of factors when determining whether a position is eligible for exemption.

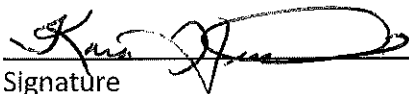
EXPLANATION: (Provide details for any question marked "yes".)

OTHER: (Provide any other information related to the position or request.)

Please see attached Hotel Front Services job description

The undersigned representative of the Licensee states that the information herein is true and accurate.

If requesting withdrawal of an exempt position, the representative also acknowledges individuals hired by the gaming licensee for this position must register in accordance with 205 CMR 134.09 prior to engaging in the provision of employment services if the withdrawal is approved.


Signature

Kara Henson

/ Printed Name

03/18/2026

Date



Guest Experience Attendant

POSITION SUMMARY

The **Encore Boston Harbor Guest Experience Attendant** will be responsible for providing friendly, helpful and attentive customer service while assisting resort guests, in person and over the phone. Responsibilities include, but are not limited to: coordinating with security, housekeeping, front desk, call center to collect, store and return lost items while maintaining meticulous inventory record; assisting with printing services; offering valet kiosk ticketing support; supporting guests with questions surrounding valet services, including damage claims; providing directional support and assistance to guest requests and inquiries; and consistently delivering and maintaining Wynn service standards.

JOB RESPONSIBILITIES:

- Ensures all Encore Boston Harbor core values and property and department standards are implemented and applied.
- Participates in short-and long-term departmental goals, objectives, policies, and operating procedures; monitors and evaluates operational effectiveness; effects changes required for improvement. Identifies key drivers of success.
- Delivers and maintains a maximum level of property-wide service and satisfaction.
- Adheres to all Forbes Travel Guide and Wynn service standards.
- Welcomes, greets, interacts, and assists guests in a professional and friendly manner.
- Organizes the office areas and answers all incoming guest and staff's questions while serving as the primary contact for general resort and guest service questions.
- Maintains a series of logs for record keeping of hotel's lost and found properties. Other record keeping functions will vary according to the needs of the department.
- Receives all lost and found articles for the hotel and casino and maintains inventory, tagging and logging all items and articles in a safe and secure manner until items are claimed, mailed out, or donated.
- Composes accident/incident reports and witness statements when necessary.
- Assists with valet kiosk ticketing when necessary.
- Balances multiple priorities simultaneously and meets deadlines, often in stressful and high-pressure situations.
- Exhibits a professional demeanor and willingness to assist all guests whenever possible.
- Responds to and resolve guest complaints in a timely manner and creatively solve problems with the ability to anticipate, recognize, evaluate, and resolve potential difficulties.
- Produces copies and printed materials when requested and necessary
- Assists with shipping and receiving of guest packages when necessary.
- Works with safety as a priority, and follows department and company safety standards.
- Actively contributes to the departmental performance, and the accuracy, confidentiality, and thoroughness of departmental policies and procedures; records and reports.
- Verifies that all applicable internal policies, federal and state laws, rules, regulations and controls property wide are enforced within the department.
- Performs any other job-related duties as assigned.

JOB REQUIREMENTS:

To perform this job successfully, an individual must be able to perform each job responsibility satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or

ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Age, Gaming and Certifications:

21 years of age or above.

Education and/or Experience:

High school or equivalent degree preferred.

Minimum of 1 year of guest service experience preferred.

Requires general computer skills and basic knowledge of Microsoft Office.

Must possess outstanding organizational, interpersonal, and administrative skills, as well as excellent attention to detail.

Language Skills:

Ability to read, analyze, and interpret documents, such as policy and procedure manuals, maintenance instructions, and other related documents. Ability to respond to common inquiries from other employees or guests. Fluency in English required, second language a plus. Ability to write detailed instructions and correspondence. Ability to effectively present information in one-on-one and group situations.

Mathematical Skills & Reasoning Ability:

Ability to compute basic mathematical calculations. Ability to decipher various reports and maintain reports upon request.

Physical Demands:

The physical demands described here are representative of those that must be met by the Team Member to successfully perform the essential functions of this job.

While performing the duties of this job, the employee is regularly required to talk and hear. The employee is also regularly required to stand, walk, sit, and use hands to finger, handle, or feel objects, tools or controls. The employee is occasionally required to reach with hands and arms, and to sit, climb or balance, and stoop, stretch, bend, kneel, crouch, or crawl.

Specific vision abilities required by this job include close vision, distance vision, color vision, peripheral vision, depth perception, and the ability to adjust focus. Essential responsibilities include moderate physical ability such as lift or maneuver at least thirty (30) pounds, and varied instances of standing/walking.

Work Environment:

The work environment characteristics described here are representative of those that exist while Team Members are performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

- The noise level in the work environment is typically moderate. When on the casino or property floor or some back of house areas, the noise level increases to loud. Must be able to interact with internal and external guests in a professional manner.
- Due to the unpredictable nature of the hospitality/entertainment industry, Team Members must be able to work varying-schedules to reflect the business needs of the property.



Division of Licensing

TO: Chair Maynard and Commissioners O'Brien, Hill, Skinner, and Brodeur
FROM: Richard Lawless, Licensing Manager
CC: Kara O'Brien, Licensing Division Chief and Caitlin Monahan, IEB Director
DATE: May 21, 2026
RE: Plainridge Park Casino's Application for Amendment of Gaming Beverage License

Overview: Plainridge Park Casino (PPC) has applied for an amendment of its gaming beverage license to modify the beverage service hours for The Sportsbook at Plainridge licensed area. The floorplan and licensed beverage areas of the casino will remain otherwise unchanged.

Standard: Under G.L. c. 23K, § 26, and 205 CMR 136.03 and 136.04, the Commission is authorized to amend the license for the sale and distribution of alcoholic beverages to be drunk on the premises of the gaming establishment.

Pursuant to 205 CMR 136.03(3), the Division of Licensing "shall review the application to determine whether it contains all of the elements required in accordance with 205 CMR 136.04."

Accordingly, "[i]f the Division of Licensing is satisfied that the application meets the requirements of 205 CMR 136.04 and M.G.L. c. 23K, § 26, and that any modifications requested in accordance with 205 CMR 136.03(2) have been satisfactorily addressed, it shall forward the application to the [C]ommission with a recommendation that it be approved."

Discussion: The Division of Licensing has reviewed the amendment application and has determined that it is complete and in conformance with all regulatory requirements. It is the opinion of the Division that there is sufficient information regarding the description of the storage and service of the beverages¹.

RECOMMENDATION OF THE LICENSING DIVISION

After reviewing the amendment application, the Licensing Division recommends that the Commission approve Plainridge Park Casino's application to amend its gaming beverage license to change the hours of service for The Sportsbook at Plainridge licensed area.

¹ The licensed area application must contain "a description of the licensed area including the ... number and location of alcoholic beverage dispensing areas." 205 CMR 136.04(2)(b).



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennentertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

The Sportsbook at Plainridge MGCGBLR3-3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| <input type="checkbox"/> NEW LICENSED AREA | <input type="checkbox"/> DESCRIPTION OF LICENSED AREA |
| <input type="checkbox"/> CHANGE IN CAPACITY | <input type="checkbox"/> ALCOHOL STORAGE |
| <input type="checkbox"/> JOINTLY RESPONSIBLE PERSON | <input checked="" type="checkbox"/> CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is \$100.00

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

The Sportsbook at Plainridge

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN: #3 The Sportsbook at Plainridge floor plan, Casino & Racing 1st Floor (Red)

This amendment seeks to change the Sportsbook at Plainridge restaurant's hours from 11am-12am to 8am-1am.

The Sportsbook at Plainridge is an open space sports themed restaurant with a full service bar and is highlighted in red on the Casino & Racing Floor, floor plan. There are 187 seats in the venue. There will be bartenders and food servers serving both food and beverages in the venue. Servers will send their drink orders through the point of sale system. This will be printed out at the bar and prepared for the server to pick up. There are 28 tables 161 seats including 26 seats at the bar. Liquor is primarily dispensed through a measured gun system connected to the point of sale system. Free pour liquor will be measured with a jigger device. There are 24 draft beer taps in the venue.

There are 3 points of exit in the restaurant as marked in green arrows on the #3 Sportsbook at Plainridge floor plan map provided. An additional point of entry/exit (marked with a yellow arrow) to this space exists via the designated entrance to the sports betting counter area.

Bottle service will not be offered in this venue.

HOURS OF OPERATION

7 days, 8am-1am

CAPACITY OF LICENSE AREA

150 Occupants/4,367 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? YES NO IF YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OLF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Liquor will be removed from the bar on a nightly basis and be secured in the liquor storage that is located in the hallway at the rear of the restaurant highlighted light blue on the #3 Sportsbook at Plainridge and Casino & Racing 1st Floor, provided floor plans. Bottled beer is locked in coolers behind the bar. The measured gun system and beer taps are locked. Wine and Liquor is stored in a cabinet/rolling cage located behind the bar and locked.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

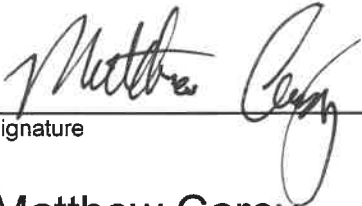
Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

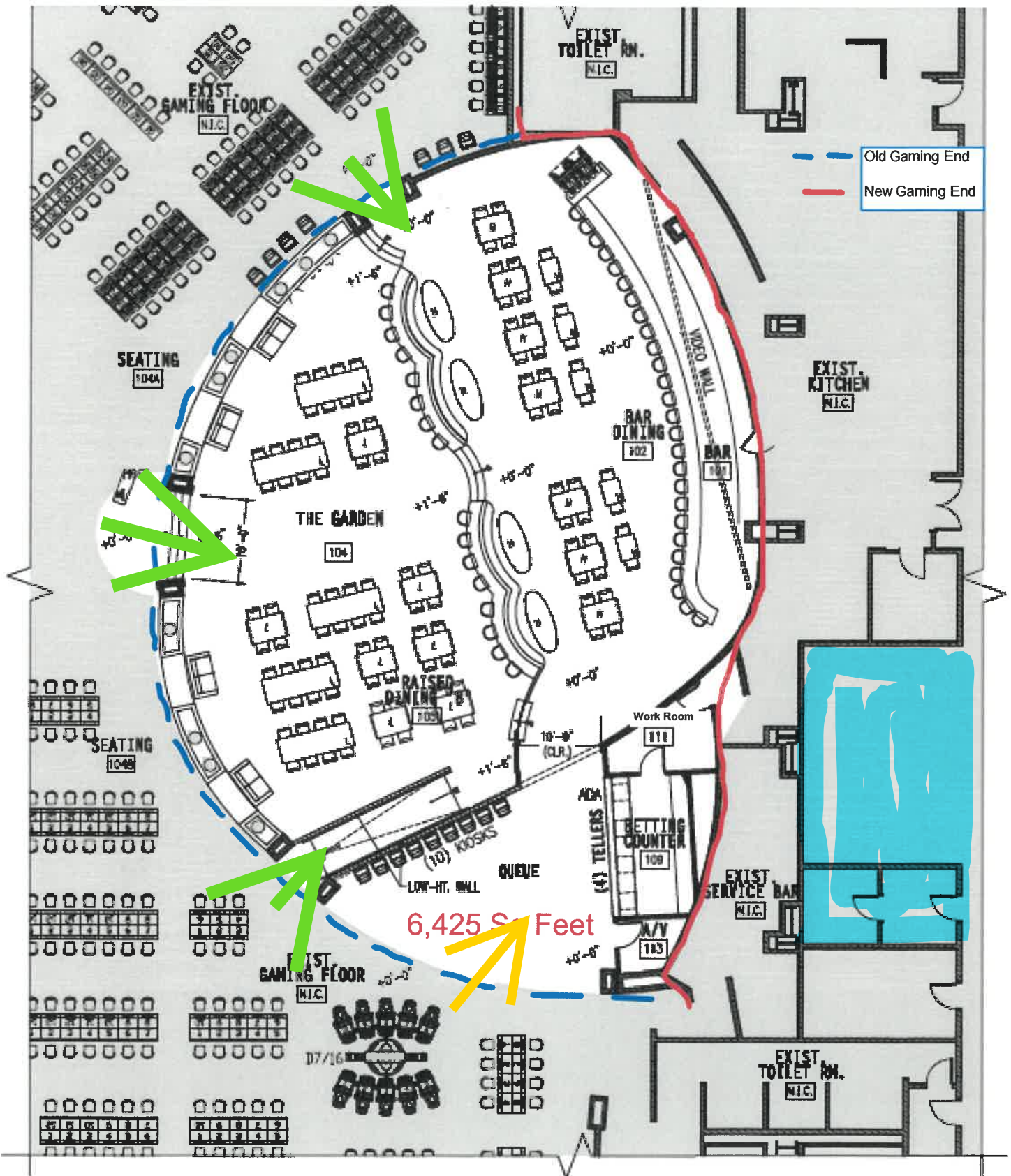
Print Name

F&B Director

Title



Date



— Old Gaming End
 — New Gaming End

6,425 Feet



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

FROM: Melanie Foxx, Associate General Counsel
Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian

CC: Kevin Scanlon, General Counsel
Justin Stempeck, Chief Deputy General Counsel

DATE: May 21, 2026

RE: 205 CMR 3.00: Harness Horse Racing

Overview:

Enclosed for the Commission's review are the proposed final drafts of **205 CMR 3.02: Definitions**; **205 CMR 3.28: Prohibited Practices**; **205 CMR 3.29: Medications and Prohibited Substances**. The regulations were first presented for initial discussion and review on March 26, 2026, and the Commission voted to promulgate all of the above-mentioned drafts by normal course, except for 205 CMR 3.02 which was voted to be enacted by emergency. The amendments are authorized by G.L. c. 128A, §§ 9 and 9B.

205 CMR 3.02 was filed by emergency on March 27, 2026, and has been making its way through the promulgation process along with 205 CMR 3.28 and 205 CMR 3.29. A public hearing was held on May 5, 2026, and no additional comments were provided to the Commission. In accordance with G.L. c. 128A, § 9B, 205 CMR 3.00 will be filed with the Legislature on or about May 21, 2026, for the requisite 60-day period.¹ The regulations are now back before the Commission with an amended small business impact statement, a request for a vote of final adoption and a request for approval to send to the Legislature.

Summary of Regulations:

205 CMR 3.02: Definitions. This section is being amended to add definitions for the Association of Racing Commissioners International (ARCI) and the United States Trotting Association (USTA), to include the specific date and version. The amendments are meant to clearly identify which versions of the rules are being used.

¹ To accommodate the required 60-day filing period with the legislature, 205 CMR 3.02 will be re-filed by emergency on or before June 26, 2026, with the Secretary of State to prevent a lapse before the final adoption.



Massachusetts Gaming Commission

205 CMR 3.28: *Prohibited Practices.* This section is being amended to correct an incorrect citation from “205 CMR 3.28(5),” to “Annex I.” Additional changes include changing the word “breeze” to “qualify” and the word “jockeys” to “drivers” to reflect the terminology used in Standardbred Racing.

205 CMR 3.29: *Medications and Prohibited Substances.* This section is being amended to remove the language in Section 2A, as the Racing Division does not use this multiple medication violation system.



Massachusetts Gaming Commission

3.01 : continued

Every license to hold a meeting is granted upon the condition that the licensee shall accept, observe and enforce 205 CMR 3.00. Furthermore, it shall be the duty of each and every officer, director and every official and employee of said licensee to observe and enforce 205 CMR 3.00. Any and all of 205 CMR 3.00 may be amended, altered, repealed or supplemented by new and additional rules.

The Commission may make exceptions to any rule or rules in individual instances as in their judgement they may deem proper.

The Commission may rescind or modify any penalty or decision or infraction of the rules imposed or made by the racing officials.

M.G.L. c. 128A, and 205 CMR 3.00 supersede the conditions of a race, or the regulations of a race meeting.

205 CMR 3.00 as promulgated by the Commission are supplemented by the State Administrative Procedure Law found in M.G.L. c. 30A. M.G.L. c. 30A provides the procedures that must be followed by all state agencies on such matters as the amending process and the adjudicatory procedure. Under M.G.L. c. 30A, any interested party has the right to attend all hearings conducted by the Commission for the purpose of the adoption or amendment of any rule or regulation. The Commission shall afford any interested person an opportunity to present data, views or arguments in regard to any proposed rule change. Upon written notice to the Commission, a person may request the adoption, amendment or repeal of any regulation with an opportunity to present data, views or arguments in support of such request.

If a dispute should arise concerning a ruling by a steward or other racing official, any party affected by such ruling has a right to an appeal to the Commission in accordance with the provisions of 205 CMR 101.02.

The rules on pari-mutuel wagering are located in an entirely separate rulebook entitled 205 CMR 6.00: *Pari-mutuel Rules for Horse Racing, Harness Horse Racing and Greyhound Racing*.

The Massachusetts Gaming Commission adopts the United States Trotting Association (USTA) Rules and Regulations as amended; and supplements those rules and regulations with 205 CMR 3.00.

In any situation where a conflict exists between the United States Trotting Association Rules and 205 CMR 3.00, 205 CMR 3.00 will govern. In any instance where a situation is not covered by the USTA Rules, 205 CMR 3.00 will govern and *vice versa*. The assessment of fines and suspensions shall be in the discretion of the Judges and the Gaming Commission.

3.02 : Definitions

The following definitions and interpretations shall apply in 205 CMR 3.00, unless the text otherwise require:

Administer or Administration is the introduction of a substance into the body of a horse.

ARCI shall mean the Uniform Classification Guidelines for Foreign Substances And Recommended Penalties Model Rule, December 8, 2025, Version 19.1 as promulgated by the Association of Racing Commissioners International.

Arrears includes all monies due for entrance, forfeits, fees, forfeitures, subscriptions, stake, and also any default in money incident to the Rules.

Associated Person is the spouse of an inactive person, or a companion, family member, employer, employee, agent, partnership, partner, corporation, or other entity whose relationship, whether financial or otherwise, with an inactive person would give the appearance that such other person or entity would care for or train a racing animal or perform veterinarian service on a racing animal for the benefit, credit, reputation, or satisfaction of the inactive person.

3.02: continued

Association is any person or persons, associations, or corporations licensed by the Commission to conduct harness horse racing within the Commonwealth of Massachusetts for any stake, purse or reward.

Assumed Name shall be a name other than the given name or legal name of an individual. Assumed names shall include but shall not be confined to racing, stable names, farm names, association, corporations, partnerships (when the actual legal names of the partners are not used), *Nam de Course, etc.*

Authorized Agent is a person appointed by a written instrument signed by the owner and filed in accordance with 205 CMR 3.05.

Bleeder is a horse which has demonstrated external evidence of exercise induced pulmonary hemorrhage.

Bleeder List is a tabulation of all bleeders to be maintained by the Commission.

Breeder of a Horse is the owner of its dam at the time of foaling.

Breeding Place is the place of horse's conception.

Calendar Day is 24 hours ending at midnight.

Controlled Therapeutic Medication is any medication approved by the Association of Racing Commissioners International for which the regulatory analyte concentration in the sample(s) may not exceed specified regulatory limits published in 205 CMR 3.00.

Declaration shall mean the naming of a particular horse to a particular race as a starter.

Ejected shall mean the removal from the grounds of an Association.

Entry shall mean according to the requirements of the text:

- (a) a horse made eligible to run in a race,
- (b) two or more horses which are entered or run in a race owned by the same owner or trained by the same trainer.

Equipment, as applied to a horse, shall mean harness, hobbles, bits, shadow rolls, blinkers, poles, tongue straps, bandages, boots, toe weights, gaiting straps, shoes, head numbers, saddle numbers, sulkies, whips, spurs, etcetera.

Field, when the individual horses competing in a race exceed the numbering capacity of the Tote, the highest numbered horses within the capacity of the Tote, and all horses of a higher number shall be grouped together and called the "Field."

Forfeit shall mean money due because of an error, fault, neglect of duty, breach of contract, or a penalty.

Forfeiture shall mean any money imposed as a penalty by the Judges or Starter of the meeting.

Furosemide List means a tabulation of all horses eligible to participate in a race with furosemide in their system.

Inactive Person is any person whose license has been suspended for more than 30 days; whose license has expired or been revoked; or whose license application has been denied.

Judges shall mean the Judges of the meeting or their duly appointed deputies.

3.02: continued

Law or Laws shall mean M.G.L. c. 128A.

Licensee shall mean any Association receiving a license from the Commonwealth of Massachusetts to conduct harness horse racing.

Medication is any substance or metabolite capable of exerting a pharmacological effect on the horse's system with an accepted use in the diagnosis, cure, treatment or prevention of a veterinary medical condition.

Meeting is the whole consecutive period for which license to race has been granted to any one Association by the Commission.

Month is a calendar month.

Nominator is the person in whose name a horse is entered for a race.

Owner includes sole owner, part owner or lessee of a horse. An interest only in the winnings of a horse does not constitute part ownership.

Place in racing shall mean first, second, third or fourth position at the finish of a race and in that order is called "Win," "Place," "Show" and "Fourth."

Post Position is the position assigned to the horse at the start of the race.

Post Time is the time set for the arrival at the starting point of the horses in a race and must be shown a reasonable time prior to the race on a clock device, provided for that purpose, prominently displaced and clearly readable from the grandstand.

Race. A contest between horses for purse, stakes, premium, wager for money or admission fees on any course and in the presence of a judge or judges.

Race Day means any period of 24 hours beginning at midnight and included in the period of a race meeting and in the matter of penalties the word "day" means a "race day."

Recognized Meeting shall be any meeting wherever held under the sanction of the United States Trotting Association having reciprocal relations with the Massachusetts Gaming Commission for the mutual enforcement of rulings imposed on persons guilty of fraudulent turf practices of any kind.

Rule Off shall mean the act of debarring from the grounds of an Association and denying all racing privileges.

Rules shall mean all the rules and regulations of the USTA and 205 CMR 3.00.

Scratch shall mean the act of withdrawing an entered horse from a race after the closing of overnight entries.

Scratch Time shall mean the time set by the Association for the closing of applications for permission to withdraw from races of that day.

Starter. A horse is a "starter" for a race when the Starter dispatches the horses with the word "Go."

Subscription shall mean the act of nominating to a stake race.

Suspended shall mean that any privilege granted to a licensee of the Commission by the officials of a racing meeting or by the Commission has been withdrawn.

3.02 : continued

Tote or Tote Board shall mean the totalisator.

USTA shall mean the Rules and Regulations of the United States Trotting Association, Published May 1, 2025.

Year shall mean a calendar year.

3.03 : Appeal to the Commission

(1) A final appeal in the case of any person penalized or disciplined by the racing officials of a meeting licensed by the Commission may be taken to the Commission, consistent with the provisions of 205 CMR 101.02: *Review of Orders or Civil Administrative Penalties/Forfeitures Issued by the Bureau, Commission Staff; or the Racing Division.*

3.04 : Stable Names, Registration Fees, Restrictions, etc.

- (1) Each stable name must be duly registered with the Commission.
- (2) In applying to race under a stable name, the applicant must disclose the identity or identities behind a stable name.
- (3) If a corporation is involved in the identity behind a stable name, 205 CMR 3.06 must be complied with.
- (4) Changes in identities must be reported immediately to and approval obtained from the Commission.
- (5) A person cannot register more than one stable name at the same time nor can he or she use his or her real name for racing purposes so long as he has a registered one.
- (6) Any person who has registered under a stable name may at any time cancel it after he or she has given written notice to the Commission.
- (7) A stable name may be changed at any time by registering a new stable name and by paying the required fee.
- (8) A person cannot register as his or her stable name one that has been registered by any other person with any Association conducting a recognized meeting.
- (9) A person may not register as his or her stable name one which is the real name of any owner of race horses nor one which is the real or assumed name of any prominent person not owning race horses.
- (10) A stable name shall be plainly distinguishable from that of another duly registered stable name.

3.27: continued

(f) Any horse entered for racing must be present on the grounds prior to the scheduled furosemide administration time or one hour prior to first post time, whichever is earlier.

(4) Veterinarians' Reports.

(a) Every veterinarian who treats a racehorse at any location under the jurisdiction of the Commission shall, in writing on the medication report form prescribed by the Commission, report to the official veterinarian or other Commission designee at the racetrack where the horse is entered to run or as otherwise specified by the Commission, the name of the horse treated, any medication, drug, substance or procedure administered or prescribed, the name of the trainer of the horse, the date and time of treatment and any other information requested by the official veterinarian.

(b) The medication report form shall be signed by the practicing veterinarian.

(c) The medication report form must be filed by the treating veterinarian not later than post time of the race for which the horse is entered. Any such report is confidential and its content shall not be disclosed except in the course of an investigation of a possible violation of the Commission's regulations or in a proceeding before the Stewards or the Commission, or to the trainer or owner of record at the time of treatment.

(d) A timely and accurate filing of a medication report form that is consistent with the analytical results of a positive test may be used as a mitigating factor in determining the nature and extent, if any, of a rules violation.

3.28: Prohibited Practices

(1) No person may possess or use a drug, substance or medication on the premises of a facility under the jurisdiction of the Commission for which:

- (a) a recognized analytical method has not been developed to detect and confirm the administration of such substance;
- (b) the use of which may endanger the health and welfare of the horse or endanger the safety of the driver;
- (c) the use of which may adversely affect the integrity of racing; or
- (d) no generally-accepted use in equine care exists.

(2) Prohibited Substances and Methods.

(a) The substances and methods listed in the annexed Prohibited List may not be used at any place or time, and may not be possessed on the premises of a racing or training facility under the jurisdiction of the Commission, except as a restricted therapeutic use.

(b) Restricted Therapeutic Use. A limited number of medication on the Prohibited List shall be exempted when the administration occurs in compliance with the annexed Required Conditions for Restricted Therapeutic Use:

1. Report When Sampled means the administration of the substance must be reported to the Commission when the horse is next sampled, if the horse is sampled within 24 hours after the administration;
2. Pre-file Treatment Plan means that if the Commission where the horse is located requires the filing of treatment plans, then a treatment plan for the substance must be filed by the time of administration in a manner approved by such Commission;
3. Written Approval from Commission means the Commission has granted written approval of a written treatment plan before the administration of the substance;
4. Emergency Use (report) means the substance had to be administered due to an acute emergency involving the life or health of the horse, provided the emergency use is reported to the Commission as soon as practicable after the treatment occurs;
5. Prescribed by Veterinarian means the substance has been prescribed by an attending veterinarian, in compliance with ARCI O11-010 *Veterinary Practices*, and recorded in the veterinary records in the manner required by the Commission;
6. Report Treatment means the treatment must be reported to the Commission by the trainer at the time of administration to provide the Commission with information for the Veterinarian's List. The trainer may delegate this responsibility to the treating veterinarian, who shall make the report when so designated; and

3.28: continued

7. Other Limitations means additional requirements that apply, such as a substance may be used in only fillies or mares or a horse that is administered a substance shall be reported immediately to the Commission and placed on the Veterinarian's List for a specific minimum period of time. The use of the substance must comply with other applicable rules of the Commission.

(c) No person shall at any time administer any other doping agent to a horse except pursuant to a valid therapeutic, evidence-based treatment plan.

1. Other doping agent means a substance that is not listed in the annexed Prohibited List, has a pharmacologic potential to alter materially the performance of a horse, has no generally accepted medical use in the horse when treated, and is:

a. capable at any time of causing an action or effect, or both, within one or more of the blood, cardiovascular, digestive, endocrine, immune, musculoskeletal, nervous, reproductive, respiratory, or urinary mammalian body systems; including, but not limited to, endocrine secretions and their synthetic counterparts, masking agents, oxygen carriers, and agents that directly or indirectly affect or manipulate gene expression; but

b. not a substance that is considered to have no effect on the physiology of a horse except to improve nutrition or treat or prevent infections or parasite infestations.

2. The Commission may publish advisory warnings that certain substances or administrations may constitute a violation of 205 CMR 3.28.

3. Therapeutic, evidence-based treatment plan means a planned course of treatment written and prescribed by an attending veterinarian before the horse is treated that:

a. describes the medical need of the horse for the treatment, the evidence-based scientific or clinical justification for using the doping agent, and a determination that recognized therapeutic alternates do not exist; and

b. complies with ARCI 011-010 *Veterinary Practices*, meets the standards of veterinary practice of the jurisdiction, and is developed in good faith to treat a medical need of the horse.

4. Such plans shall not authorize the possession of a doping agent on the premises of a racing or training facility under the jurisdiction of the Commission.

(3) The possession and/or use of the following substances or of blood doping agents, including but not limited to those listed in 205 CMR 3.28(3)(a) through (j), on the premises of a facility under the jurisdiction of the Commission is forbidden:

(a) Aminoimidazole carboxamide ribonucleotide (AICAR);

(b) Darbepoetin;

(c) Equine Growth Hormone;

(d) Erythropoietin;

(e) Hemopure ®;

(f) Myo-Inositol Trispyrophosphate (ITPP);

(g) Oxyglobin®;

(h) Thymosin beta;

(i) Venoms or derivatives thereof;

(j) Thymosin beta.

(4) The use of Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy shall not be permitted unless the following conditions are met:

(a) Any Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy machine, whether in operating condition or not, must be registered with and approved by the Commission or its designee before such machine is brought to or possessed on any racetrack or training center within the jurisdiction of the Commission;

(b) The use of Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy within the jurisdiction:

1. shall be limited to veterinarians licensed to practice by the Commission;

2. may only be performed with machines that are registered and approved for use by the Commission; and

3. used at a previously-disclosed location that is approved by the Commission must be reported within 24 hours prior to treatment on the prescribed form to the official veterinarian.

3.28: continued

- (c) Any treated horse shall not be permitted to race or breeze qualify for a minimum of ten days following treatment;
- (d) Any horse treated with Extracorporeal Shock Wave Therapy or Radial Pulse Wave Therapy shall be added to a list of ineligible horses. This list shall be kept in the race office and accessible to the jockeys drivers and/or their agents during normal business hours and be made available to other regulatory jurisdictions.
- (e) A horse that receives any such treatment without full compliance with 205 CMR 3.28(4) and similar rules in any other jurisdiction in which the horse was treated shall be placed on the Steward's List.
- (f) Any person participating in the use of ESWT and/or the possession of ESWT machines in violation of this rule shall be considered to have committed a Prohibited Practice and is subject to a Class A Penalty.

(5) The use of a nasogastric tube (a tube longer than six inches) for the administration of any substance within 24 hours prior to the post time of the race in which the horse is entered is prohibited without the prior permission of the official veterinarian or his or her designee.

Annex I
Prohibited Substances and Prohibited Methods
Prohibited Substances

All substances in the following categories shall be strictly prohibited unless otherwise provided in accordance with 205 CMR ~~3.00 4.00: Rules of Harness Horse Racing~~. Any reference to substances in ~~205 CMR 3.28(5) Annex I~~ does not alter the requirements for testing concentrations in race day samples. Nothing in this list shall alter the requirements of post-race testing.

- (a) Non-approved Substances. Any pharmacologic substance that is not approved by any governmental regulatory health authority for human or veterinary use within the jurisdiction is prohibited. This prohibition includes drugs under pre-clinical or clinical development, discontinued drugs, and designer drugs (a synthetic analog of a drug that has been altered in a manner that may reduce its detection) but does not include vitamins, herbs and supplements for nutritional purposes that do not contain any other prohibited substance, or the administration of a substance with the prior approval of the Commission in a clinical trial for which an FDA or similar exemption has been obtained.
- (b) Anabolic Agents. Anabolic agents are prohibited.
 1. Anabolic Androgenic Steroids (AAS).
 - 1.1. Exogenous AAS, including:
 - 1-androstenediol (5a-androst-1-ene-3 β ,17 β -diol); 1-androstenedione (5a-androst-1-ene-3,17-dione); bolandiol (estr-4-ene-3 β ,17 β -diol); bolasterone; boldenone; boldione (androsta-1,4-diene-3,17-dione); calusterone; clostebol; danazol ([1,2]oxazolol[4',5':2,3]pregna-4-en-20-yn-17a-ol); dehydrochlormethyltestosterone (4-chloro-17 β -hydroxy-17a-methylandrosta-1,4-dien-3-one); desoxymethyltestosterone (17a-methyl-5a-androst-2-en-17 β -ol); drostanolone; ethylestrenol (19-norpregna-4-en-17a-ol); fluoxymesterone; formebolone; furazabol (17a-methyl[1,2,5]oxadiazolo[3',4':2,3]-5a-androstan-17 β -ol); gestrinone; 4-hydroxytestosterone (4,17 β -dihydroxyandrost-4-en-3-one); mestanolone; mesterolone; metandienone (17 β -hydroxy-17a-methylandrosta-1,4-dien-3-one); metenolone; methandriol; methasterone (17 β -hydroxy-2a,17a-dimethyl-5a-androstan-3-one); methyldienolone (17 β -hydroxy-17a-methylestra-4,9-dien-3-one); methyl-1-testosterone (17 β -hydroxy-17a-methyl-5a-androst-1-en-3-one); methylnortestosterone (17 β -hydroxy-17a-methylestr-4-en-3-one); methyltestosterone; metribolone (methyltrienolone, 17 β -hydroxy-17a-methylestra-4,9,11-trien-3-one); mibolerone; nandrolone; 19-norandrostenedione (estr-4-ene-3,17-dione); norboletone; norclostebol; norethandrolone; oxabolone; oxandrolone; oxymesterone; oxymetholone; prostanazol (17 β -[(tetrahydropyran-2-yl)oxy]-1H-pyrazolo[3,4:2,3]-5a-androstane); quinbolone; stanozolol; stenbolone; 1-testosterone (17 β -hydroxy-5a-androst-1-en-3-one); tetrahydrogestrinone (17-hydroxy-18a-homo-19-nor-17a-pregna-4,9,11-trien-3-one); trenbolone (17 β -hydroxyestr-4,9,11-trien-3-one); and other substances with a similar chemical structure or similar biological effect(s).

3.28: continued

1.2. Endogenous AAS or their synthetic esters when administered exogenously: androstenediol (androst-5-ene-3 β ,17 β -diol); androstenedione (androst-4-ene-3,17-dione); dihydrotestosterone(17 β -hydroxy-5 α -androstan-3-one); prasterone (dehydroepiandrosterone, DHEA, 3 β -hydroxyandrost-5-en-17-one); testosterone; and their metabolites and isomers including, but not limited to: 5 α -androstane-3 α ,17 α -diol; 5 α -androstane-3 α ,17 β -diol; 5 α -androstane-3 β ,17 α -diol; 5 α -androstane-3 β ,17 β -diol; sp-androstane-3 α ,17 β -diol, androst-4-ene-3 α ,17 α -diol; androst-4-ene-3 α ,17 β -diol; androst-4-ene-3 β ,17 α -diol; androst-5-ene-3 α ,17 α -diol; androst-5-ene-3 α ,17 β -diol; androst-5-ene-3 β ,17 α -diol; 4-androstenediol (androst-4-ene-3 β ,17 β -diol); 5-androstenedione (androst-5-ene-3,17-dione); androsterone (3 β -hydroxy-5 α -androstan-17-one); epi-dihydrotestosterone; epitestosterone; etiocholanolone; 7 α -hydroxy-DHEA; 7 β -hydroxy-DHEA; 7-keto-DHEA; 19-norandrosterone; 19-noretiocholanolone.

(c) Other Anabolic Agents, Including, but Not Limited to: Clenbuterol, selective androgen receptor modulators (SARMs *e.g.*, andarine and ostarine), ractopamine, tibolone, zeranol, zilpaterol.

(d) Peptide Hormones, Growth Factors and Related Substances. The following substances, and other substances with similar chemical structure or similar biological effect(s), are prohibited:

1. Erythropoietin-Receptor agonists: Erythropoiesis-Stimulating Agents (ESAs) including, *e.g.*, darbepoetin (dEPO); erythropoietins (EPO); EPO-Fc; EPO-mimetic peptides (EMP), *e.g.*, CNTO 530 and peginesatide; and methoxypolyethylene glycol-epoetin beta (CERA); and Non-erythropoietic EPO-Receptor agonists, *e.g.*, ARA-290, asialo EPO and carbamylated EPO;
2. Hypoxia-inducible factor (**HIF**) stabilizers, *e.g.*, cobalt (when found in excess of regulatory authority limits) and roxadustat (FG-4592); and **HIF** activators, (*e.g.*, argon, xenon);
3. Chorionic Gonadotropin (CG) and Luteinizing Hormone (LH) and their releasing factors, in males;
4. Corticotrophins and their releasing factors;
5. Growth Hormone (GH) and its releasing factors including Growth Hormone Releasing Hormone (**GHRH**) and its analogues, *e.g.*, CJC-1295, sennorelin and tesamorelin; Growth Hormone Secretagogues (GHS), *e.g.*, ghrelin and ghrelin mimetics, *e.g.*, anamorelin and ipamorelin; and GB-Releasing Peptides (GHRPs), *e.g.*, alexamorelin, GHRP-6, hexarelin and pralmorelin (GHRP-2);
6. Venoms and toxins including, but not limited to, venoms and toxins from sources such as snails, snakes, frogs, and bees as well as their synthetic analogues such as ziconotide.
7. In addition, the following growth factors are prohibited: Fibroblast Growth Factors (FGFs), Hepatocyte Growth Factor (HGF), Insulin-like Growth Factor-I (IGF-1) and its analogues, Mechano Growth Factors (MGFs), Platelet-Derived Growth Factor (PDGF), Vascular-Endothelial Growth Factor (VEGF) and any other growth factor affecting muscle, tendon or ligament protein synthesis/degradation, vascularization, energy utilization, regenerative capacity or fiber type switching.

(e) Beta-2 Agonists. All beta-2 agonists, including all optical isomers (*i.e.*, d- and l-) where relevant, are prohibited.

(f) Hormone and Metabolic Modulators. The following are prohibited:

1. Aromatase inhibitors including, but not limited to: aminoglutethimide, anastrozole, androsta-1,4,6-triene-3,17-dione (androstatrienedione), 4-androstene-3,6,17-trione (6-oxo), exemestane, fonnestane, letrozole, testolactone;
2. Selective estrogen receptor modulators (SERMs) including, but not limited to: raloxifene, tamoxifen, toremifene;
3. Other anti-estrogenic substances including, but not limited to: clomiphene, cyclofenil, fulvestrant;
4. Agents modifying myostatin function(s) including, but not limited to: myostatin inhibitors;
5. Metabolic modulators:
 - 5.1. Activators of the AMP-activated protein kinase (AMPK), *e.g.*, AICAR, and Peroxisome Proliferator Activated Receptor 6 (PPAR6) agonists (*e.g.*, GW 1516);
 - 5.2. Insulins;
 - 5.3. Trimetazidine; and

3.28: continued

5.4. Thyroxine and thyroid modulators/hormones including, but not limited to, those containing T4 (tetraiodothyronine/thyroxine), T3 (triiodothyronine), or combinations thereof.

(g) Diuretics and Other Masking Agents. The following diuretics and masking agents are prohibited, as are other substances with similar chemical structure or similar biological effect(s): acetazolamide, amiloride, bumetanide, canrenone, chlorthalidone, desmopressin, etacrynic acid, indapamide, metolazone, plasma expanders (e.g., glycerol; intravenous administration of albumin, dextran, hydroxyethyl starch and mannitol), probenecid, spironolactone, thiazides (e.g., bendroflumethiazide, chlorothiazide, hydrochlorothiazide), torsemide, triamterene, and vasopressin receptor antagonists or vaptans (e.g., tolvaptan).

Furosemide and trichlormethiazide may be administered only in a manner permitted by other rules of the Commission.

Prohibited Methods

(6) Manipulation of Blood and Blood Components. The following are prohibited:

- (a) The administration or reintroduction of any quantity of autologous, allogenic (homologous) or heterologous blood or red blood cell products of any origin into the circulatory system.
- (b) Artificially enhancing the uptake, transport or delivery of oxygen including, but not limited to: perfluorochemicals, eflaproxiral (RSR13) and modified hemoglobin products (e.g., hemoglobin-based blood substitutes, microencapsulated hemoglobin products), excluding supplemental oxygen.
- (c) Any form of intravascular manipulation of the blood or blood components by physical or chemical means.

(7) Chemical and Physical Manipulation. Tampering, or attempting to tamper, in order to alter the integrity and validity of samples collected by the Commission, is prohibited. These methods include, but are not limited to, urine substitution or adulteration (e.g., proteases).

(8) Gene Doping. The following, with the potential to enhance sport performance, are prohibited:

- (a) The transfer of polymers of nucleic acids or nucleic acid analogues.
- (b) The use of normal or genetically modified hematopoietic cells.

Required Conditions for Restricted Therapeutic Use							
Prohibited Substance	Report When Sampled	Pre-File Treatment Plan	Written Approval from Commission	Emergency Use (report)	Prescribed by Veterinarian	Report Treatment	Other Limitations
Adrenocorticotrophic Hormone (ACTH)		x			x		
Albuterol					x		
Altrenogest					x		fillies/mares only
Autologous Conditioned Plasma (IRAP)	x				x		
Blood Replacements	x			x	x		
Boldenone		x			x	x	6 month Vet List
Clenbuterol		x			x		
Chorionic Gonadotropin		x	x-1		x	x	60 day Vet List
Furosemide	x				x		
Luteinizing Hormone		x	x-1		x	x	60 day Vet List
Mesenchymal Stem Cells	x				x	x	
Nandrolone		x			x	x	6 month Vet List
Nucleic Polymer Transfers		x	x		x	x	
Platelet Rich Plasma (PRP)	x				x		
Stanozolol		x			x	x	6 month Vet List
S0 (not FDA-approved)			x-2		x		
Testosterone		x			x	x	6 month Vet List
Thyroxine (T4)		x	x-3		x		
Trichlormethiazide	x				x		
Other Diuretics	x			x	x		

x-1: The approved treatment plan must show a specific treatment of a specific individual horse for an undescended testicle condition.

x-2: The approved treatment plan must show: (A) the substance has a generally accepted veterinary use; (B) the treatment provides a significant health benefit for the horse; (C) there is no reasonable therapeutic alternative; and (D) the use of the substance is highly unlikely to produce any additional enhancement of performance beyond what might be anticipated by a return to the horse's normal state of health, not exceeding the level of performance of the horse prior to the onset of the horse's medical condition.

x-3: The approved treatment plan must show: (A) the thyroxine is prescribed to a specific individual horse for a specific period of time; (B) the diagnosis and basis for prescribing such drug, the dosage, and the estimated last administration date; and (C) that any container of such drug on licensed premises shall be labeled with the foregoing information and contain no more thyroxine than for the treatment of the specific individual horse, as prescribed.

3.29: Medications and Prohibited Substances

(1) Aggravating and Mitigating Factors. Upon a finding of a violation of 205 CMR 3.29, the judges shall consider the classification level of the violation as listed at the time of the violation in the *Uniform Classification Guidelines for Foreign Substances* as promulgated by the Association of Racing Commissioners International (ARCI) and impose penalties and disciplinary measures consistent with the recommendations contained therein. The judges shall also consult with the official veterinarian, laboratory director or other individuals to determine the seriousness of the laboratory finding or the medication violation. All medication and drug violations shall be investigated and reviewed on a case by case basis. Extenuating factors include, but are not limited to:

- (a) The past record of the trainer, veterinarian and owner in drug cases;
- (b) The potential of the drug(s) to influence a horse's racing performance;
- (c) The legal availability of the drug;
- (d) Whether there is reason to believe the responsible party knew of the administration of the drug or intentionally administered the drug;
- (e) The steps taken by the trainer to safeguard the horse;
- (f) The probability of environmental contamination or inadvertent exposure due to human drug use;
- (g) The purse of the race;
- (h) Whether the drug found was one for which the horse was receiving a treatment as determined by the Medication Report Form;
- (i) Whether there was any suspicious betting pattern in the race; and
- (j) Whether the licensed trainer was acting under the advice of a licensed veterinarian.

As a result of the investigation, there may be mitigating circumstances for which a lesser or no penalty is appropriate for the licensee and aggravating factors, which may increase the penalty beyond the minimum.

(2) Penalties.

- (a) In issuing penalties against individuals found guilty of medication and drug violations, a regulatory distinction shall be made between the detection of therapeutic medications used routinely to treat racehorses and those drugs that have no reason to be found at any concentration in the test sample on race day.
- (b) If a licensed veterinarian is administering or prescribing a drug not listed in the ARCI *Uniform Classification Guidelines for Foreign Substances*, the identity of the drug shall be forwarded to the official veterinarian to be forwarded to the Racing Medication and Testing Consortium for classification.
- (c) Any drug or metabolite thereof found to be presenting a pre- or post-race sample which is not classified in the version of the ARCI *Uniform Classification Guidelines for Foreign Substances* in effect at the time of the violation shall be assumed to be a ARCI Class 1 Drug and the trainer and owner shall be subject to those penalties as set forth in schedule "A" therein unless satisfactorily demonstrated otherwise by the Racing Medication and Testing Consortium, with a penalty category assigned.
- (d) Any licensee of the Commission, including veterinarians, found to be responsible for the improper or intentional administration of any drug resulting in a positive test may, after proper notice and hearing, be subject to the same penalties set forth for the licensed trainer.
- (e) Procedures shall be established to ensure that a licensed trainer is not able to benefit financially during the period for which the individual has been suspended. This includes, but is not limited to, ensuring that horses are not transferred to licensed family members.
- (f) Multiple positive tests for the same medication incurred by a trainer prior to delivery of official notice by the Commission may be treated as a single violation. In the case of a positive test indicating multiple substances found in a single post-race sample, the Stewards may treat each substance found as an individual violation, depending upon the facts and circumstances of the case.

~~(2A) Multiple Medication Violations (MMV). A trainer who receives a penalty for a medication violation based upon a horse testing positive for a Class 1-5 medication with Penalty Class A-C, as provided in the most recent version of the ARCI *Uniform Classification Guidelines for Foreign Substances*, or similar state regulatory guidelines, shall be assigned points as follows:~~

3.29: continued

Penalty Class	Points if Controlled-Therapeutic Substance	Points if Non-controlled Substance
Class A	N/A	6
Class B	2	4
Class C	½ for first violation with an additional ½ point for each additional violation within 365 days ⁴	one for first violation with an additional ½ point for each additional violation within 365 days
Class D	0	0

⁴ Points for NSAID violations only apply when the primary threshold of the NSAID is exceeded. Points are not to be separately assigned for a stacking violation.

If the Stewards or Commission determine that the violation is due to environmental contamination, they may assign lesser or no points against the trainer based upon the specific facts of the case.

The points assigned to a medication violation by the Stewards' or Commission's Ruling shall be included in the ARCI official database. The ARCI shall record points consistent with Section 13(a) including, when appropriate, a designation that points have been suspended for the medication violation. Points assigned by such regulatory ruling shall reflect, in the case of multiple positive tests as described in 205 CMR 6.29(3)(d), whether they constitute a single violation. The Stewards' or Commission's Ruling shall be posted on the official website of the Commission and within the official database of the Association of Racing Commissioners International. If an appeal is pending, that fact shall be noted in such Ruling. No points shall be applied until a final adjudication of the enforcement of any such violation.

A trainer's cumulative points for violations in all racing jurisdictions shall be maintained by the ARCI. Once all appeals are waived or exhausted, the points shall immediately become part of the trainer's official ARCI record and shall be considered by the Commission in its determination to subject the trainer to the mandatory enhanced penalties by the Stewards or Commission as provided in 205 CMR 3.00.

Multiple positive tests for the same medication incurred by a trainer prior to delivery of official notice by the Commission may be treated as a single violation. In the case of a positive test indicating multiple substances found in a single post-race sample, the Stewards may treat each substance found as an individual violation for which points will be assigned, depending upon the facts and circumstances of the case.

The official ARCI record and/or USTA record shall be used to advise the Stewards or Commission of a trainer's past record of violations and cumulative points. Nothing in 205 CMR 3.00 shall be construed to confer upon a licensed trainer the right to appeal a violation for which all remedies have been exhausted or for which the appeal time has expired as provided by applicable law.

The Stewards or Commission shall consider all points for violations in all racing jurisdictions as contained in the trainer's official ARCI record when determining whether the mandatory enhancements provided in 205 CMR 3.00 shall be imposed.

In addition to the penalty for the underlying offense, the following enhancements shall be imposed upon a licensed trainer based upon the cumulative points contained in his or her official ARCI record:

Points	Suspension in Days
5-5.5	15 to 30
6-8.5	30 to 60
9-10.5	90 to 180
11 or more	180 to 360

~~3.29:—continued~~

~~MMV penalties are not a substitute for the current penalty system and are intended to be an additional uniform penalty when the licensee:~~

~~Has had more than one medication violation for the relevant time period, and~~

~~2.—Exceeds the permissible number of points.~~

~~The Stewards and Commission shall consider aggravating and mitigating circumstances, including the trainer's prior record for medication violations, when determining the appropriate penalty for the underlying offense. The MMP is intended to be a separate and additional penalty for a pattern of violations.~~

~~The suspension periods as provided in Section 13(g) shall run consecutive to any suspension imposed for the underlying offense.~~

~~The Stewards' or Commission's Ruling shall distinguish between the penalty for the underlying offense and any enhancement based upon a Steward or Commission review of the trainer's cumulative points and regulatory record, which may be considered an aggravating factor in a case.~~

~~Points shall expire as follows:~~

Penalty Classification	Time to Expire
A	three years
B	two years
C	one year

~~In the case of a medication violation that results in a suspension, any points assessed expire on the anniversary date of the date the suspension is completed.~~

(3) Medication Restrictions.

(a) A finding by the Commission approved laboratory of a prohibited drug, chemical or other substance in a test specimen of a horse is *prima facie* evidence that the prohibited drug, chemical or other substance was administered to the horse and, in the case of a post-race test, was present in the horse's body while it was participating in a race. Prohibited substances include:

1. Drugs or medications for which no acceptable threshold concentration has been established;
2. Controlled therapeutic medications in excess of established threshold concentrations or administration within the restricted time period as set forth in the version of the ARCI Controlled Therapeutic Medication Schedule in effect at the time of the violation;
3. Substances present in the horse in excess of concentrations at which such substances could occur naturally; and
4. Substances foreign to a horse at concentrations that cause interference with testing procedures.

(b) Except as otherwise provided by 205 CMR 3.00, a person may not administer or cause to be administered by any means to a horse a prohibited drug, medication, chemical or other substance, including any restricted medication pursuant to 205 CMR 3.00 during the 24-hour period before post time for the race in which the horse is entered.

(4) Medical Labeling.

(a) No person on association grounds where horses are lodged or kept, excluding licensed veterinarians, shall have in or upon association grounds which that person occupies or has the right to occupy, or in that person's personal property or effects or vehicle in that person's care, custody or control, a drug, medication, chemical, foreign substance or other substance that is prohibited in a horse on a race day unless the product is labeled in accordance with 205 CMR 3.29(4).

(b) Any drug or medication which is used or kept on association grounds and which, by federal or state law, requires a prescription must have been validly prescribed by a duly licensed veterinarian, and in compliance with the applicable state statutes. All such allowable medications must have a prescription label which is securely attached and clearly ascribed to show the following:



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 3.00**, specifically, **205 CMR 3.02: Definitions**; **205 CMR 3.28: Prohibited Practices**; **205 CMR 3.29: Medications and Prohibited Substances**. A public hearing was held on May 5, 2026, discussing these proposed regulations.

These amendments apply directly to the regulation of licensees conducting or participating in harness horse racing in the Commonwealth. Accordingly, these proposed regulations are not likely to have a negative impact on small businesses. These regulations are authorized by G.L. c. 128A, §§ 9 and 9B.

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 regulations do not impose any reporting requirements for small businesses.

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

These regulations 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 design standards are important as they encourage uniformity for any individuals licensed by the Massachusetts Gaming Commission to conduct or participate in harness horse racing in the Commonwealth of Massachusetts.



Massachusetts Gaming Commission

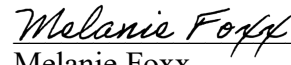
5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

These regulations are unlikely to deter or encourage the formation of new businesses in the Commonwealth at this time.

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

To the extent that horsemen and barns are considered small businesses, there is a possibility that the regulation amendments could impact small businesses, however, these regulations are not likely to adversely impact small businesses.

Massachusetts Gaming Commission
By:



Melanie Foxx
Associate General Counsel

Dated: May 21, 2026



Massachusetts Gaming Commission