



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 22, 2025 | 10:00 a.m.
VIA REMOTE ACCESS: 1-646-741-5292
MEETING ID/ PARTICIPANT CODE: 111 538 4728
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 - #554

1. Call to Order – Jordan Maynard, Chair

2. Meeting Minutes

- | | |
|---------------------|-------------|
| a. January 19, 2023 | VOTE |
| b. October 29, 2024 | VOTE |
| c. April 24, 2025 | VOTE |
| d. May 1, 2025 | VOTE |

3. Legislative Update – Commissioner Brad Hill

4. Administrative Update – Dean Serpa, Executive Director



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5. Community Affairs Division – Joe Delaney, Division Chief of Community Affairs
 - a. MGM Springfield Quarterly Report – Gus Kim, VP & Legal Counsel; Arlen Carballo, VO of Finance; Beth Ward, Director of Public Affairs; Dam Miller, Director of Compliance
 - b. Encore Boston Harbor Quarterly Report – Juliana Catanzariti, Executive Director, Legal; Tom Coffey, Executive Director of Security and Investigations
 - c. Plainridge Park Casino Quarterly Report – North Grounsell, General Manager; Kathy Lucas, Vice President of Human Resources
6. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. Springfield Youth Health Surveys: Understanding Youth Gambling Behavior in Springfield – Kathleen Szegda, PhD, MPH, MS, Senior Director of Community Research and Evaluation, Public Health Institute of Western Massachusetts
7. Discussion of Prediction Markets - Justin Stempeck, Deputy General Counsel; Carrie Torrissi, Chief of the Sports Wagering Division
8. Discussion of Sports Wagering Advertising Research: Saturation Prohibitions in the US and Abroad – Judith Young, Associate General Counsel; Justin Stempeck, Deputy General Counsel; Carrie Torrissi, Chief of the Sports Wagering Division
9. Finance – Derek Lennon, Chief Financial and Accounting Officer
 - a. 3rd Quarter Budget Update – John Scully, Finance and Budget Office Manager
10. Investigations & Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
 - a. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee FBG Enterprises Opco, LLC, d/b/a Fanatics Betting and Gaming and discussion regarding next steps. Alleged noncompliance relates to offering wagering on unauthorized event in violation of 205 CMR 247.01, 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog – Nathaniel Kennedy, Enforcement Counsel



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- b. Review of the IEB's Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2) regarding noncompliance with permissible sports wagering offerings by Category 3 Sports Wagering Licensee FBG Enterprises Opco, LLC, d/b/a Fanatics Betting and Gaming – Nathaniel Kennedy, Enforcement Counsel; Kathleen Kramer, Chief Enforcement Counsel
- c. Review of the IEB's Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2) regarding noncompliance with permissible sports wagering offerings by Temporary Category 3 Sports Wagering Licensee Betfair Interactive US, LLC, doing business as FanDuel – Nathaniel Kennedy, Enforcement Counsel; Kathleen Kramer, Chief Enforcement Counsel
- d. Review of the IEB's Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance involving marketing to excluded individuals by Penn Sports Interactive- Zac Mercer, Sr. Enforcement Counsel
- e. Briefing on noncompliance related to Temporary Category 3 Sports Wagering Operator, Crown MA Gaming LLC, d/b/a DraftKings, and discussion regarding next steps. Alleged noncompliance relates to wagers on an impermissible market in violation of G.L. 23N, § 3, and 205 CMR 247.01(2)(a)(1)- Zac Mercer, Sr. Enforcement Counsel
- f. **Review of the IEB's Recommendation of Assessment of a Civil Administrative Penalty Pursuant to 205 CMR 232.02(2) regarding noncompliance with permissible sports wagering offerings by BetMGM, LLC. – Diandra Franks, Enforcement Counsel; Kathleen Kramer, Chief Enforcement Counsel/Assistant Director, IEB; Caitlin Monahan, Director, IEB**

11. Sports Wagering Division – Carrie Torrissi, Division Chief, Sports Wagering

- a. Update to House Rules
 - I. Penn Sports Interactive **VOTE**
 - II. Fanatics **VOTE**
- b. FanDuel Request for Waiver from Reporting Gender Information Required by 205 CMR 239.04(6) – Carrie Torrissi, Chief of Sports Wagering Division; Mark Vander Linden, Director of Research and Responsible Gaming; Bonnie Andrews, Research Manager; Justin Stempeck, Deputy General Counsel **VOTE**
- c. Ballys 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) – Carrie Torrissi, Chief of Sports Wagering Division; Cristian



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Taveras, Gaming Technical Compliance Manager; Kevin Gauvreau, Acting
Director of IT Services **VOTE**

I. Executive Session **VOTE**

The Commission anticipates that it will convene in an Executive Session in conjunction with its review of Ballys' methods of KYC in accordance with G.L. c. 30A, § 21(a)(7) and G. L. c. 4, § 7(26)(n) 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, and the public discussion or disclosure of which is likely to jeopardize public safety or cyber security.

- d. BetMGM 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) – Carrie Torrisi, Chief of Sports Wagering Division; Cristian Taveras, Gaming Technical Compliance Manager; Kevin Gauvreau, Acting Director of IT Services **VOTE**

i. Executive Session **VOTE**

The Commission anticipates that it will convene in an Executive Session in conjunction with its review of BetMGM's methods of KYC in accordance with G.L. c. 30A, § 21(a)(7) and G. L. c. 4, § 7(26)(n) 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, and the public discussion or disclosure of which is likely to jeopardize public safety or cyber security.

12. Executive Session Meeting Minutes

a. Executive Session **VOTE**

The Commission anticipates that it will meet in an executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the intended purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(7) and G.L. c. 4, § 7(26)(n): **June 6, 2024**; G.L. c. 30A, § 21(a)(7) and G.L. c. 23K, § 21(a)(7): **February 24, 2025 at 11:11 A.M. and 11:33 A.M. and March 11, 2025 at 12:35 P.M.**; G.L. c. 30A, § 21(a)(3), (4), (6) and (7); G.L. c. 4, § 7(26)(f) and (n); and G.L. c. 23N, § 6(i): **February 24, 2025 at 1:03 P.M.**; and G.L. c. 30A, § 21(a)(4) and (7); and G.L. c. 23K, § 21(a)(7): **March 11, 2025 at 11:18 A.M.**

- | | | |
|------|------------------------------|-------------|
| I. | June 6, 2024 | VOTE |
| II. | February 24, 2025 at 11:11AM | VOTE |
| III. | February 24, 2025 at 11:33AM | VOTE |
| IV. | February 24, 2025 at 1:03PM | VOTE |
| V. | Mark 11, 2025 at 11:18AM | VOTE |
| VI. | March 11, 2025 at 12:35PM | VOTE |



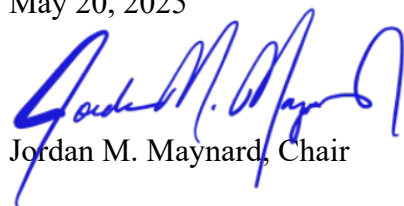
Massachusetts Gaming Commission

13. Commissioner Updates

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

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: May 20, 2025 | 10:00 a.m. EST | **REVISED 5/20/25 @ 11:00AM**

May 20, 2025



Jordan M. Maynard, Chair

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



Massachusetts Gaming Commission

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Massachusetts Gaming Commission Meeting Minutes

Date/Time: January 19, 2023, 10:00 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 1431 1966

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

Commissioners Present:

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

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

Chair Judd-Stein called to order the 425th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

2. [Opening Remarks](#) (01:19)

Chair Judd-Stein stated that in the previous meeting, the Commission confirmed that each applicant had submitted all supplemental information requested by the Commission. She stated that the Commission would now assess whether the supplemental information satisfied each request or whether it would be appropriate to impose conditions on licensure.

3. [Evaluation Process](#) (03:20)

Commissioner O'Brien asked if Betr Holdings, Inc. d/b/a Betr ("Betr") had submitted supplemental information regarding an answer to the cryptocurrency litigation. Chief Administrative Officer Crystal Beauchemin stated that she confirmed with Betr representatives that no answer had been filed.

The Commission reached a consensus that the supplemental information submitted by Bally's Interactive, LLC ("Bally's"), Betfair Interactive US, LLC d/b/a FanDuel ("FanDuel"), Betr, Crown MA Gaming, LLC d/b/a DraftKings ("DraftKings"), Digital Gaming Corporation, USA d/b/a Betway ("DGC"), and PointsBet Massachusetts, LLC ("PointsBet") met the Commission's expectations. The Commission reached a consensus that all category three untethered sports wagering applications met the Commission's expectations in their entirety.

Chair Judd-Stein stated that this meeting was the Commission's opportunity to review the pool of applicants against each other to determine which applicant would maximize benefits and minimize harm to the Commonwealth. Commissioner O'Brien stated that she may have further questions regarding RSM US, LLP's ("RSM") financial suitability reports that would be appropriate for executive session. Chair Judd-Stein noted that all six applicants provided variation in their application. She noted that Betr had a different sports wagering model that offered innovation.

Commissioner O'Brien stated that the portions of the application that were most important to her were responsible gaming, suitability, and economic impact. She stated that she was conflicted by the way some innovation ideas conflicted with responsible gaming. She expressed that she was struck by the commitment to jobs being produced in the Commonwealth and noted that DraftKings was already headquartered in Massachusetts.

Commissioner O'Brien expressed concern that platform bets based on impulse had not been largely studied. She stated that while Betr had great plans to protect vulnerable populations, she had responsible gaming concerns related to their platform. She stated that the company's image was tied to a sports professional, which was not a typical suitability background. She expressed concerns regarding DGC's readiness to launch in Massachusetts. Chair Judd-Stein noted that no qualifier had gone through a full durable suitability process at this time. Chair Judd-Stein noted that even the newcomers to the sports wagering industry had hired experienced leadership.

Commissioner Skinner stated that in her review, she focused on diversity in the applicants' workforce and suppliers, as well as the applicants' community engagement. She stated that each application demonstrated commitment to increasing diversity. She stated that there was nothing glaringly deficient in any of the applications and expressed that she could not see herself granting a license to one applicant over another. She expressed that based on the Commission's review of the applications, each of the six applicants should be granted a temporary license.

Commissioner Maynard stated that when reviewing applications, he focused on diversity opportunities. He expressed that both the Commonwealth and the applicants would see benefits

from incorporating diversity. He explained that he also focused on the applicants' commitment to collaborate with the Massachusetts Lottery. He stated that he wanted to ensure that there were efforts to mitigate harm to the Lottery. He stated that all applicants had committed to collaboration with the Massachusetts Lottery and noted that Betr had taken an interesting approach.

Commissioner Hill stated that in his review, he focused on the applicants' commitment to community engagement. He expressed that he was happy with the community partnerships each of the applicants had in other jurisdictions. He also noted that he was impressed by the applicants' responses regarding responsible gaming and diversity.

Chair Judd-Stein noted that each applicant was responsive when more information was requested by the Commission. Commissioner O'Brien expressed concern regarding harm from the industry on vulnerable populations in their early 20s. She stated that all applicants met the minimum criteria, but that she believed there was more room for comparative analysis.

Chair Judd-Stein sought clarification regarding the review process. General Counsel Todd Grossman explained that the criteria the Commission was to review while evaluating the applications were found in the Commission's regulations at 205 CMR 218.06(5) and (6) which he reviewed, including the requirement for suitability, which at this point in the process is a preliminary finding of suitability as compared to the later durable finding of suitability. He reminded the Commission that the ultimate question was whether there is substantial evidence in the record to support a conclusion that the award of a license to a particular applicant would benefit the Commonwealth. He also explained that the Commission could impose conditions on licenses in accordance with 205 CMR 220.

5. [Executive Sessions](#) (1:20:27)

Chair Judd-Stein asked Commissioner O'Brien which topic she would like to discuss in executive session. Commissioner O'Brien stated that she wanted to discuss RSM's financial suitability presentation and relative economic impact for the applicants. General Counsel Grossman stated that this topic was appropriate for executive session in accordance with G.L. c. 23N, § 6(i).

Chair Judd-Stein stated that the Commission anticipated that it would meet in executive session in conjunction with its review of each of the category 3 untethered applications in accordance with G.L. c. 30A, § 21(a)(7) and G.L. c. 23N, § 6(i) to consider information submitted by the applicants in the course of the respective applications for an operator license, as examined by RSM US LLP in the context of any discussed financial metrics, ratios, or associated financial measures, that are a trade secret, competitively-sensitive or proprietary and which if disclosed publicly would place the applicant at a competitive disadvantage.

Commissioner O'Brien moved that the Commission go into executive session for the matters and reasons stated by General Counsel Grossman and the Chair.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

Chair Judd-Stein noted that the public session of the meeting would reconvene after the conclusion of the executive session.

Transcriber's Note: The Commission entered executive session. The Commission returned to the public session of the meeting at [3:37:24](#).

5. [License application determinations by the Commission in accordance with 205 CMR 218.07 relative to the applications submitted by Bally's Interactive, LLC, Betfair Interactive US, LLC \(d/b/a FanDuel\), Betr Holdings, Inc., Crown MA Gaming, LLC \(DraftKings\), Digital Gaming Corporation USA, and PointsBet Massachusetts, LLC.](#) (3:38:16)

Commissioner O'Brien asked if there was a procedural process available should one or more of the seven available licenses not be awarded at this meeting. General Counsel Grossman stated that pursuant to 205 CMR 218.02, the Commission had the ability to set deadlines for the filing of an application, and that the Commission would be able to address any outstanding untethered license through that provision if they chose to accept additional applications.

Chair Judd-Stein stated that each applicant's role was different but individually strong. She asked if all certifications had been submitted as requested for suitability. Executive Director Karen Wells stated that she would have Director of the Investigations and Enforcement Bureau ("IEB") Loretta Lillios answer that question.

The Commission discussed potential conditions to impose upon the temporary licenses. The Commission reached a consensus that the requirement that operators develop and report workforce and supplier diversity goals would be better addressed via regulation. The Commission reached a consensus that the operators' commitment to collaborate with the Massachusetts Lottery would be better addressed via regulation. The Commission determined that any updates regarding suitability matters in other jurisdictions would have to be reported as part of the ongoing suitability process.

General Counsel Grossman stated that the Commission had previously discussed a condition regarding Betr not offering wagering on events where Betr's Founder and President Jake Paul was a fighter, promoter, or other participant.

General Counsel Grossman stated that FanDuel had submitted its daily fantasy sports registration in Massachusetts but had yet to pay its retroactive taxes. He stated that FanDuel was obliged to pay such under a separate body of law and that a condition was not necessary.

General Counsel Grossman stated that DGC's parent company SuperGroup Holdings Inc. ("SGHC") had submitted its attestations and certifications. He stated that SGHC had agreed to a restriction on the transferability of any prospective license if DGC was not able to launch sports wagering operations by March.

General Counsel Grossman noted that PointsBet had pledged not to engage with marketing on college or university campuses in the Commonwealth. Commissioner O'Brien stated that this was a requirement for all operators and that it was included in the draft of 205 CMR 256, which was scheduled for a vote the following day.

Commissioner O'Brien noted that during a prior vote, Caesars Entertainment's temporary license was subjected to a condition that Caesars not advertise at colleges or universities in the Commonwealth. She stated that she wanted to ensure that conditions on all licensees were consistent. General Counsel Grossman stated that when written decisions were drafted, the Commission could strike that condition as it would be addressed in 205 CMR 256.

Commissioner O'Brien asked if the Commission had any recourse should a license be awarded but the licensee does not launch sports wagering operations. General Counsel Grossman stated that the license permits the licensee to engage in an activity, but it is not a mandate. He stated that if this were to occur, it could be addressed during the renewal process. Commissioner Maynard expressed that he would be upset if a licensee received a license only to use it as leverage for the sale of the company. He stated that this would be considered in any decision to grant a transfer or renewal of the license.

Commissioner O'Brien noted that Betr agreed not to offer wagering on combat sports and questioned whether a condition should be added. Commissioner Hill stated that the restriction should be on any event that Mr. Paul was involved with, not just events where Mr. Paul was competing. General Counsel Grossman stated that limitations could not be placed on what leagues wagering is offered on, as it was unclear what league or promotion Mr. Paul would partner with in the future.

In regard to Betr and Mr. Paul or other similar situations, Commissioner Hill inquired as to whether there was a statute or regulation that would allow the Commission to penalize the licensee should a conflict arise. Commissioner Skinner stated that the Commission would need to understand the issue better before it could be regulated. Chair Judd-Stein proposed that these conflicts of interest be addressed by regulation rather than as a condition on Betr's license.

Commissioner Skinner asked if the Commission staff received attestations from SGHC. Director Lillios stated that the Commission received certifications and attestations regarding suitability from SGHC. She stated that all applicants had submitted the required certifications and attestations. General Counsel Grossman reiterated the factors for evaluating the applications set forth in 205 CMR 218.06(5) and (6).

Commissioner O'Brien moved that the Commission find based on the record before it, which includes the application submitted by the applicant, Bally's, including supplemental information as well as information presented to the Commission in its public review of the application which commenced on January 6, 2023, that the applicant Bally's Interactive has shown by substantial evidence that it has satisfied the criteria set forth in G.L. c. 23N as well as 205 CMR 218.06(5) and (6) demonstrating that the award of a license to it would benefit the Commonwealth; second, that it established its qualifications for preliminary suitability in accordance with 205 CMR 215.01(2) and 205 CMR 218.07(1)(a); and third, that granting a license to it as it relates to the other applicants and licensees would maximize the overall benefits and minimize overall harms or risks of harm to the Commonwealth. This would thus make the applicant, Bally's, eligible to pursue a temporary license provided that this approval is subject to the conditions specifically set forth in 205 CMR 220.01. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

Commissioner Hill: *Aye.*

Commissioner Skinner: *Aye.*

Commissioner Maynard: *Aye.*

Chair Judd-Stein: *Aye.*

The motion passed unanimously, 5-0.

Commissioner O'Brien moved that the Commission find based on the record before it, which includes the application submitted by the applicant, Betfair Interactive US, LLC, including supplemental information as well as information presented to the Commission in its public review of the application which commenced on January 6, 2023, that the applicant Betfair Interactive US, LLC has shown by substantial evidence that it has satisfied the criteria set forth in G.L. c. 23N as well as 205 CMR 218.06(5) and (6) demonstrating that the award of a license to it would benefit the Commonwealth; second, that it established its qualifications for preliminary suitability in accordance with 205 CMR 215.01(2) and 205 CMR 218.07(1)(a); and third, that granting a license to it as it relates to the other applicants and licensees would maximize the overall benefits and minimize overall harms or risks of harm to the Commonwealth. This would thus make the applicant, Betfair Interactive US, LLC, eligible to pursue a temporary license provided that this approval is subject to the conditions specifically set forth in 205 CMR 220.01. Commissioner Maynard seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

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

The motion passed unanimously, 5-0.

Commissioner Skinner moved that the Commission find based on the record before it, which includes the application submitted by the applicant, including supplemental information as well as information presented to the Commission in its public review of the application which commenced on January 6, 2023, that the applicant, Betr Holdings, Inc., has shown by substantial evidence that it has satisfied the criteria set forth in G.L. c. 23N as well as 205 CMR 218.06(5) and (6) demonstrating that the award of a license to it would benefit the Commonwealth; second, that it established its qualifications for preliminary suitability in accordance with 205 CMR 215.01(2) and 205 CMR 218.07(1)(a); and third, that granting a license to it as it relates to the other applicants and licensees would maximize the overall benefits and minimize overall harms or risks of harm to the Commonwealth. This would thus make the applicant eligible to pursue a temporary license provided that this approval is subject to the conditions specifically set forth in 205 CMR 220.01. Commissioner Hill seconded the motion.

Before voting, Commissioner O'Brien noted that she was conflicted on this application. She stated that there were both positive and negative aspects in Betr's submissions. She expressed concern about the applicant being tied to a sports celebrity in the vulnerable age group.

Roll call vote:
Commissioner O'Brien: Nay.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Maynard: Aye.
Chair Judd-Stein: Aye.

The motion passed, 4-1.

Commissioner Hill moved that the Commission find based on the record before it, which includes the application submitted by the applicant, including supplemental information as well as information presented to the Commission in its public review of the application which commenced on January 6, 2023, that the applicant, Crown Gaming MA, LLC, has shown by substantial evidence that it has satisfied the criteria set forth in G.L. c. 23N as well as 205 CMR 218.06(5) and (6) demonstrating that the award of a license to it would benefit the Commonwealth; second, that it established its qualifications for preliminary suitability in accordance with 205 CMR 215.01(2) and 205 CMR 218.07(1)(a); and third, that granting a license to it as it relates to the other applicants and licensees would maximize the overall benefits and minimize overall harms or risks of harm to the Commonwealth. This would thus make the applicant eligible to pursue a temporary license provided that this approval is subject to the conditions specifically set forth in 205 CMR 220.01. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

Commissioner Hill: *Aye.*

Commissioner Skinner: *Aye.*

Commissioner Maynard: *Aye.*

Chair Judd-Stein: *Aye.*

The motion passed unanimously, 5-0.

Commissioner Skinner moved that the Commission find based on the record before it, which includes the application submitted by the applicant, including supplemental information as well as information presented to the Commission in its public review of the application which commenced on January 6, 2023, that the applicant, Digital Gaming Corporation, has shown by substantial evidence that it has satisfied the criteria set forth in G.L. c. 23N as well as 205 CMR 218.06(5) and (6) demonstrating that the award of a license to it would benefit the Commonwealth; second, that it established its qualifications for preliminary suitability in accordance with 205 CMR 215.01(2) and 205 CMR 218.07(1)(a); and third, that granting a license to it as it relates to the other applicants and licensees would maximize the overall benefits and minimize overall harms or risks of harm to the Commonwealth. This would thus make the applicant eligible to pursue a temporary license provided that this approval is subject to the conditions specifically set forth in 205 CMR 220.01. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: *Aye.*

Commissioner Hill: *Aye.*

Commissioner Skinner: *Aye.*

Commissioner Maynard: *Aye.*

Chair Judd-Stein: *Aye.*

The motion passed unanimously, 5-0.

Commissioner Maynard moved that the Commission find based on the record before it, which includes the application submitted by the applicant, including supplemental information as well as information presented to the Commission in its public review of the application which commenced on January 6, 2023, that the applicant, PointsBet Massachusetts, LLC, has shown by substantial evidence that it has satisfied the criteria set forth in G.L. c. 23N as well as 205 CMR 218.06(5) and (6) demonstrating that the award of a license to it would benefit the Commonwealth; second, that it established its qualifications for preliminary suitability in accordance with 205 CMR 215.01(2) and 205 CMR 217.07(1)(a); and third, that granting a license to it as it relates to the other applicants and licensees would maximize the overall benefits and minimize overall harms or risks of harm to the Commonwealth. This would thus make the applicant eligible to pursue a temporary license provided that this approval is subject to the

conditions specifically set forth in 205 CMR 220.01. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

The Commission congratulated the applicants who were awarded temporary licenses and thanked the Commission staff for their work.

6. [Other Business](#) (5:08:04)

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

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated January 3, 2023](#)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: October 29, 2024, 1:15 p.m.

Place: Marilyn Rodman Performing Arts Center
One School Street
Foxborough, MA 02035

On October 29, 2024, the Massachusetts Gaming Commission (“Commission”) participated in a discussion highlighting the Commission’s Community Mitigation Fund and the Foxborough Plainville Wrentham Regional Marketing Initiative. To comply with the Massachusetts Open Meeting Law, the discussion was noticed as a public meeting. The meeting was held in person and was not conducted using remote or livestream technology. However, a recording of the meeting was uploaded to MassGaming.com and the Commission’s YouTube channel.

Commissioners Present:

Chair Jordan Maynard
Commissioner Eileen O’Brien
Commissioner Nakisha Skinner

1. [Call to Order](#) (00:06)

Chair Jordan Maynard called to order the 538th Public Meeting of the Massachusetts Gaming Commission (“Commission”). Roll call attendance was conducted, and Commissioners O’Brien and Skinner were present for the meeting.

Chair Maynard stated that this discussion was going to be held as a public meeting due to the presence of more than two Commissioners. He noted that the meeting was not being livestreamed and stated that a recording would be uploaded to the Commission’s website after the meeting. Chair Maynard introduced the attending Commissioners: Commissioner O’Brien and Commissioner Skinner. He noted that Commissioner Hill sent his regards but was unable to attend due to a prior personal engagement.

Chair Maynard then introduced Michael Bobbitt, whom he described as a long-time friend and the leader of the Mass Cultural Council, who works with the highest integrity and the highest enthusiasm to improve the arts in Massachusetts. Chair Maynard highlighted their past collaborations and acknowledged Mr. Bobbitt’s significant work in the arts. Mr. Bobbitt congratulated Chair Maynard on his official appointment as Chair by the Governor. He thanked the Commissioners as well as the Massachusetts Senators and Representatives in attendance for

their support of the creative and cultural sector. Mr. Bobbitt concluded his remarks by providing an overview of the Foxborough Plainville Wrentham Regional Marketing Initiative and introducing Ms. Rachel Benson, Director of Planning and Economic Development in Wrentham.

2. [Overview of Foxborough, Plainville and Wrentham Regional Marketing Initiative](#) (03:48)

Ms. Benson presented an overview of the Regional Marketing Initiative, a collaborative effort between the towns of Plainville, Foxborough, and Wrentham, generously funded by the Commission. She emphasized that the plan aimed to elevate the local economy, drive tourism, and create long-term benefits for the communities. Ms. Benson highlighted the unique assets of each town: Foxborough with Gillette Stadium for sports and entertainment; Wrentham with one of the largest outdoor outlet malls in New England (Wrentham Village Premium Outlets); and Plainville with Plainridge Park Casino offering gaming, racing, and dining. She stated that these destinations together formed a strong regional attraction amplified by the marketing plan. The initiative, started in 2019, was about building a sustainable future through cooperation and shared growth.

Christine Pappas, President of Open the Door Inc., and a destination marketing expert with 35 years of experience, explained the implementation of the marketing strategy. She shared her excitement about the opportunity provided by the Commission's funding, which allowed for the creation of tools like a website and marketing materials to effectively promote the region. She stated that the initial intent in 2019 was to prepare for the FIFA World Cup in 2026. The goal was to boost economic activity in the three towns by driving overnight stays, increasing revenue for businesses and tax revenue for the towns and the Commonwealth.

Ms. Pappas detailed the branding efforts, including the logo, color palette (evocative of New England fall and summer colors), and typography designed to allow for individuality while maintaining balance across the three towns. She explained that the standards were created to ensure consistent use of assets. Ms. Pappas showcased various iterations of the logo with different colors, hashtags, website addresses, and background imagery.

Ms. Pappas reported that initial results show website engagement with 14,000 users in the past three months and over 40,000 users in the previous two fiscal years. Posts and media sharing events and itineraries received the most views. She shared that hotel tax collections in the region have increased from \$1.8 million in FY 2018 to \$2.4 million in FY 2023. She concluded by stating that future plans included targeted advertising campaigns for the holiday season and spring/summer, search engine marketing, geo-fencing, sales strategy implementation targeting tour operators and meeting planners, and continued development of marketing assets.

3. [Panel Discussion](#) (19:41)

Chair Maynard stated that a panel discussion, aimed to showcase a cross-section of small business owners in the region would occur next. He introduced Paige Duncan, an early member of the Regional Marketing Initiative for Foxborough, Plainville, and Wrentham, who was going to moderate the panel. The panelists included Stephen Bradford, VP of Marketing at Plainridge Park Casino; Rob Garrigan, Partner at Union Straw Restaurant; Deb Sundon, representing An

Unlikely Story Bookstore; Allyson Renault, Owner of Ally's Cookies; and Catherine Miller, Executive Director of the Marilyn Rodman Performing Arts Center.

The panel discussed inspirations for starting their businesses, challenges faced (such as the amount of work and unexpected issues), the supportive nature of the local communities, the positive impact of An Unlikely Story on Plainville, the ways in which Plainridge Park Casino engages with the three towns and opportunities for future collaboration, the rewards of running a business in a small town, and initiatives taken by the Performing Arts Center to build a vibrant community.

Ms. Benson explained the vision for the fully realized marketing initiative, including potential for a self-sustaining organization with an executive director to oversee promotion and outreach. She highlighted the challenge of small businesses lacking the time and resources for marketing efforts and suggested future support in areas like web design and marketing.

4. [Discussion and Questions](#) (42:10)

During the question and answer portion of the panel, an audience member inquired about how citizens could best support local businesses. Panelists suggested a combination of word-of-mouth, social media, and highlighting businesses each week, as well as supporting local events. The "shop local" message and its impact on the local economy was emphasized by many panelists. Ms. Renault, from Ally's Cookies, specifically highlighted that hosting events on the common or elsewhere helps draw people in and addresses accessibility/parking challenges that can make it difficult for some people to visit store fronts directly.

Catherine Miller discussed how state funding through the Mass Cultural Council and the Cultural Facilities Fund has been crucial for the Marilyn Rodman Performing Arts Center, enabling significant renovations and an increase in the organization's economic impact. She also highlighted successful local fundraising efforts. Ms. Miller added that the Commission's grant opportunities through the Mass Cultural Council helped local venues like the Performing Arts Center bring in larger acts they may not otherwise be able to afford.

A question was raised by an audience member about coordination for the upcoming Semi-Quincentennial in 2026, noting the expected large crowds anticipated in the Boston area. Ms. Benson confirmed that discussions were beginning on the committee she was a part of and that they were looking for ways to spread activities across the Commonwealth.

In response to a question about which tourism market has seen the most growth (local, regional, national, or international), Ms. Pappas stated that the most growth has been local and regional so far, but efforts were starting to target national and international business, such as tour operators and meeting planners.

Chair Maynard opened the floor to Representative Marcus Vaughn and Senator Paul Feeny for remarks. Representative Vaughn of Wrentham offered thanks to everyone involved, acknowledging the benefits of the Commission and the Mass Cultural Council grants in his district and others.

Senator Feeny praised the collaborative spirit among the towns and the potential for exponential growth through regionalization. He stated that the towns could achieve scale together that individual communities could not. He also highlighted the readiness of the region for major events like the FIFA World Cup in 2026, despite the challenges businesses face. He specifically thanked the Commission and Director Bobbitt for managing funds effectively.

Chair Maynard reiterated the significance of the Community Mitigation Fund, noting that \$670,000 had been given to this specific regional marketing project since 2019 and approximately \$10 million overall from the Fund had been dispersed in recent years for various projects. He emphasized the importance of continued funding from the state to ensure ongoing project success, and thanked Joe Delaney, Lily Wallace and Mary Thurlow from the Community Affairs Division.

5. [Commissioner Updates](#) (1:05:34)

Commissioner Skinner expressed her gratitude to the panelists for sharing their perspectives and stories. She acknowledged the great work being done for the communities by the Community Affairs Division and supported the continued efforts of the community members.

Commissioner O'Brien reiterated the statements made by Commissioner Skinner and Chair Maynard. She expressed that she was really excited to be able to see the progress on the Marilyn Rodman Performing Arts Center and what it is becoming. She added that seeing the Community Mitigation Fund dollars in action and witnessing their ripple effect in the community was really uplifting and one of the best parts of her role as a Commissioner. She thanked the panelists for taking time out of their busy schedules and the representatives for their work on the Hill.

6. [Other Business](#) (1:09:36)

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

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Skinner: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 3-0. Meeting adjourned.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated October 24, 2024



Massachusetts Gaming Commission Meeting Minutes

Date/Time: April 24, 2025, 10:00 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 367 6497

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](#) (00:03)

Interim Chair Maynard called to order the 552nd Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

2. [Meeting Minutes](#) (01:15)

- a. January 10, 2023
- b. July 26, 2024
- c. October 3, 2024

Commissioner Skinner moved to approve the minutes from the January 10, 2023, July 16, 2024, and October 3, 2024 public meetings that are included in the Commissioners' packet, subject to any necessary corrections for typographical errors or other non-material matters. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Abstain.
Chair Maynard: Aye.
The motion passed, 4-0, with 1 abstention.

d. [March 27, 2025](#) (01:59)

Commissioner Skinner moved to approve the minutes from the March 27, 2025 public meeting that are included in the Commissioners' packet, subject to any necessary corrections for typographical errors or other non-material matters. 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.

3. [Legislative Update](#) (02:55)

a. Overview of House Ways and Means FY26 Budget

Commissioner Hill reviewed the budget proposal that was recently put forward by the Massachusetts House of Representatives ("House"). He noted that the payment to cities and towns for local racing tax revenue was funded at the requested level of \$922,824. However, while the budget proposal for FY26 did level fund the Public Health Trust Fund and the Racehorse Development Fund, it did not contain a distribution of funds to the Community Mitigation Fund ("CMF"). Similar to last year, the proposed non-distribution to the CMF is proposed to be a one-year redistribution and does not permanently amend G.L. c. 23K, § 59.

Commissioner Hill noted that in light of this budget proposed by the House for FY26 and its effect on the CMF, the Commission will need to consider whether to (1) spend down the funds that are currently in the CMF account, which would leave about \$2.1 million in the account for FY27 based on the approximate total request of \$25 million, which includes about \$5 million in waivers; (2) grant the amount proposed by the CMF guidelines of approximately \$19 million, which would not include any waivers and which would leave about \$8.8 million in funding for FY27; or (3) reduce funding for FY26 which would leave additional funding for FY27. He noted that the review team is well through the process of reviewing applications so discussion by the Commission on CMF allocations for FY26 is very timely.

Commissioner Hill further noted the importance of this program to the cities and towns which surround the casinos and which use this funding for mitigation purposes but further noted that this is the second year in a row where the budget includes a proposal to not fund the CMF.

Commissioner Brodeur expressed his appreciation for the opportunity to be a part of the CMF review team. He stated that though the program may not be funded in FY26, the Commission would continue to advocate for additional funding in future years. Chair Maynard added that though the Commission may be preparing for a change, he noted the importance of putting the communities first.

4. [Administrative Update](#) (31:45)

Transcriber's note: Discussion of this agenda item occurred after agenda item no. 6(a).

Executive Director Dean Serpa reminded everyone of the public hearing scheduled on Thursday, May 1, 2025 as part of the renewal process for Plainridge Park Casino's category 2 gaming license. The public hearing will be held in person at the Plainville Town Hall in order to gather information and gauge public sentiment relative to the renewal of the license. ED Serpa noted that there has been outreach to stakeholders in the surrounding communities, businesses and the public and further noted that written comments via email are being accepted through May 8, 2025.

5. [Discussion of Process for Annual Review of Executive Director](#) (09:33)

Chair Maynard asked Commissioner O'Brien to begin the discussion on the process for the annual review of the Executive Director. Commissioner O'Brien stated that forms to be used in connection with this process were updated by herself and former Commissioner Bruce Stebbins in 2021. She reviewed the process as proposed by the Human Resources team, which would include completion of a self-evaluation by ED Serpa, written evaluations by all five commissioners, and individual meetings between commissioners and ED Serpa prior to discussion at a public meeting on both the Commission's assessment of the past year and future goals as well as on compensation. As ED Serpa's one year anniversary has just passed, Commissioner O'Brien recommended moving forward with this process with the goal of completion by the end of June so that ED Serpa will be able to concentrate on the staff evaluation process which will begin that month. She proposed that ED Serpa complete his self-evaluation by May 5, 2025 with Commissioner evaluations and individual meetings to take place in May and public meeting discussions to be held towards the end of June.

Both Commissioners Brodeur and Skinner expressed their appreciation of the work that has gone into developing this process as well as the requisite forms. Commissioner Skinner agreed with the proposed timeline but requested that ED Serpa be given some additional time beyond May 5, 2025 to complete a thorough self-evaluation given the tight turnaround. Commissioner O'Brien noted that she also raised that as a potential issue but said that she was informed that ED Serpa had already begun the process and believed the proposed May 5, 2025 date was acceptable. ED Serpa confirmed that he was comfortable with this proposed timeline.

Chair Maynard noted that as things have changed in the past few years in regard to evaluations, he would like to re-evaluate this process next year. However, he agreed to move forward with the proposed process and timeline for this annual review.

6. [Investigations and Enforcement Bureau](#) (18:29)

Chair Maynard turned to Chief of the Licensing Division Kara O'Brien who started by expressing her appreciation of David MacKay, Licensing Manager, on the occasion of his last meeting with the Commission. She noted that he began as a financial investigator before moving into the Licensing Division and touched on a number of his accomplishments. Manager MacKay thanked Chief O'Brien for her kind words.

a. [Encore Boston Harbor's Request for Service Registration Exemptions](#) (21:00)

Manager MacKay presented a request from Encore Boston Harbor ("Encore") for service employee registration exemptions for two new positions. *A memo outlining the proposed request and additional relevant documents are included in the Commissioners' Packet at pages 48 through 59.* The two positions requested for exemption by Encore include: (1) Off Site – Warehouse Driver Attendant, who would be largely involved with handling goods in storage in the warehouse as well as responsible for operating a large transport truck, and (2) Off Site – Warehouse Receiving Attendant, who would be responsible for storage and handling of goods in the warehouse. Manager MacKay stated that though the goods are ultimately intended for the Encore property, neither position will receive, handle or transport gaming-related equipment. He also noted that the Commission previously exempted a position similar to those proposed for exemption today as well as the supervisor to whom these two positions will report. Lastly, Manager MacKay noted that he worked closely with Kara Henson, Director of Talent Acquisition at Encore, to obtain all necessary information.

Commissioner Hill moved that pursuant to 205 CMR 134.03(1)(b), the Commission exempt the positions of Off Site – Warehouse Driver Attendant and Off Site – Warehouse Receiving Attendant within the Warehouse Department at Encore Boston Harbor from the service employee registration requirements as outlined 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.

Subsequent to the Commission's vote, the commissioners also expressed their appreciation for the work of Manager MacKay and wished him the best in his future endeavors. Manager MacKay thanked each commissioner for their well wishes.

7. [Research and Responsible Gaming](#) (33:22)

a. Voluntary Self-Exclusion Program Update

Mark Vander Linden, Director of Research and Responsible Gaming, and Program Manager Long Banh provided an update to the Commission on the Voluntary Self-Exclusion (“VSE”) program. *A copy of the presentation is included in the Commissioners’ Packet at pages 60 through 72.* Director Vander Linden provided background on the VSE program and an overview of key elements of the program. The presentation also covered the reinstatement session requirement at the conclusion of the chosen duration period, which can be completed in person or remotely, and is intended to be informational and educational, not a screening or assessment.

Manager Banh reviewed the materials which are provided to enrollees during the enrollment session, which include a signed copy of the enrollment agreement, a palm card which lists available resources and highlights terms of the VSE agreement, and a business card that provides the individual’s reinstatement eligibility date. He also reviewed data compiled on the VSE program, including the number of yearly enrollments or reinstatements as well as data on forfeitures. Manager Banh stated that he would provide commissioners with the total dollar value of forfeitures since 2023 as requested by Commissioner Skinner.

Director Vander Linden reviewed key findings from the 2018 evaluation of the VSE program which was completed by the Cambridge Health Alliance Division on Addiction. He highlighted that 3/4 of enrollees who completed a follow-up interview enrolled in VSE programs in other states, an important data point considering state by state requirements in the tight New England area. He noted the consideration of a national or regional VSE program and that they continue to consider options in this regard. He stated that the 2025 VSE program evaluation is part of the FY25 research agenda and will touch on many of the same elements in addition to other areas based on changes since 2018. He noted that a Request for Response was posted on April 8, 2025 with responses due by May 23, 2025.

Chair Maynard stated that he would be on board with creation of a VSE program across states. He also stated that he wants to place more of an onus on operators to make sure that individuals who have a problem are truly taken care of and further, to avoid situations where winning a jackpot is the only manner in which an individual is found to be enrolled in the VSE program. Commissioner Skinner agreed with Chair Maynard and stated that she was looking forward to seeing an updated evaluation of the program. Commissioner Brodeur also agreed with the Chair’s remarks and expressed a desire to create better interventions and more regular outreach to avoid such situations which result in forfeitures. Director Vander Linden agreed that they should consider other ways to be more proactive and clearer in communication. Commissioner Skinner added that she is looking forward to the IEB coming before the Commission to discuss ways to improve the casino processes related to enforcement of the VSE program.

b. [GameSense Quarterly Report](#) (1:11:29)

Director Vander Linden introduced the GameSense team who presented their quarterly report for the third quarter of FY2025. The team consisted of Janine Ruggiero, Chief Marketing Officer; Odessa Dwarika, Chief Programs Officer; Amy Gabrila, Director of Player Health; and Anita Pang, GameSense Advisor at Encore Boston Harbor.

Chief Marketing Officer Ruggiero reviewed the agenda for their report. She then reviewed GameSense’s funders as well as specific data highlights for the third quarter. She highlighted a significant jump in interactions and demonstrations due to their unique campaign for Problem Gambling Awareness Month (“PGAM”) in March. Director Gabrila presented GameSense’s Magic Moments as well as their Champion Award winners. Chief Marketing Officer Ruggiero then recapped events held during PGAM at the three casinos as well as the Commission’s Lunch and Learn, followed by Director Gabrila who reviewed some of the new games they have developed, including a slot machine simulator game and bingo game, in an effort to provide patrons with specific information and resources. Chief Programs Officer Dwarika discussed some of the peer support provided by peer support specialists and the Lived Experience Advisory Panel, noting Commissioner Skinner’s attendance at a March meeting of the panel to hear what their respective communities did during PGAM. Chief Programs Officer Dwarika also discussed gambling awareness groups and the presentations that Jodie Nealley, Director of Recovery Services, gave before various Massachusetts peer-run recovery centers. GameSense Advisor Pang presented on inclusive content at Encore Boston Harbor, particularly various efforts to connect with Asian patrons. Chief Marketing Officer Ruggiero concluded the presentation by noting a Lunar New Year activity in February, which resonated well with patrons, as well as by discussing an upcoming campaign for Safe Ride Home at MGM in May/June 2025 based on funding from the CMF.

The commissioners thanked the GameSense team for their presentation.

8. [Commissioner Updates](#) (1:55:50)

After inquiry by Chair Maynard, no commissioner updates were noted.

9. [Other Business](#) (1:55:55)

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

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated April 22, 2025
2. [Commissioners’ Packet](#) from the April 24, 2025 meeting (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: May 1, 2025, 11:00 a.m.

Place: Plainville Town Hall
190 South Street
Plainville MA, 02762

The Commission conducted this public meeting and public hearing in Plainville and did not utilize remote collaboration technology. To ensure an adequate, alternative means of access for any interested member of the public, the meeting was live streamed via [Plainville North TV](#) and [recorded](#).

Commissioners Present:

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

1. [Call to Order](#) (01:25)

Chair Maynard called to order the 550th Public Meeting and the Public Hearing of the Massachusetts Gaming Commission ("Commission") at 11:05am. Roll call attendance was conducted, and Commissioners O'Brien, Hill, and Brodeur were present for the meeting. Chair Maynard stated that Commissioner Skinner was not present but noted that she would review the comments and record in this proceeding prior to the adjudicatory hearing scheduled for May 14, 2025.

The Chair stated that today's meeting had only one agenda item, and it was to offer the public an opportunity to share comments regarding the renewal of the Category 2 gaming license held by Plainville Gaming and Redevelopment, LLC, doing business as Plainridge Park Casino ("PPC"). Chair Maynard emphasized that it would primarily be a listening session for the Commissioners, and no votes or decisions would be made at this time; the goal was to gather information and gauge public sentiment.

2. [Opportunity for Comments](#) (05:35)

- a. Applicant, Plainville Gaming and Redevelopment LLC d/b/a PPC

The Chair recognized Mr. North Grounsell, General Manager of PPC, who prepared a presentation and statement for the Commission. Mr. Grounsell thanked Chair Maynard and the Commissioners. He stated that PPC recognized that licensing within the Commonwealth was a privilege, not a right, and that a lot of trust has been placed in them, which they strive to be worthy of. Mr. Grounsell then introduced Ms. Heidi Yates Akbaba, VP of Finance, to provide a look back over the past five years of operations.

Ms. Yates Akbaba reported recent updates to the property, including new digital signage, rebranding their rewards program to PennPlay in 2023, bringing on the sportsbook, replacing casino carpets, and remodeling the food court to include Wahlburgers restaurant. Ms. Yates Akbaba added that major capital improvements totaled \$25 million dollars, including remodeling the former Flutie's restaurant space into the ESPN Bet sportsbook, the food court renovation, casino carpet, and paddock improvements for harness horseracing participants.

Ms. Yates Akbaba detailed that PPC had generated \$338 million in tax revenue for the Commonwealth, comprising \$276 million in slot tax, \$62 million in racing tax, and \$800,000 in retail sports wagering tax. She stated that PPC contributed \$56 million to charities and honored their Host Community Agreement with the Town of Plainville ("Town") with \$11 million. Ms. Yates Akbaba added that PPC met or exceeded their diversity spend goals over the five year period, surpassing its annual goal of 21% with a total diversity spend of 25%. This included meeting the 12% goal for women spend, surpassing the 6% goal for minority spend at 7%, and surpassing the 3% goal for veteran spend at 5%.

In concluding her presentation, Ms. Yates Akbaba provided data for PPC since becoming the first licensee in Massachusetts in 2015. The property has generated over \$696 million in total tax revenue for the state, \$32 million in capital improvements, over \$1.35 million contributed to charities, a lifetime host community fee of \$23.1 million, and \$3.1 million in host and surrounding community agreements. The racing operation conducted 5,119 races over 52 days annually, resulting in a total payout of \$77 million in purses and nearly \$7.7 billion in handle. She then introduced Mr. Joseph Wenzel, VP of Operations for PPC.

Mr. Wenzel discussed enhancements to the gaming floor. He stated that PPC had reimagined the floor with new product and reinvestment, brought in the sportsbook, and enhanced the gaming experience by removing pandemic-related plastic dividers on the floor. He highlighted collaborative efforts with GameSense to enhance their commitment to responsible gaming.

Ms. Kathy Lucas, VP of Human Resources, reported on the employment and diversity metrics for PPC for the last five years. Ms. Lucas reported that PPC had exceeded diversity and veteran hiring goals and worked to meet goals for women and local hires, returning to pre-Covid numbers. She stated that 62% of employees are Massachusetts residents. She detailed training initiatives provided by PPC, including DEI and Belonging training programs for managers, an emerging leaders program, and culinary apprenticeship programs. She added that a new management leadership program allows managers to cross-train in different departments.

Ms. Lucas stated that PPC was proud to report that employees were eligible for benefits on day one. Employee benefits include a scholarship fund for employees' children (\$165,000 paid out), the PPC Cares program for employees in crisis (\$35,000 spent), tuition reimbursement (\$50,000 for 11 employees), and an English for Speakers of Other Language ("ESOL") program for language skills. Ms. Lucas concluded by stating that PPC had provided over \$125,000 in bonuses to recognize and reward their team members.

Steven Bradford, VP of Marketing, detailed PPC's contributions to local charities and communities. He reported that PPC has supported over 50 charities and communities, including Habitat for Humanity, Lenore's Pantry, Plainville Rotary, and Plainville Lions Club. He added that PPC also hosts seasonal events involving donations for pet supplies, toys, and school supplies. Mr. Bradford also noted the company's 2023 rebrand to Penn Entertainment, the introduction of the Penn Play app, and the 2024 launch of the new ESPN Bet sportsbook venue, which hosts events like broadcasts, watch parties, and appearances by local sports figures.

Mr. Grounsell concluded the presentation by stating they are proud of their record and believe they have lived up to their commitments. He expressed being most proud of the partnerships formed in the community and acknowledged that their achievements would not be possible without their team and the support of the community.

b. [Representatives of Host Community](#) (19:35)

Next, Chair Maynard recognized representatives from the Town of Plainville, starting first with Town Administrator, Brian Noble.

Mr. Noble stated that he was strongly in favor of renewing PPC's license and highlighted the positive relationship between the Town and the casino. He acknowledged that PPC has preserved and revitalized the legacy industry of harness racing, supporting the broader equine and agricultural economy, creating economic opportunity, and preserving critical open space. Mr. Noble expressed his concern about the competitive pressures faced by PPC, particularly from Twin Rivers casino in Rhode Island. Mr. Noble stated that PPC had been operating under significant statutory constraints. He suggested that the state law, G.L. c. 23K, needs to be revisited to ensure fairness, competitiveness, and our continued economic growth as a state. He noted that while statutory reform was a legislative matter, it was important to raise these matters in a public forum to prevent PPC and the region from being at a competitive disadvantage. He concluded by expressing pride in the relationship with Penn National and PPC, describing them as exceptional partners for the Town and for the region.

Brian Kelly, Plainville Select Board Chair, echoed the sentiments expressed by Mr. Noble. He emphasized that PPC was a critical business for the Town and that they couldn't have a better relationship with the casino. Mr. Kelly highlighted that the revenue from the host community agreement was directly responsible for the construction of the new town hall where the public hearing was being held and noted that the revenue pays the bond for the building. He thanked the Commission.

Maggie Clarke, Plainville Select Board Member, offered comments in support of the renewal of PPC's license. She thanked the Commission for holding the meeting in the Plainville Town Hall, noting that this building and the public safety complex stand as visible symbols of the partnership with PPC. She stated that these buildings represented real, tangible progress for Plainville. Ms. Clark stated that she had tried to recall any negative impacts PPC's presence had on the community and noted there had been none from her perspective. She concluded by thanking PPC for being outstanding neighbors to the Town. She stated there were several positive impacts by PPC and thanked the Commission for being present today.

Jeff Johnson, Plainville Select Board Member, spoke in strong support of PPC's license renewal. He stated it had been a great pleasure working with PPC as a tremendous partner to the Town. He emphasized that it was so important for partners like PPC to be encouraged and motivated because of the positive things they do, such as creating jobs, fostering economic vitality, and revitalizing the harness racing industry. Mr. Johnson shared that he initially had concerns about both horse racing and the casino in the area, but noted that his concerns turned out to be poorly founded. He stated that PPC had exceeded every commitment they had made to the Town and did not cause any of the negative impacts that many people feared. He concluded by stating that the Town and the Commonwealth could not have a better partner in PPC.

c. [Representatives of Surrounding Communities](#) (30:11)

Leigh Fontes, CEO of the Attleboro Norton YMCA, stated she was from a surrounding community. She highlighted PPC as a valued community partner who has been supportive of their annual campaign. She mentioned that the casino's general manager, Mr. Grounsell, was on their board. Ms. Fontes emphasized that their partnership and support benefited families, seniors, and the broader community beyond Plainville and thanked the Commission for their time.

Tim Munn, a Wrentham resident, stated he wanted to speak on behalf of the local communities. He noted his involvement with Lions Clubs in Plainville, Rehoboth, and Norfolk. Mr. Munn discussed PPC's support, along with the Standardbred Owners Association, for a Polar Plunge event that raised money for eye research. He noted the casino was an important and consistent supporter and a headline sponsor for this \$50,000 event. He also mentioned living two miles from the casino and hearing from police officers in Rehoboth and Norton who had not heard of negative issues at the casino.

d. [Representatives of Impacted Live Entertainment Venues](#) (35:34)

Chair Maynard noted that the Commission had received a letter from a representative on behalf of the Impacted Live Entertainment Venues ("ILEVs") and that the Commission would take it into consideration. He then inquired if there were any other representatives on behalf of ILEVs present who wished to offer testimony. Seeing and hearing no participants, the Chair moved onto the next agenda item.

3. [Comments by Members of the Public](#) (35:50)

Chair Maynard stated that the Commission would now hear remarks from members of the public who had signed up to provide testimony.

The Chair called Jack Lank, President of the United Way Regional Chamber of Commerce. Mr. Lank stated that his organization served the 16 communities that surround Plainville. Mr. Lank spoke in favor of renewing PPC's license, emphasizing that PPC has been a tremendous community partner for their region since before its opening. He highlighted that PPC had provided jobs for local residents, strengthened the local tax base for neighboring communities, and generated economic activity in the region. He specifically mentioned that local merchants, convenience stores, coffee shops, and restaurants in the area have seen a huge increase in revenue due to casino visitors. He also gave an example of PPC supporting a local vendor right in North Attleboro to refinish their bar stools. Mr. Lank concluded that PPC exemplified a responsible and engaged community partner contributing positively to the economic and social well-being of the region.

Nancy Longobardi, the Secretary & Treasurer for the Standardbred Owners of Massachusetts ("SOM"), spoke in support of PPC's license renewal. Ms. Longobardi stated that the relicensing of PPC had been the force behind the success of their breeding program. She stated that over the last 5 years, they have had 650 resident brood mares and given away over \$12 million in stake race purses. She explained that the SOM's success has also allowed them to make donations to local organizations. She stated that SOM, along with PPC and the Harness Horseman's Association, has made donations to the Standardbred Transition Alliance, which is important for the retraining of standardbreds after their racing career. Ms. Longobardi concluded by emphasizing that relicensing PPC was very important for the continuing success and growth of the program.

Michael Vartabedian, representing the International Association of Machinists ("IAM") Union, spoke strongly in favor of renewing PPC's license. Mr. Vartabedian highlighted that Penn National was more than open and provided neutrality for the union to speak to workers, agreeing to voluntary recognition if they chose to unionize, which he noted does not happen too often. He added that their relationship has evolved over the years into a partnership, which he described as unusual for a company and a union. Mr. Vartabedian emphasized that PPC leadership was extremely respectful to the workers, and that PPC provided good paying union jobs. He mentioned PPC was a partner in the union's charity, Guide Dogs of America. Mr. Vartabedian concluded by encouraging the Commission to renew PPC's license, stressing the hundreds of good paying union jobs at stake and calling PPC a good employer.

Marlene Warner, CEO of the Mass Council on Gaming and Health ("the Council"), provided comments focusing on the strong, long-standing partnership between PPC and the Council, which is involved in responsible gambling initiatives. She praised PPC for being willing to be a "guinea pig" by implementing responsible gambling programs like Play My Way and GameSense, noting they were unusual in the U.S. and that PPC was willing to test them. Ms. Warner highlighted PPC's collaborative approach to the voluntary self-exclusion program, seeking to balance care for patrons with their operational responsibilities. She stated that PPC consistently went way beyond the bare minimum in their commitment to responsible gambling and community support initiatives. She highlighted PPC's pioneering efforts as the first casino in

Massachusetts to train staff in mental health first aid and in “question, persuade, and refer” protocols related to suicidal ideation.

Kim Thomas, from Old Colony Habitat for Humanity, spoke in support of the renewal of PPC’s license. She stated that her organization served 24 communities in Bristol and Norfolk county, which included many surrounding communities. She highlighted PPC's 10-year partnership with Habitat for Humanity, mentioning that they have built homes alongside the casino in Attleboro, Mansfield, Norton, and Taunton, all neighboring communities to Plainville. She noted that PPC's engagement went beyond transactional, describing them as a true community partner invested in the well-being of their neighbors.

Dale Borgevine, a long-time Plainville resident of 67 years and original committee member that supported PPC coming to Plainville, also gave remarks regarding PPC’s renewal. Mr. Borgevine noted that while he initially had mixed feelings about the casino, it turned out well. He emphasized the genuine nature and care shown by the PPC management team, specifically recounting positive personal interactions with Mr. Grounsell and other staff members. Mr. Borgevine concluded by requesting that the Commission renew PPC’s license.

Plainville Police Chief, Robert Miller, spoke in support of the renewal of PPC’s license. He noted that he felt the relationship had grown beyond just business to blur the lines between community and family, noting that the casino treats its team members like family, and stated that it felt that PPC had woven themselves into the fabric of the community.

4. [Other Business](#) (58:38)

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

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

Voice Vote:

Ayes: 4.

Nays : 0.

The motion passed unanimously, 4-0. Meeting adjourned.

List of Documents and Other Items Used

1. [Notice of Public Hearing / Public Meeting and Agenda](#), dated April 14, 2025



Q1 2025 Report Massachusetts Gaming Commission

May 22, 2025

Revenue, Taxes, Lottery & Spend Update

MGM Springfield Q1 2025

Q1 2025 Gaming Revenue & Taxes

Month	Gaming Revenue	MA Taxes
January	\$22,750,069	\$5,687,517
February	\$20,925,382	\$5,231,345
March	\$25,548,562	\$6,387,141
Total	\$69,224,013	\$17,306,003

2025 YOY Gaming Revenue & Taxes

Year	Quarter	Table Games Revenue	Slots Gaming Revenue	Total Gaming Revenue	MA Taxes
2024	Q1	\$13,966,721	\$54,936,465	\$68,933,186	\$17,233,296
	Q2	\$12,978,593	\$54,139,847	\$67,118,440	\$16,779,610
	Q3	\$14,226,647	\$53,918,082	\$68,184,729	\$17,046,182
	Q4	\$12,788,884	\$55,123,010	\$67,911,894	\$16,977,973
	Total	\$54,030,844	\$218,117,404	\$272,148,248	\$68,037,062
2025	Q1	\$12,906,917	\$56,317,096	\$69,224,013	\$17,306,003
	Q2	-	-	-	-
	Q3	-	-	-	-
	Q4	-	-	-	-
	Total	\$12,906,917	\$56,317,096	\$69,224,013	\$17,306,003

Q1 2025 Sports Wagering Revenue



Month	Taxable Revenue	Taxes
January	(\$39,473)	\$0
February	\$112,272	\$16,841
March	(\$93,374)	\$0
Total	(\$20,575)	\$16,841

Month	Taxable Revenue	Taxes
January	\$5,456,706	\$1,091,341
February	\$4,704,617	\$940,923
March	\$4,081,055	\$816,211
Total	\$14,242,380	\$2,848,476

Q1 2025 Lottery

Month	Lottery Sales	% Change from Previous Year
January	\$114,646	3%
February	\$113,291	(11%)
March	\$171,102	(3%)
Total	\$399,038	(4%)

2025 YOY Lottery Sales

Year	Quarter	Lottery Sales	% Change from Previous Year
2024	Q1	\$414,543	-
	Q2	\$347,063	-
	Q3	\$410,768	-
	Q4	\$461,933	-
	Total	\$1,634,307	-
2025	Q1	\$399,038	(4%)
	Q2	-	-
	Q3	-	-
	Q4	-	-
	Total	\$399,038	(4%)

Q 1 2025 Diversity Spend

Diversity Category	Annual Goal	Q1%	Q1 Spend
MBE Vendor Spend	10%	5%	\$289,698
VBE Vendor Spend	2%	3%	\$185,863
WBE Vendor Spend	15%	12%	\$763,104
Total	27%	20%	\$1,238,664

2025 Local Spend

Diversity Category	Q1%	Q1 \$
Local* Vendor Spend	44%	\$2,739,621
MA Vendor Spend	55%	\$3,399,417

Note: Total Biddable Spend excludes gaming vendors, utilities, insurance, banking fees/services, and other expenses outlined within the American Gaming Association Diversity Spending Exclusion List (MGM Springfield Diversity and Affirmative Junketing Program - Appendix D).

*Local Vendor Spend includes Springfield, Surrounding Communities and Western Massachusetts.

Q1 Procurement Efforts

Q1 Procurement Events:

- 02/05/2025 – AIM & MGM x CEE – Insurance Bonding for Small Businesses
- 02/13/2025 –GNEMSDC Quarterly Industry Meeting
- 03/12/2025 – MGM Vendor Advisory Meeting & Showcase
- 03/25/2025 – Chef's Warehouse Culinary Expo



Compliance

MGM Springfield Q1 2025

Q1 2025 Compliance

Month	Minors intercepted in Gaming Area and prevented from Gaming	Compared to 2024	# Change	Minors intercepted gaming	Compared to 2024	# Change	Minors intercepted consuming alcohol	Compared to 2024	# Change
Jan	8	15	-7	3	2	1	0	0	0
Feb	6	10	-4	1	2	-1	0	1	-1
Mar	7	25	-18	1	4	-3	1	0	1

- Longest time in Gaming Area – 2 hours 16 minutes
- Shortest time in Gaming area – 39 seconds
- 2 underage were under 18 years old, the remaining 19 across the quarter, were between the ages of 18 – 20.

Employment

MGM Springfield Q1 2025

2025 Employment Numbers

2025	Goals	Q1 2025 %	Q1 2025 Total # of Employees	Q2 2025 %	Q2 2025 Total # of Employees	Q3 2025 %	Q3 2025 Total # of Employees	Q4 2025 %	Q4 2025 Total # of Employees
Minority	50%	52%	804	%		%		%	
Veteran	2%	4%	68	%		%		%	
Women	50%	41%	639	%		%		%	
Springfield Residents	35%	37%	575	%		%		%	
Western MA Residents	-	75%	1,165	%		%		%	
MA Residents	-	77%	1,190	%		%		%	
Total # Of Gaming Establishment Employees*	-		1,546						
Full Time	-		984						
Part Time	-		314						
On Call	-		248						

- MGM Springfield Sportsbook currently employs 11 team members.

Q1 2025 Workforce & Hiring Initiatives

Continued Property Tours and Presentations to Students of:

- Holyoke Community College (HCC)
- Manchester Community College
- Springfield College

Career Fairs at:

- UMass Hospitality
- Westfield State University

Workforce Development:

- Bay Path Women's Leadership Conference
 - 20 MGM Women Leaders Attended
 - MGMS showcased our Dealer Trainee Program to Attendees
- 54% of Promotions in Q1 were Women

Workforce Community Outreach:

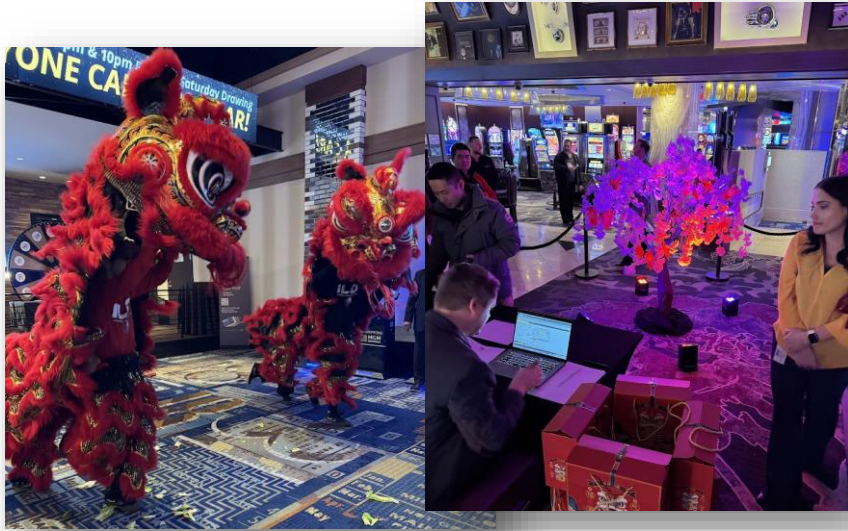
- Dress for Success (Women Focused Unemployed and Under-employed non-profit)
 - Support and Attendance at their Volunteer Appreciation Event
 - Continued participation in mentorship program
 - Celebratory Ribbon Cutting at their renovated boutique in Springfield



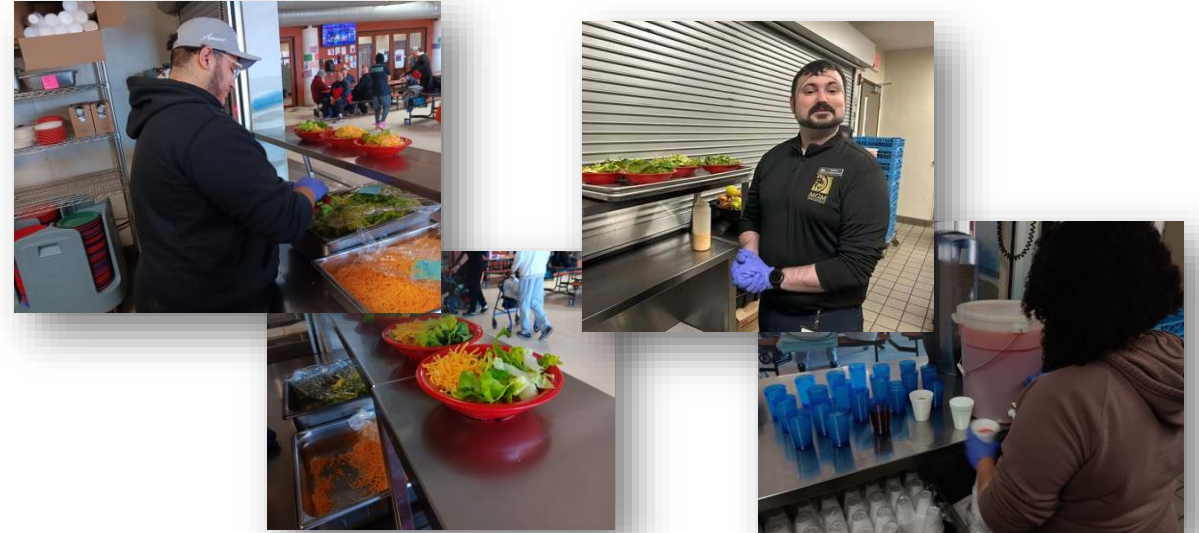
Community Outreach & Special Events

MGM Springfield Q1 2025

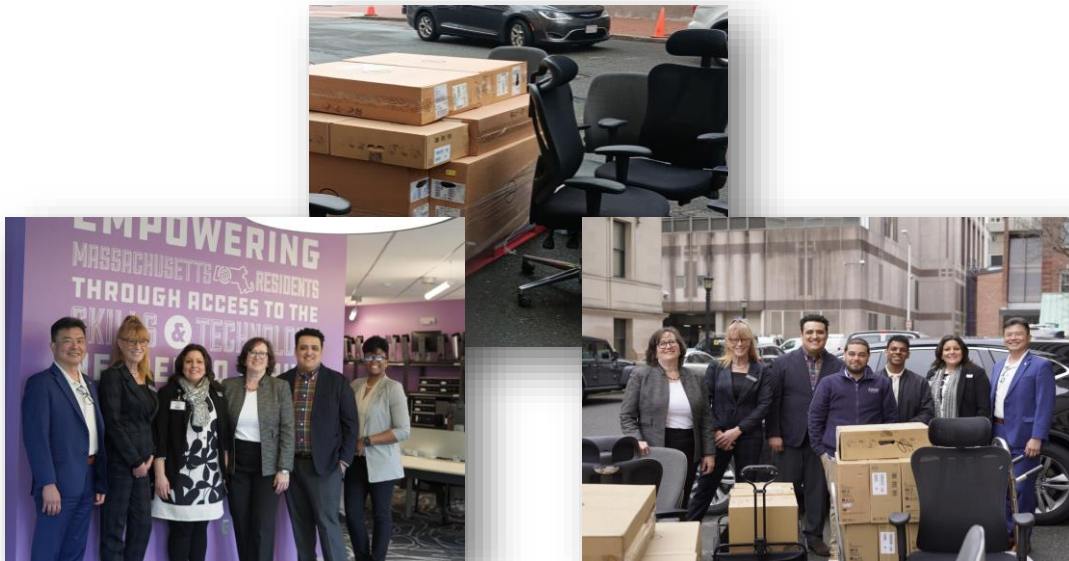
Q1 2025 Community Outreach & Special Events



Luna New Year Celebrations



Friends of the Homeless



Tech Foundry Donation



Springfield Public Schools Career Day at MGM Springfield

Q1 2025 Community Outreach & Special Events



Dr. Seuss Reading Day



Lorraine's Soup Kitchen



United Way Grocery Distribution



Baypath Women's Leadership Conference

Q1 2025 Community Outreach & Special Events



Problem Gambling Awareness Month - On-Site Screening Day Event

Q1 2025 Community Outreach & Special Events

- **Volunteer Support:** 551 Volunteer Hours
- **Nearly 200 more hours from Q1 2024**
- **Partnered with Hunger Relief Organizations:**
 - Served over 1,800 meals
 - Hundreds of grocery bags distributed
- **Donated Technical Equipment**
- **Community Music School Partnership**
- **Link to Libraries Volunteering in Springfield Public Schools**
- **Hosted Springfield Public Schools Career Fairs**
- **JUST GETTING STARTED!**



Entertainment

MGM Springfield Q1 2025

Q1 Entertainment at MassMutual Center



Upcoming Entertainment at MassMutual Center



Q1 Entertainment at MGM Springfield & Symphony Hall

**Halestorm's
Lzzy and Joe:
The Living Room Sessions**

FRIDAY, JAN 24
MGM Springfield
ARIA Ballroom

SOLD OUT



The Lalas

SATURDAY, FEB 15
MGM Springfield
ARIA Ballroom



**PATTI
LABELLE**
FEBRUARY 7



**FREE MUSIC
FRIDAYS**
7:30 to 9:00 p.m.

WINTER EDITION

JAN 31
AQUANETT
Tribute to 80's Rock N' Metal

FEB 7
**GOLD DUST
REFUGEE**
New England's Premier
Fleetwood Mac & Tom Petty
Tribute Band

FEB 14
**TRAILER
TRASH**
Today's Modern Country Music

FEB 21
**THE '69
SHOW**
The Best Music of
1969 and Woodstock

FEB 28
**CHANGES IN
LATITUDES**
America's Premier
Jimmy Buffett Tribute Show

Upcoming Entertainment at MGM Springfield



MAY 23	THE EAGLES EXPERIENCE <small>THE PREMIER EAGLES TRIBUTE SHOW</small>	JUL 18	BACK IN BLACK <small>THE TRUE AC/DC EXPERIENCE</small>
MAY 30	AMERICAN HONEY <small>A MODERN COUNTRY ROCKIN' POP PARTY</small>	JUL 25	PETTY LARGENY <small>NEW ENGLAND'S TOP TON PETTY TRIBUTE</small>
JUN 06	THE GREAT ESCAPE <small>A TRIBUTE TO JOURNEY</small>	AUG 01	BELOW DECK <small>TRASHY ROCK FAVORITES</small>
JUN 13	NEON 90s <small>NEW ENGLAND'S PREMIER TRIBUTE TO THE 1990'S</small>	AUG 08	BILLY & THE JETS <small>PLAYING THE HITS FROM ELTON JOHN & BILLY JOEL</small>
JUN 20	CATHEDRAL <small>ALL ERA VAN HALEN TRIBUTE</small>	AUG 15	JOHNNY SIXGUN <small>AUTHENTIC CLASSIC ROCK THE WAY YOU REMEMBER IT</small>
JUN 27	DOOKIE <small>AMERICA'S PREMIER GREEN DAY TRIBUTE</small>	AUG 22	TRAMPS LIKE US <small>THE #1 ROCK SPINWHEEL TRIBUTE BAND</small>
JUL 04	TRAILER TRASH* <small>TODAY'S MODERN COUNTRY MUSIC - 9PM START</small>	AUG 29	HIGH NOON <small>A TRIBUTE TO LONELY SATURDAY & SOUTHERN ROCK</small>
JUL 11	MALADO! <small>SPRINGFIELD'S TOP NAME IN R&B, FUNK & MORE!</small>	SEP 05	AQUANETT <small>TRIBUTE TO BOB'S ROCK N' ROLL</small>

FRIDAY NIGHTS OUTDOORS ON THE PLAZA STARTING AT 7:30PM.
WEATHER PERMITTING. SCHEDULE SUBJECT TO CHANGE WITHOUT NOTICE. VISIT MGMSpringfield.com FOR ADDITIONAL INFO.

PRESENTING SPONSORS:
MANSFIELD PAPER COMPANY, INC.
HAYMOND LAW FIRM
THE BIG E Sept. 12 - 28





Thank you



Quarterly Report Q1 2025

May 22, 2025
Massachusetts Gaming Commission

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Gaming Revenue, Taxes & Lottery Sales

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Gaming Revenue & Taxes: Q1 2025

Month	Table Games GGR	Slots GGR	Total GGR	State Taxes Collected
January	\$27,127,143.44	\$34,311,472.22	\$61,438,615.66	\$15,359,653.92
February	\$26,471,572.81	\$32,803,802.95	\$59,275,375.76	\$14,818,843.94
March	\$24,048,270.81	\$38,970,757.79	\$63,019,028.60	\$15,754,757.15
Total	\$77,646,987.06	\$106,086,032.96	\$183,733,020.02	\$45,933,255.01

Gaming Revenue & Taxes: Year-Over-Year

Year	Quarter	Table Games GGR	Slots GGR	Total GGR	State Taxes Collected
2024	Q1	\$91,803,193.22	\$103,968,890.63	\$195,772,084.05	\$48,943,021.01
	Q2	\$77,777,880.96	\$104,660,310.64	\$182,438,191.60	\$45,609,547.91
	Q3	\$79,846,301.53	\$104,247,558.45	\$184,093,859.98	\$46,023,465.00
	Q4	\$79,108,817.38	\$106,735,301.00	\$185,844,118.20	\$ 46,461,029.54
	Total	\$328,536,193.09	\$419,612,060.72	\$748,148,253.8	\$187,037,063.46
2025	Q1	\$77,646,987.06	\$106,086,032.96	\$183,733,020.02	\$45,933,255.01
	Q				
	Q3				
	Q4				
	Total (to date)	\$77,646,987.06	\$106,086,032.96	\$183,733,020.02	\$45,933,255.01

Sports Wagering Revenue & Taxes: Q1 2025

Month	Monthly Win	State Retail Taxes Collected
January	\$535,498.00	\$54,754.65
February	\$0	\$0
March	\$267,396.00	\$29,582.85
Total	\$802,894.00	\$84,337.50

Lottery Sales: Q1 2025*

Month	Lottery Sales	% Change from 2024
January	\$351,191.75	-31.2%
February	\$280,002.00	-30.7%
March	\$396,453.75	-40.9%
Total	\$1,027,647.50	-35.2%

*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
2024	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%
2025	Q1	\$1,027,647.50	-35.2%
	Q2		
	Q3		
	Q4		
	Total	\$1,027,647.50	-35.2%

Workforce

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Workforce Composition

Sector	Goal	Q1 % ¹	Q1 Total # of Employees
Minority	40%	74%	2,137
Veteran	3%	2%	67
Women	50%	45%	1,536
Local/Host/Surrounding Community Resident ³	75%	89%	3,048
MA Residents	-	92%	3,153
Total Number of Employees ⁴			3,419
Full-time			2,394
Part-time			1,025
On-call			0

¹ All Q1 figures are as of April 1, 2025. The total number of employees that did not specify a minority status during Q1 was 531.

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	2,137	1,536	67	3,419
% Actual	74%	45%	2%	
MANAGER AND ABOVE				
Number of Employees	79	82	11	205
% Actual	41%	40%	5%	
SUPERVISORS AND ABOVE				
Number of Employees	288	228	17	552
% Actual	57%	41%	3%	

Operating Spend



Operating Spend¹: Diversity

Diversity Category	Annual Goal	Q1 %	Q1 Spend
MBE Vendor Spend	8%	11%	\$2,200,395.09
VBE Vendor Spend	3%	0%	\$49,791.50
WBE Vendor Spend	14%	18%	\$3,642,371.19
Total Diverse Spend	25%	29%	\$5,892,557.78

¹ All spend figures referenced herein are based upon Encore Boston Harbor's Q1 discretionary spend amount of \$20,218,968.82.

Operating Spend: Local

Local Vendor Spend	Goal	Q1 %	Q1 \$
Boston	\$20,000,000.00	16%	\$3,181,764.66
Chelsea	\$2,500,000.00	2%	\$417,744.32
Everett	\$10,000,000.00	10%	\$2,037,222.02
Malden	\$10,000,000.00	1%	\$128,455.14
Medford	\$10,000,000.00	2%	\$440,125.01
Somerville	\$10,000,000.00	5%	\$944,592.02
MA Vendor Spend	N/A	57%	\$11,451,079.68

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	Number of Minors on Gaming Floor Under 18 Years of Age
January	4	1	0	1	1	0	2	0
February	2	1	1	0	0	0	1	0
March	2	0	0	0	1	1	1	0
Total	8	2	1	1	2	1	4	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 59 minutes.
- The longest length of time spent by a minor on the casino floor was 3 hours, 48 minutes.
- The shortest length of time spent by a minor on the casino floor was 31 seconds.

Human Resources Initiatives

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Launch of the Climb Program

- Highly selective, 6-month professional development opportunity for 10 high-potential managers
- In partnership with BU's School of Hospitality Administration and UNLV faculty
- Candidates were nominated by department leaders and nominations were supported by divisional VPs or Executives
- Upon completion, graduates receive a Certificate of Completion of the Executive Education Program from BU in partnership with Wynn University
- Intended to be an annual program for high potential leaders



All-Star of the Year Announcement

On Wednesday, February 5th, the winners of the All-Star of the Year were surprised and celebrated. Their nominators, leaders and our executives gathered in one of our residences to announce the winners.



Stars Reception

On Wednesday, March 19 we celebrated the 2024 Stars and All-Stars with a reception held in Rare. All recipients, along with their nominating supervisor or as well as the executives, were invited.

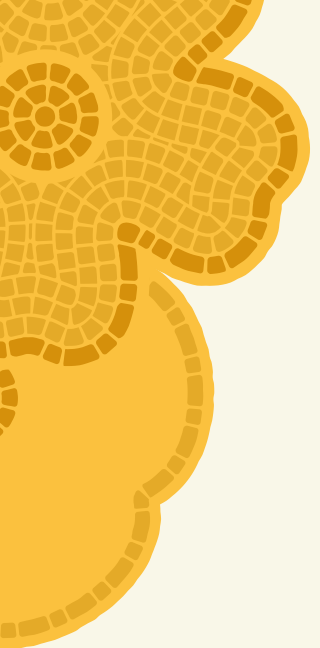
Each Star also received an EBH bathrobe custom embroidered with the Stars or All-Stars logo and their name.



Forbes Five-Star Celebration

During Q1 we celebrated that our hotel and spa were once again recognized with the Forbes Travel Guide (FTG) Five-Star distinction, an accolade we have now achieved every year we have been assessed. Rare Steakhouse received a FTG Four-Star Rating for exceptional dining, maintaining its distinction as the highest-rated steakhouse in the Boston area.





During Problem Gaming Awareness Month in March, GameSense held several informational sessions in our heart-of-house areas. Employees who participated entered a raffle to receive a prize. We also coordinated with GameSense on their guest-facing initiatives.



Employee Appreciation Day

On Friday, March 7, we celebrated Employee Appreciation Day by having our executives assist us in handing out chocolate chips cookies made by our amazing Pastry Team.

One of our new partners, Volo Sports also attended to offer information on the programs they have available for our employees.



Promotions, Marketing, Special Events & Volunteerism

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Community Relations Highlights



Q1 Volunteer Hours

- Employees volunteered 945 hours of their personal time serving organizations such as The American Red Cross Food Pantry, Pine Street Inn, Tailored for New England Center, and Home for Veterans.

Volunteer Appreciation Breakfast

- We hosted more than 100 of our top volunteers with a volunteer appreciation breakfast and honored our top 10 volunteers for their efforts in volunteerism during 2024.

Blood Drive with the American Red Cross

- We partnered with Big Night for our first Red Cross Blood Drive of the year, helping collect a total of 22 units. We were proud to have eight Encore employees become first time donors.

Valentine's Dat Bake Sale

- Our pastry team hosted the year's first bake sale and created four unique cupcake flavors. We helped raise over \$3,200 including matched donations with all proceeds helping to raise funds for the Wynn Resorts Community Grant Fund.

TRU Contributions: Q1 2025

Charitable Organization	Dollar Amount	Number of Tickets
Animal Rescue League of Boston	\$20,851.41	89,581
Big Sister Association of Greater Boston, Inc.	\$9,553.87	62,059
New England Center and Home for Veterans	\$15,853.67	76,822
South Cove Manor at Quincy Point Rehab Center	\$8,799.42	59,544
Total	\$55,058.37	288,006



Questions?



PLAINRIDGE PARK

Q1 2025 REPORT



RETAIL SPORTS WAGERING REVENUE AND TAXES

Year	Quarter	Net Sports Wagering Revenue	Sports Wagering Taxes
2024	Q1	\$1,026,537	\$153,981
	Q2	\$84,399	\$40,705
	Q3	\$938,110	\$140,717
	Q4	\$198,812	\$60,055
	Total	\$2,247,858	\$395,458
2025	Q1	\$575,358	\$86,304
	Q2		
	Q3		
	Q4		
	Total	\$575,358	\$86,304

In addition to the Retail Sportsbook, Plainridge Park has 20 sports wagering kiosks.



GAMING REVENUE AND TAXES

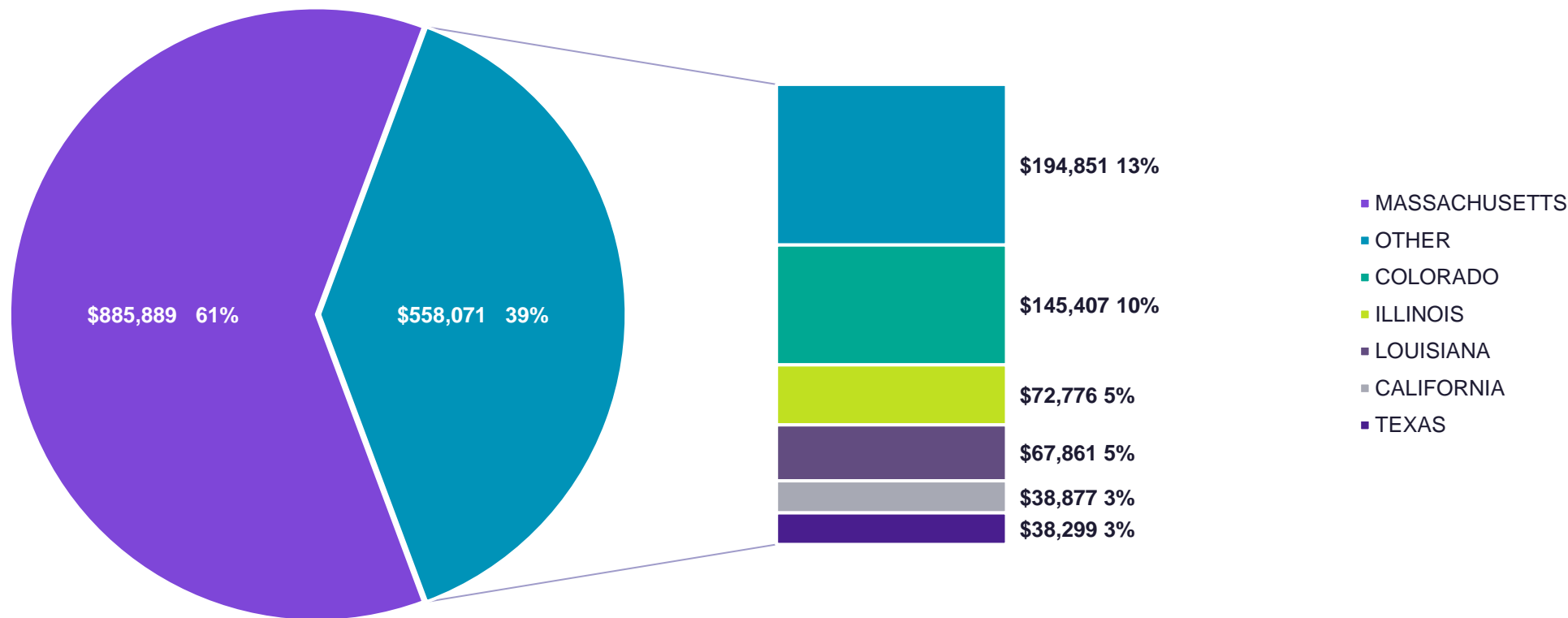
Year	Quarter	Net Slot Revenue	State Taxes	Race Horse Taxes	Total Taxes
2024	Q1	\$40,478,391	\$16,191,357	\$3,643,055	\$19,834,412
	Q2	\$42,015,386	\$16,806,154	\$3,781,385	\$20,587,539
	Q3	\$42,539,918	\$17,015,967	\$3,828,593	\$20,844,560
	Q4	\$43,493,668	\$17,397,467	\$3,914,430	\$21,311,898
	Total	\$168,527,363	\$67,410,945	\$15,167,463	\$82,578,409
2025	Q1	\$43,494,439	\$17,397,776	\$3,914,500	\$21,312,275
	Q2				
	Q3				
	Q4				
	Total	\$43,494,439	\$17,397,776	\$3,914,500	\$21,312,275

LOTTERY SALES

Quarter	2025	2024	\$ Difference	% Difference
Q1	\$644,925	\$618,943	\$25,982	4.20%
Q2				
Q3				
Q4				
Total	\$644,925	\$618,943	\$25,982	4.20%

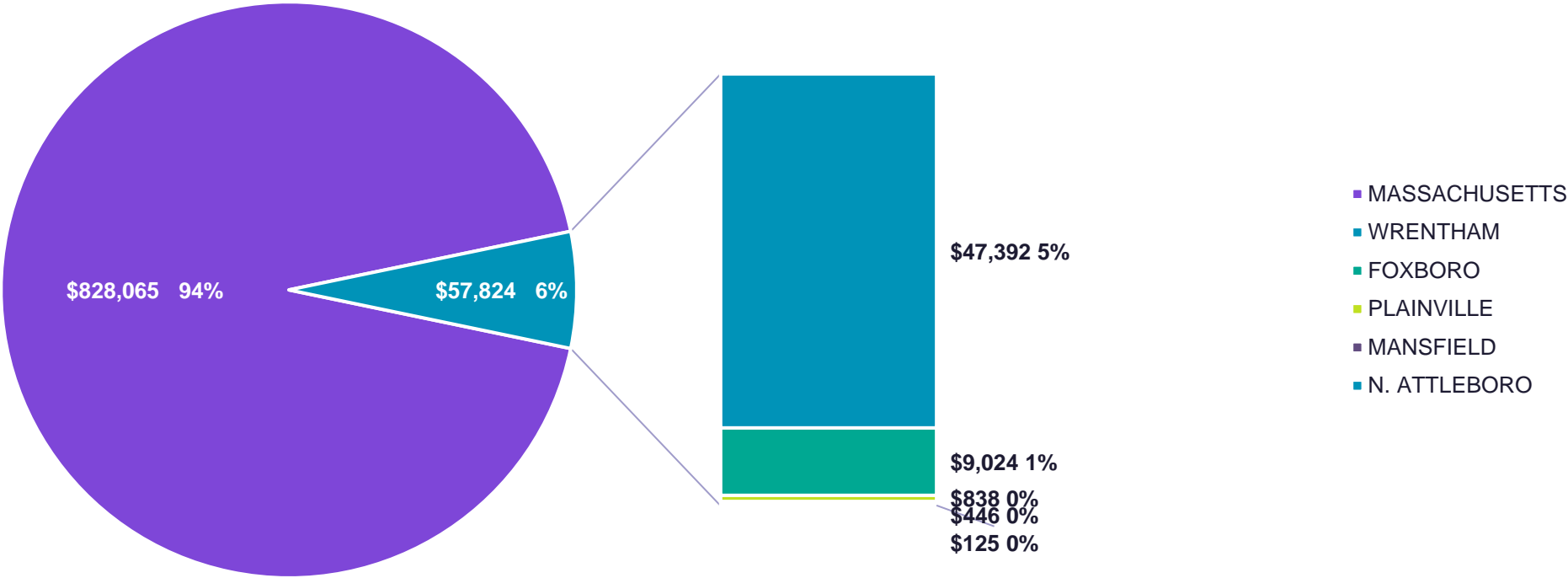
SPEND BY STATE

Q1 2025 Total Qualified Spend By State



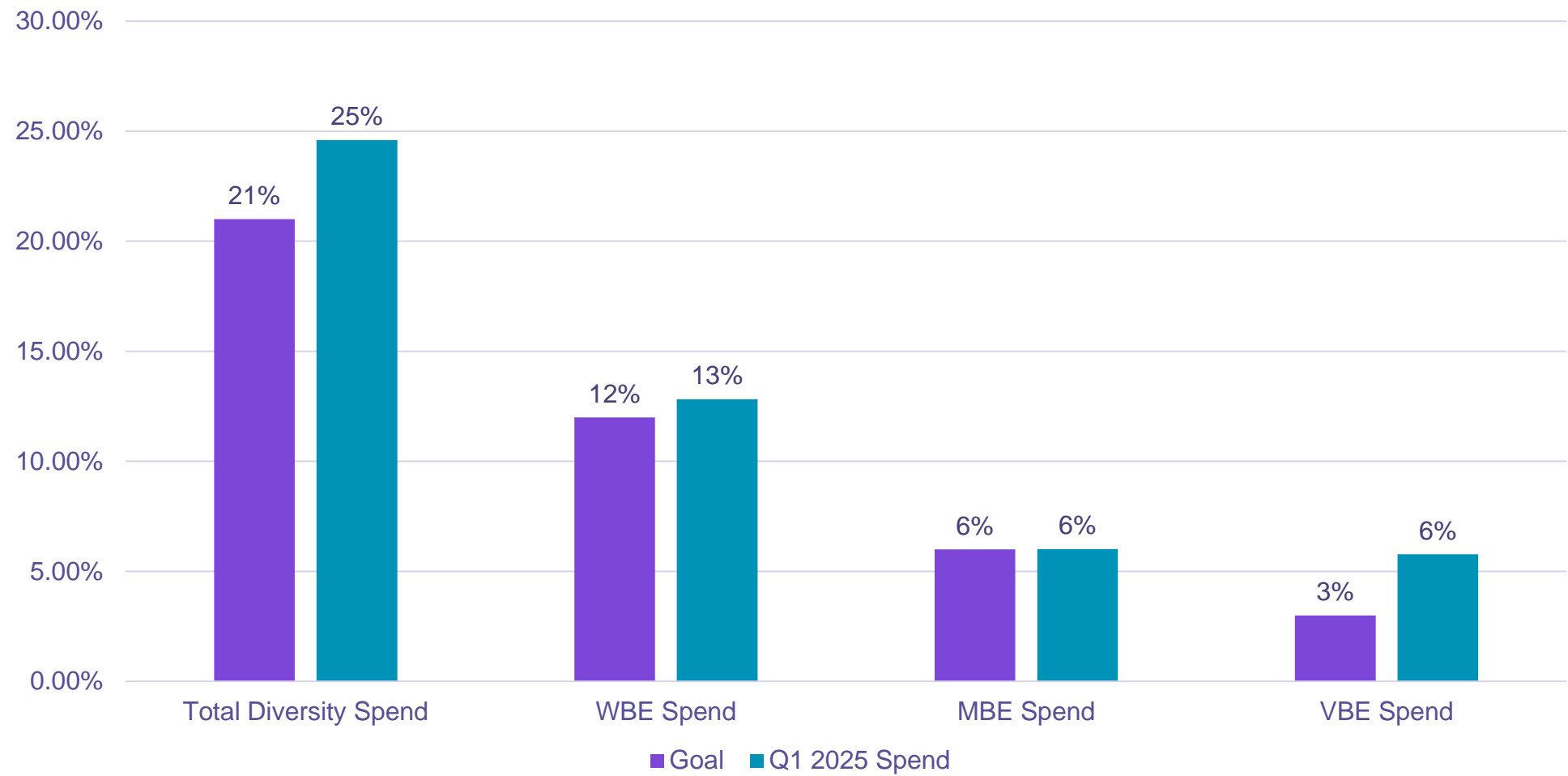
LOCAL SPEND

Q1 2025 Massachusetts vs Host & Surrounding Community Qualified Spend



VENDOR DIVERSITY

Q1 2025 vs Goal



DIVERSE SPEND

Category ¹	Q1 2025	Q4 2024	\$ Difference	% Difference
WBE	\$185,093	\$187,504	(\$2,411)	(1.29%)
MBE	\$86,721	\$151,109	(\$64,389)	(42.61%)
VBE	\$83,407	\$84,047	(\$639)	(0.76%)
Total Diverse Spend	\$355,221	\$422,661	(\$67,439)	(15.96%)
Qualified Spend	\$1,443,960	\$1,748,823	(\$304,862)	(17.43%)

¹ Includes vendors that are certified in multiple diversity categories. Spend is reported in all qualified categories.

COMPLIANCE

Month	Prevented from Entering Gaming Establishment			Expired, Invalid, No ID	Fake ID	Weapon Detected	Minors and Underage Escorted from the Gaming Area	Minors and Underage found Gaming at Slot Machines	Minors and Underage Escorted from the Sports Wagering	Minors and Underage found Sports Wagering	Minors and Underage Consuming Alcoholic Beverages
	Total	Minors ¹	Underage ²								
January	68	8	18	41	1	n/a	0	0	0	0	0
February	42	5	12	25	0	n/a	0	0	0	0	0
March	61	7	16	30	0	8	1	0	0	0	0
Total	171	20	46	96	1	8	1	0	0	0	0

¹ Person under 18 years of age

² Person 18-21 years of age



EMPLOYMENT¹: ALL EMPLOYEES²

Employee Category	Percentage Goal	Total # of Employees in Category	Q1-25 Actual Percentage of Total Employees	Q4-24 Actual Percentage of Total Employees
Diversity	15%	134	31%	32%
Veterans	2%	219	4%	5%
Women	50%	190	43%	44%
Local ³	35%	144	33%	32%
MA Employees		261	57%	59%

¹ All employees referenced in this slide were current as of Q1 2025

² Total number of employees Q1 2025: 439

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

	Employees	Full-Time	Part-Time	Seasonal
Total	4439	287	152	0
% of Total	100%	65%	35%	0%

EMPLOYMENT¹: SPORTSBOOK²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	2	13%
Veterans	0	0%
Women	5	31%
Local ³	3	19%
Full-Time	9	56%

¹ All employees referenced in this slide were current as of Q1 2025

² Total number of **Sportsbook employees (does not include Sports restaurant employees)** Q1 2025: 16

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

EMPLOYMENT¹: SUPERVISOR AND ABOVE²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	17	21%
Veterans	3	4%
Women	24	29%

¹ All employees referenced in this slide were current as of Q1 2025

² Total number of Supervisor and Above Q1 2025: 82



PPC CARES

OUR DEVELOPMENT - Q1, 2025



CREATING OUTSTANDING LEADERS

To invest in the professional and personal development of TEAM MEMBERS by providing exposure to diverse perspectives and experiences, fostering growth and purpose-driven leadership, and promoting self-esteem and confidence in our team members.

MA Con



PENN: LEADERSHIP TEAM MEETING



ACES OF PENN: TEAM MEMBERS OF THE QUARTER



Tri-Town Chamber of Commerce: Leadership



Tri-Town Chamber of Commerce: Leadership



PENN: DEI&B



ACES OF PENN: TEAM MEMBERS OF THE QUARTER



PPC CARES

OUR TEAM - Q1, 2025



AHA: HEART HEALTH AWARENESS MONTH CPR



VALENTINE'S DAY: SWEET DRIVE



ENGAGED TEAM MEMBERS

To provide training, work environments, events, activities for TEAM MEMBERS to stay motivated, creative, and work well together to achieve shared goals. Our leaders should inspire team members that are eager to learn and grow, and feel valued for their feedback.



ACS: VOICES AT BOSTON COLLEGE



WOMENS: INTERNATIONAL WOMEN'S DAY



WOMENS: INTERNATIONAL WOMEN'S DAY



RECRUITMENT: JWU



PPC CARES

OUR COMMUNITY - Q1 2025



PARTNERING SUCCESS

Working collaboratively with our community partners and TEAM MEMBERS to help mobilize resources and influence systems. Our team members will dedicate resources such as time, funding, and people with the necessary skills to enhance the mission of our community partners.



HABITAT FOR HUMANITY



HABITAT FOR HUMANITY



HABITAT FOR HUMANITY



BOSTON MARATHON FUNDRAISER



BOSTON MARATHON FUNDRAISER



IWD: AMERICAN CANCER SOCIETY



IWD: MASS GAMMING COMMISSION



IWD: PLANNING COMMITTEE



IWD: PLANNING COMMITTEE



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

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

CC: Dean Serpa, Executive Director

DATE: May 22, 2025

RE: Springfield Youth Health Surveys: Understanding Gambling Behavior in Springfield

The Public Health Institute of Western Massachusetts has led efforts to conduct the Springfield Youth Health Survey (SYHS) and Springfield Youth Risk Behavior Survey (SYRBS) with 8th, 10th, and 12th graders enrolled in Springfield Public Schools.

The Springfield Youth Health Survey (YHS) is administered to 8th grade students enrolled at Springfield Public Schools. It is a modified version of the survey used by the [Massachusetts Department of Public Health](#). The survey contains questions about diet, exercise, screen time, mental health, bullying, violence, health, alcohol, tobacco, marijuana and other drugs, and more.

The Springfield Youth Risk Behavior Survey (YRBS) is administered to 10th and 12th grade students enrolled at Springfield Public Schools. The instrument used in Springfield is a modified version of the survey created by the Centers for Disease Control and Prevention and used statewide by the [Massachusetts Department of Public Health and Department of Elementary and Secondary Education](#). The survey content is similar to the YHS, and it contains questions about safety, violence-related behaviors, bullying, self-harm, alcohol, tobacco, marijuana and other drugs, communication and education about sexuality and sexual health services, and more.

The Massachusetts Gaming Commission initially funded survey efforts in 2019 after the opening of MGM Springfield in 2018 to add enhanced gambling questions to understand more about youth gambling behavior and its relationship to other health issues. This presentation focuses on results and trends from this survey.

Attached is the presentation.



Massachusetts Gaming Commission



Springfield Youth Health Surveys

Understanding Youth Gambling Behavior in Springfield

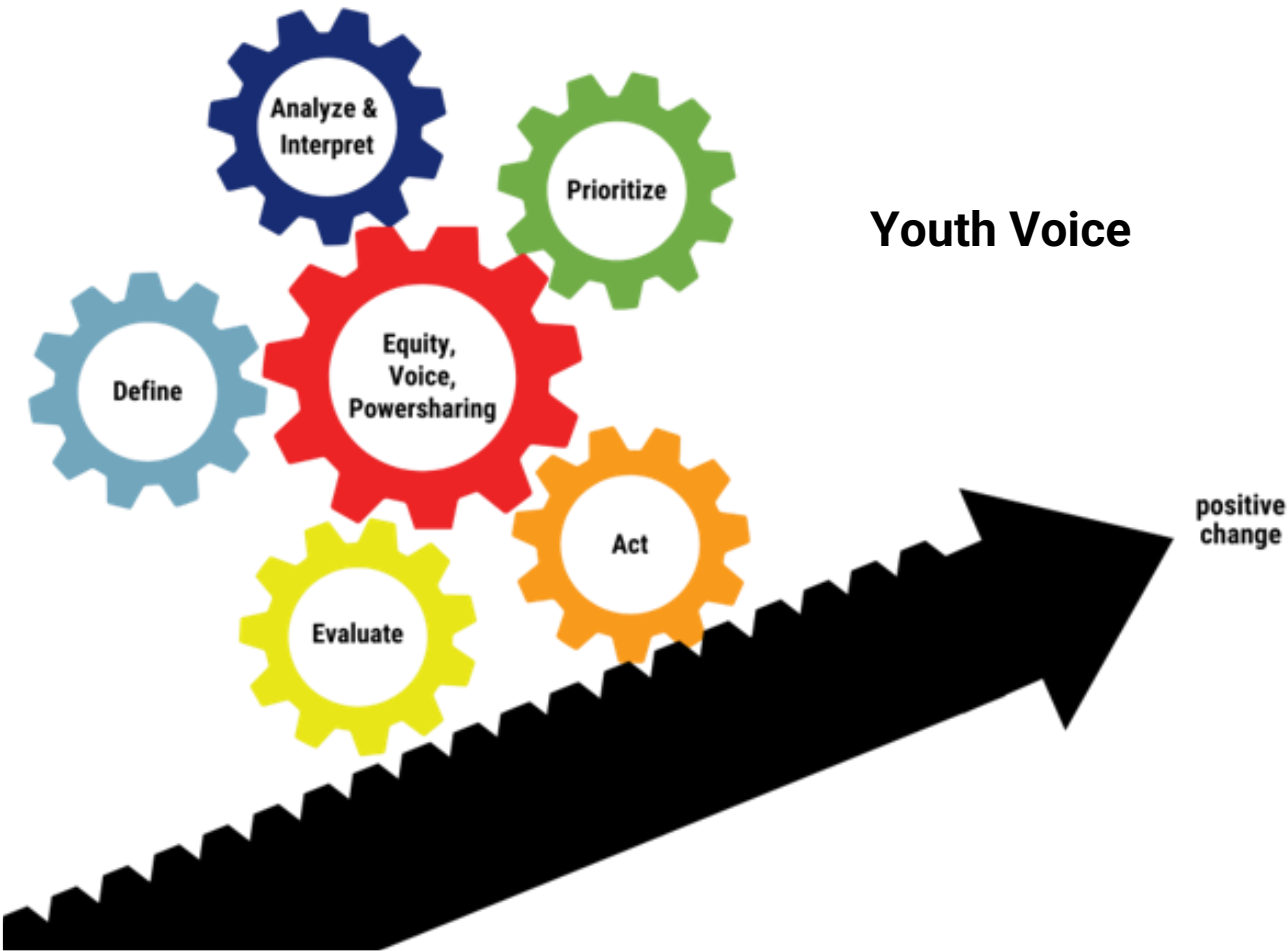
Kathleen Szegda, PhD, MPH, MS
Senior Director of Community Research and Evaluation



PUBLIC HEALTH INSTITUTE
OF WESTERN MASSACHUSETTS
PARTNERS FOR HEALTH EQUITY

About the Springfield Youth Health Survey Initiative

- **Goal:** use data for action to support youth health in Springfield
- **Partnership** effort started in 2014



Youth Health Survey (YHS)

8th grade students
Modified version of survey used by MDPH and MDESE

Youth Risk Behavior Survey (YRBS)

10th and 12th grade students
Modified version of survey used by MDPH and MDESE, developed by CDC

Different funders have supported the initiative over time:

2024 Planning Team Partners:



Shriners Hospitals for Children®—Springfield, MA

Understanding Youth Gambling Behavior

- MGC initially funded in 2019 after the opening of MGM in 2018
- Community concerns about the impact of a casino (WMCHIA)
- Interest in understanding the impact of a casino on youth gambling behavior
- Starting gambling at a young age is a risk factor for problematic gambling later in life
- Added gambling questions to understand the prevalence of gambling

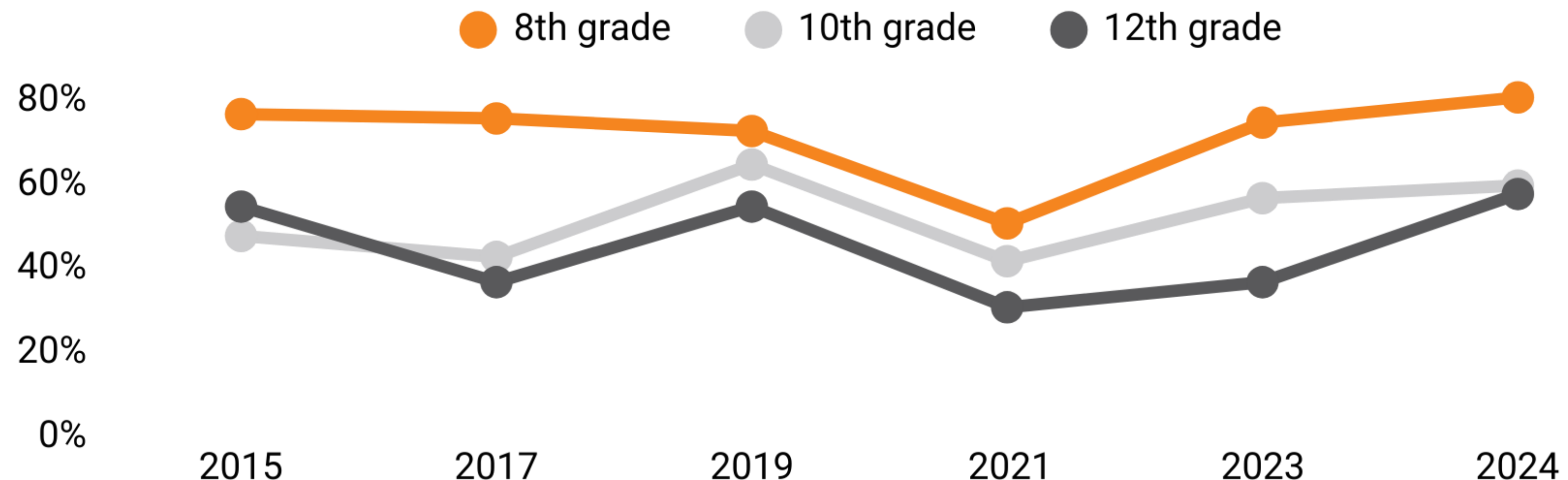


Western MA Casino HIA, Public Health Institute of Western MA, (formerly Partners for a Healthier Community), 2014

Youth Survey Methods

Participation Rates Over Time

(% of students in each grade that completed the survey out of all enrolled SPS students in each grade)



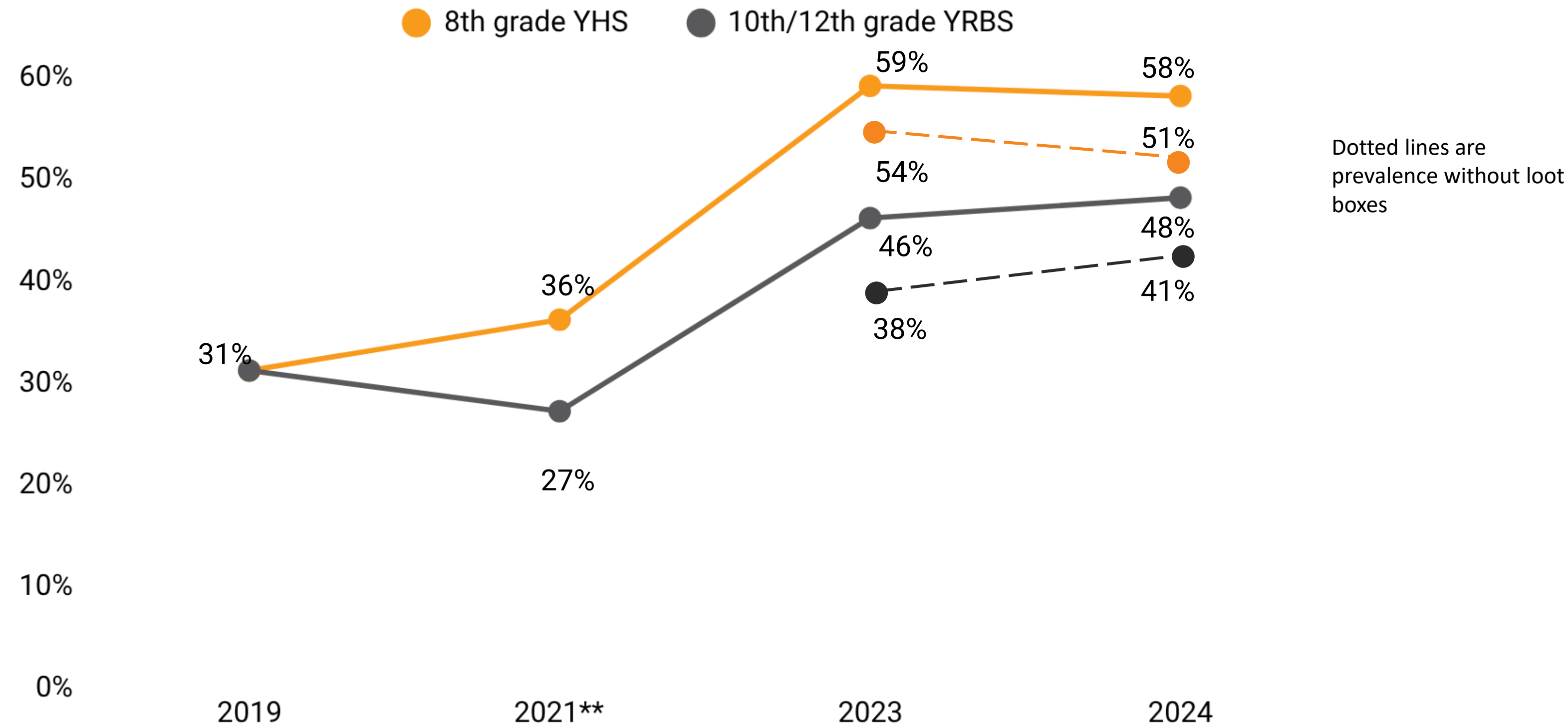
Types of Gambling on Springfield YHS/YRBS, 2024

- **Lottery tickets**
- **Sports betting** (updated for 2024)
 - not including fantasy sports, not online, with friends or family*
 - Sports betting, not including fantasy sports, online*
 - Playing fantasy sports without using money*
 - Betting on fantasy sports*
- Playing **card games** for money with friends or family*
- **Games of skill** (i.e. pool, video games)*
- Opening/buying a **loot box in a video game**
- Gambling **online without using money**
- Gambling **online with money**
- Betting money on **horse races***
- Playing **bingo** for money
- Playing **slot machines/table games at a casino**
(casino gambling grouped together for 2024)*

* Question language has changed from year to year. Use caution when drawing comparisons over time. Please refer to the Youth Health Survey Initiative page on our website to learn more (linked at the end of this presentation).

* response options were collapsed in 2024

Gambling Prevalence* Over Time

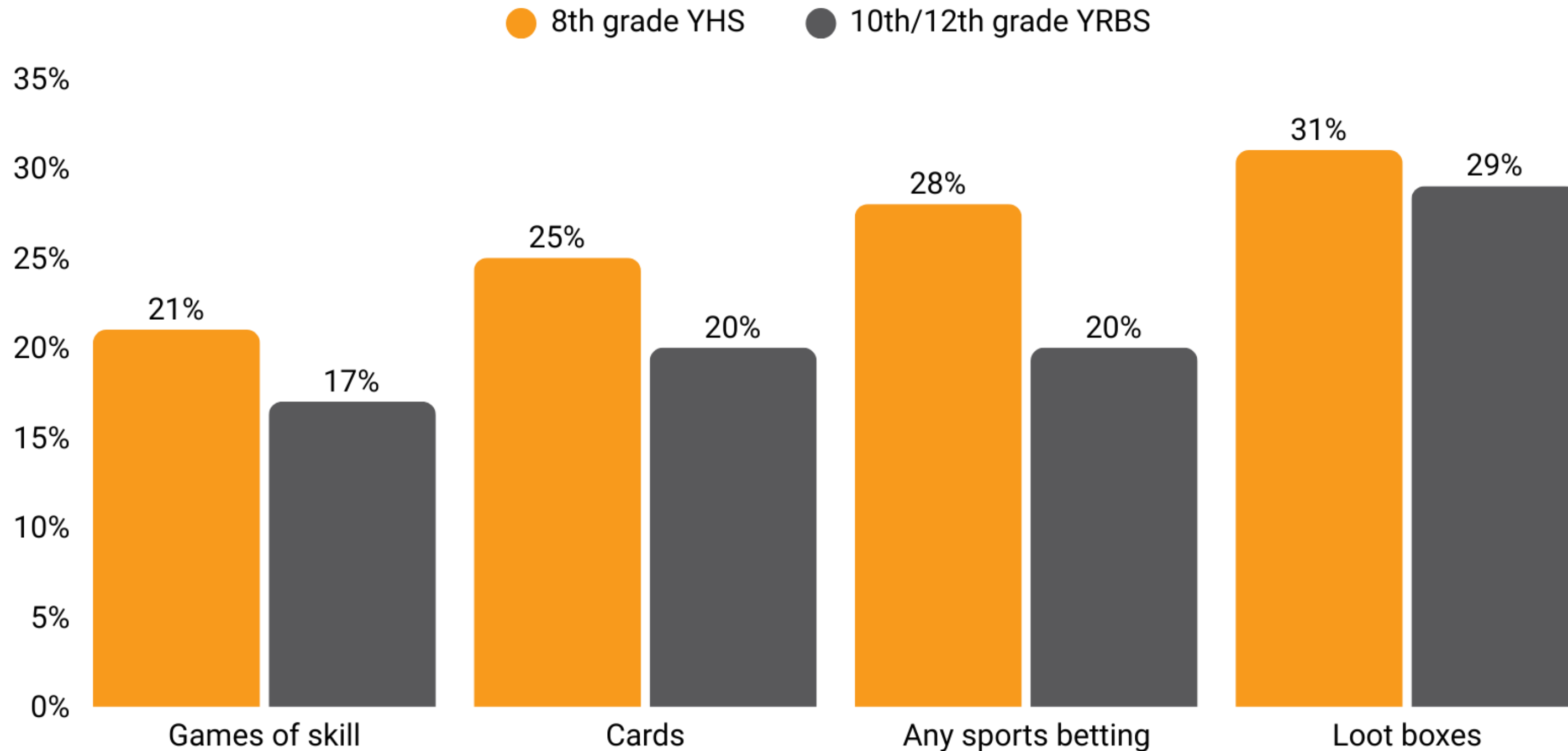


* Not all gambling behaviors have been asked about each year. For example, more detailed sports betting questions were added in 2024, and loot boxes were asked about starting in 2023. Casino table games and slot machines were combined into one question in 2024.

** COVID-19 year; low response rates; interpret with caution

Most Common Types of Gambling, 2024

YHS & YRBS



Omitted "Don't know" responses

Note: Previous to 2024, sports betting was captured in one question; this is the first time sports betting has been broken out with specificity

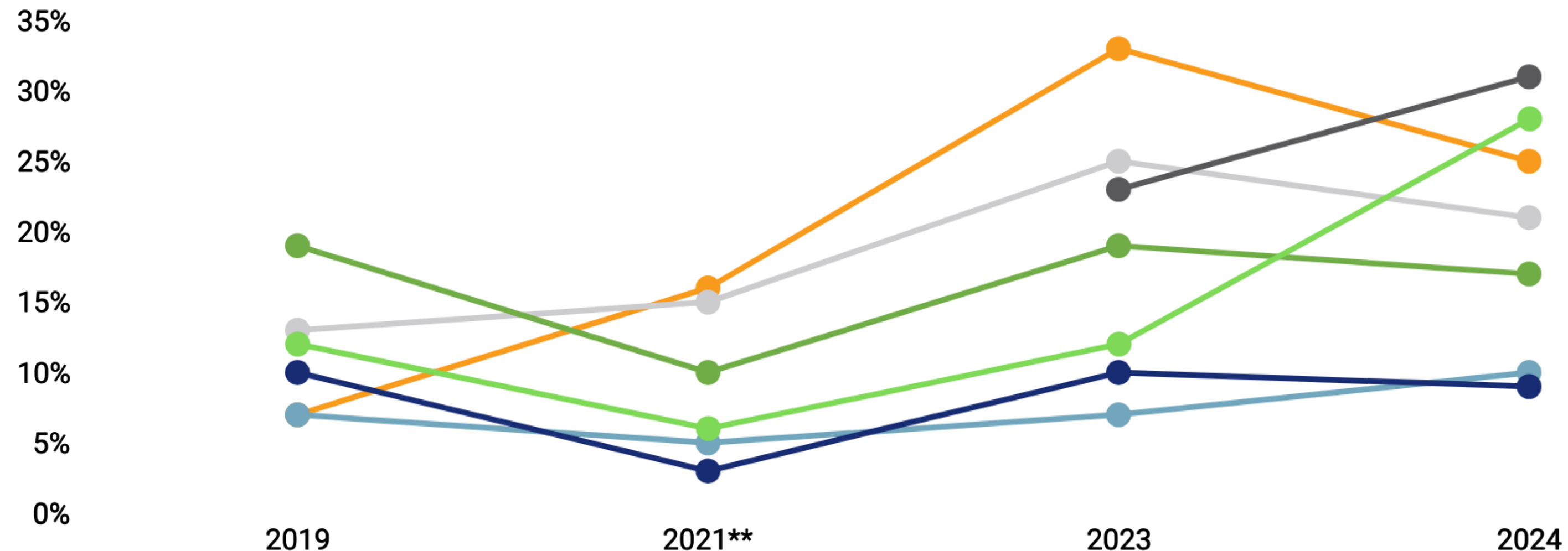


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Commonly Reported Types of Gambling* Over Time, 8th Grade

The percent of students who reported engaging in the following gambling behaviors in the past year:

● Playing card games for money ● Games of skill ● Opening loot boxes ● Lottery tickets ● Bingo
● Sports gambling ● Gambling with money online

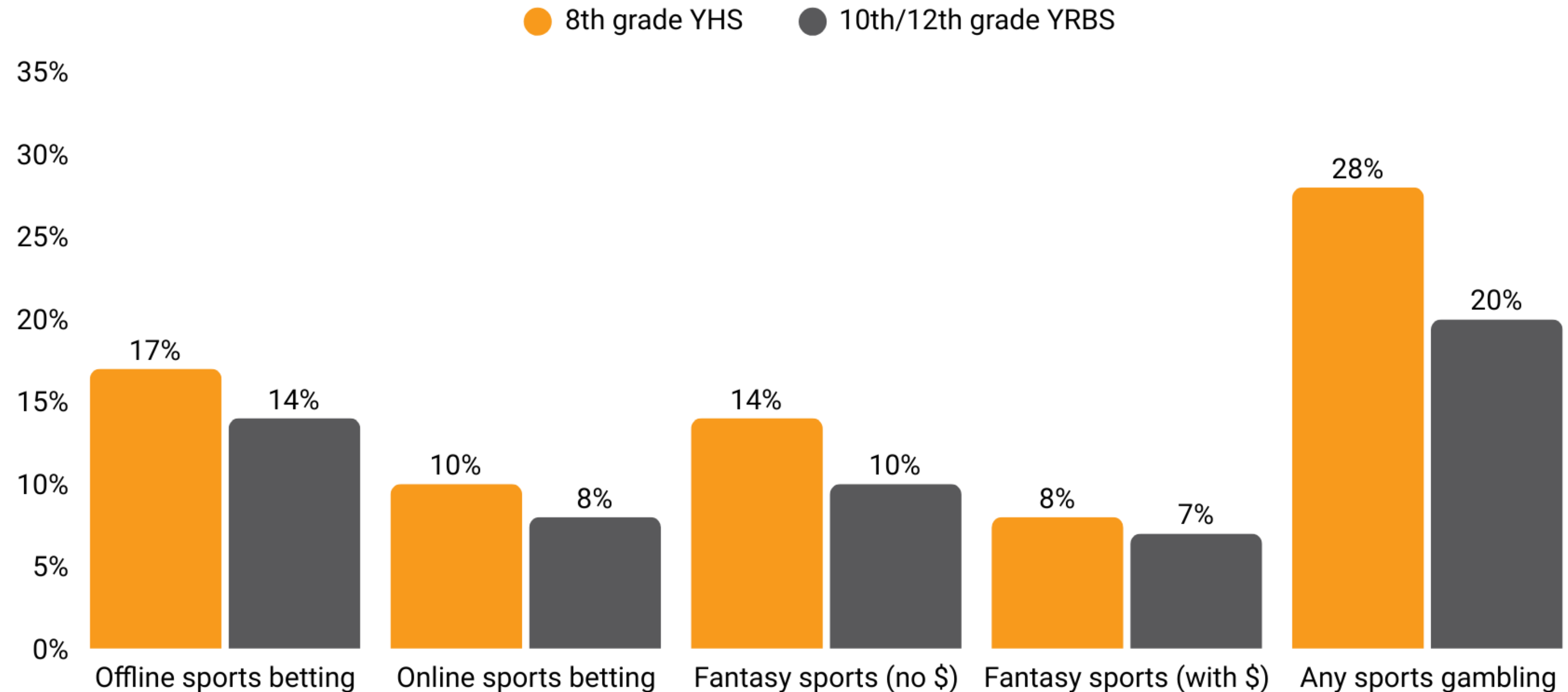


* Not all gambling behaviors have been asked about each year. In 2024, questions about sports betting were separated out for the first time (differentiating offline sports betting, online sports betting, and fantasy sports). In 2023, loot boxes were asked about for the first time.

** COVID-19 year; low response rates; interpret with caution

Sports Gambling, 2024

The percent of students who reported engaging in the following gambling behaviors in the past year:



Omitted "Don't know" responses

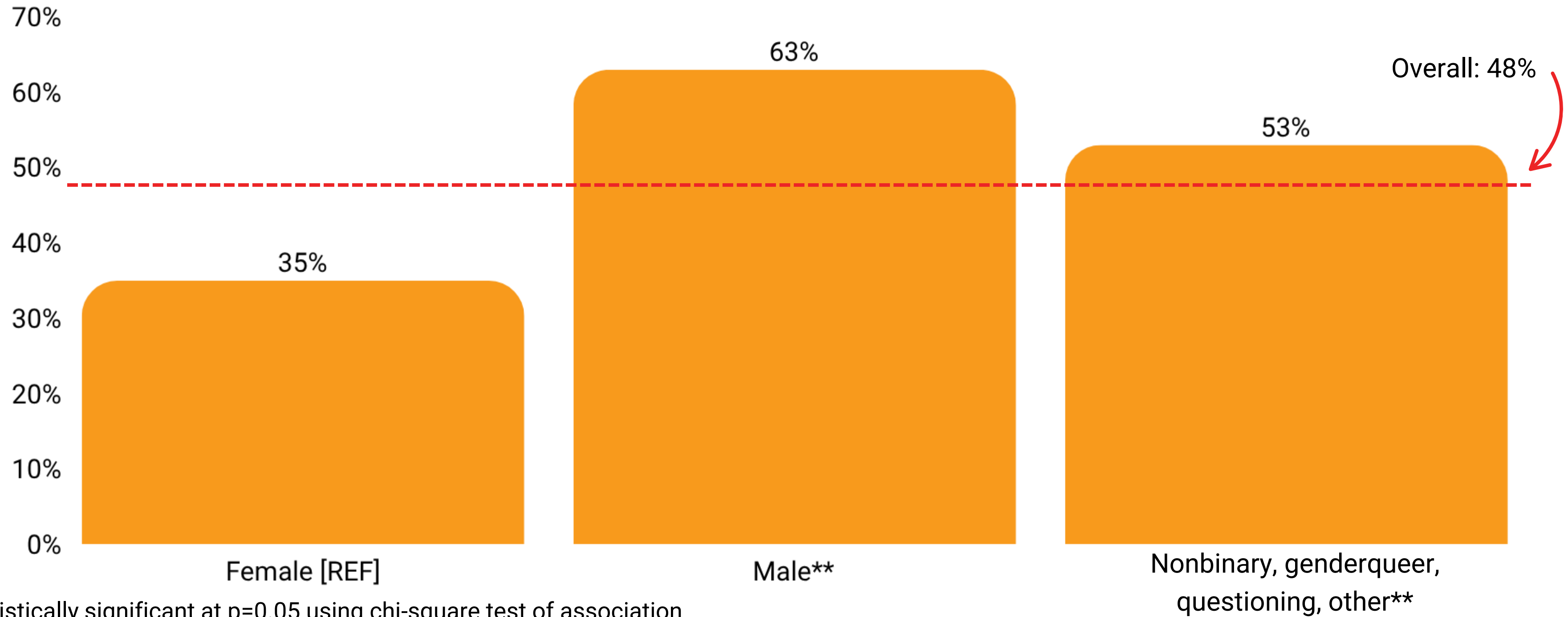
Note: Previous to 2024, sports betting was captured in one question; this is the first time sports betting has been broken out with specificity

Gambling Prevalence* by Identity, 2024

Springfield YHS 8th Grade

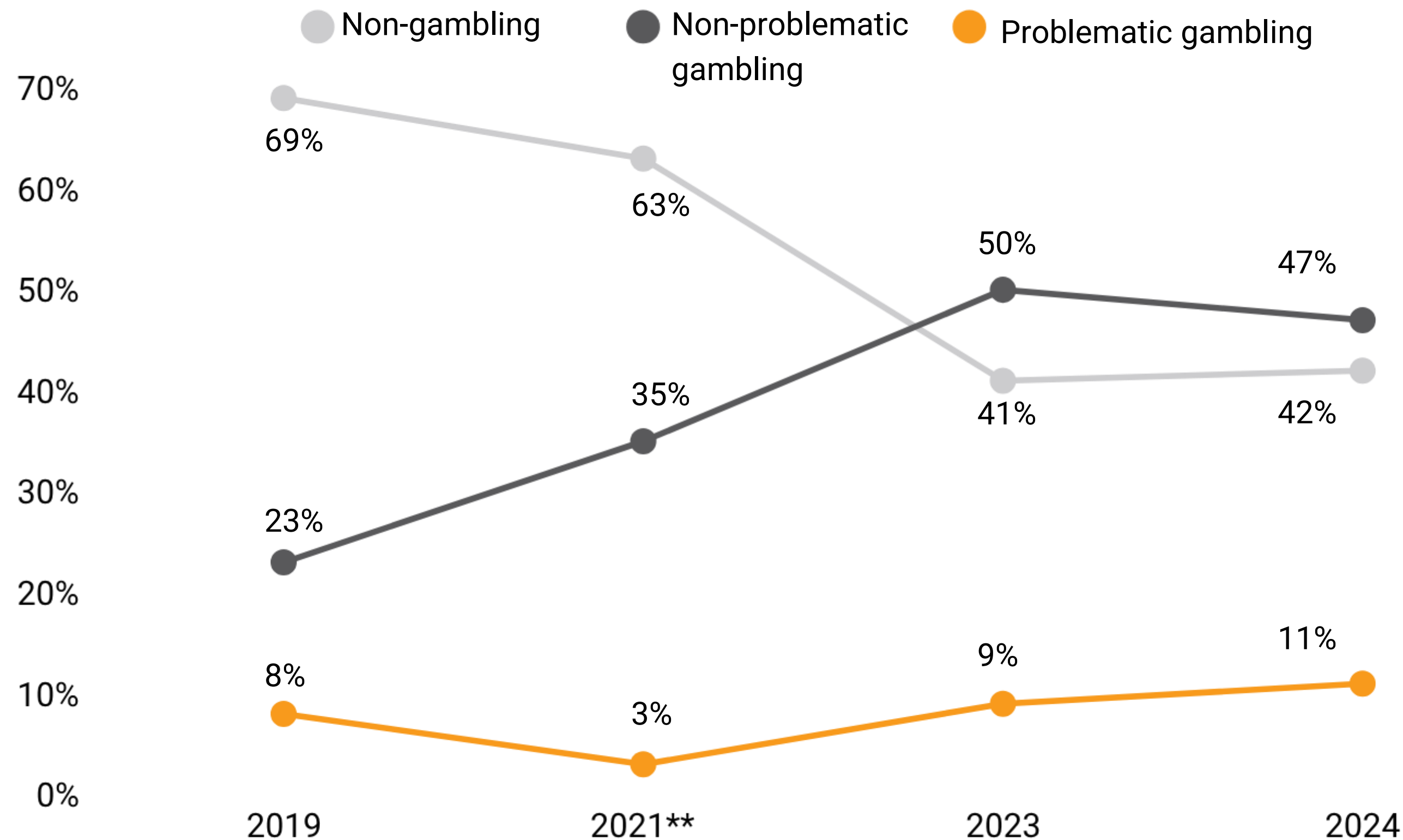


Gambling Prevalence* by Identity, 2024 Springfield YRBS 10th/12th Grades



** Statistically significant at $p=0.05$ using chi-square test of association

Problematic Gambling* Over Time, 8th Grade



* "Problematic gambling" is the phrase used by the NLCLiP.

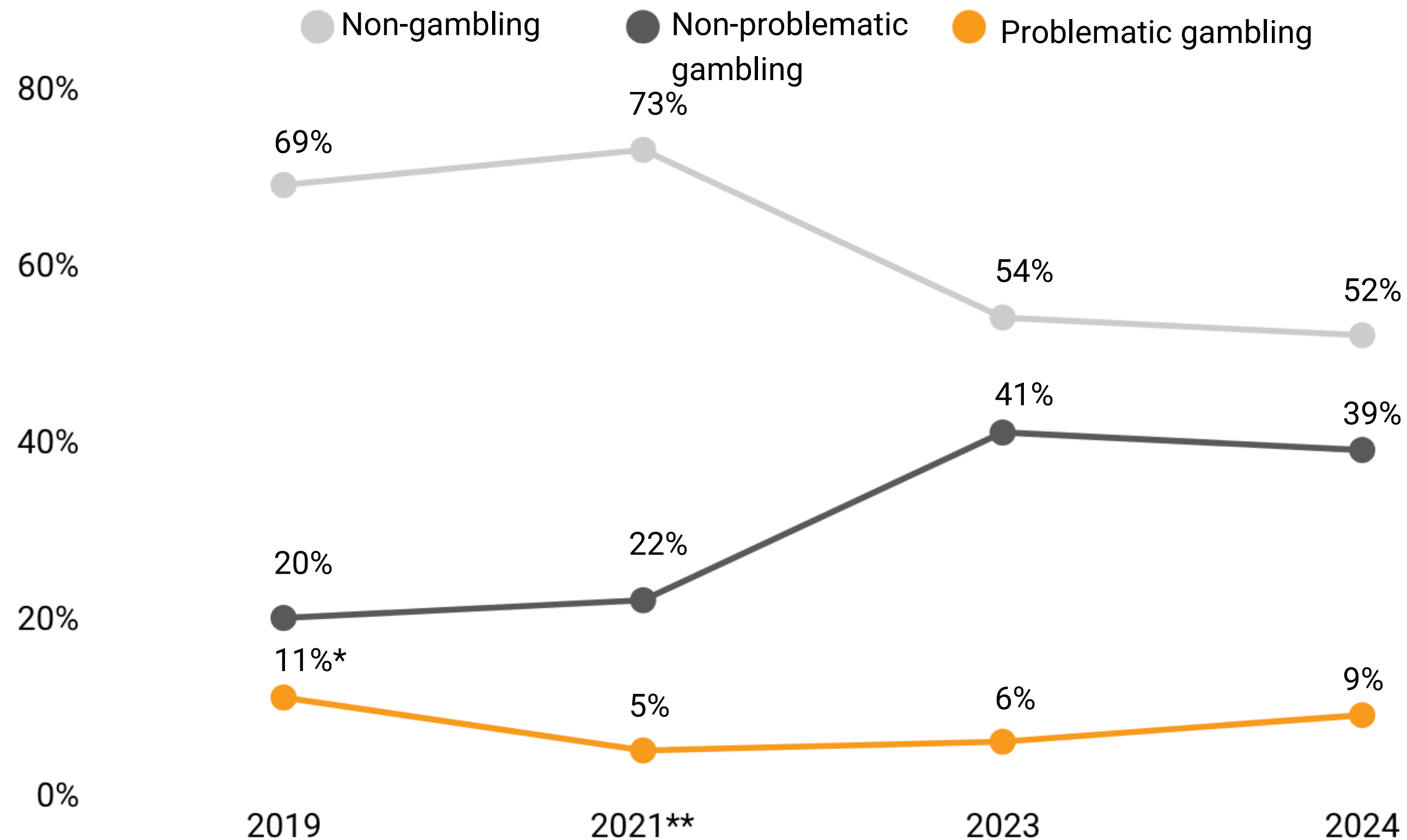
Lepper J, Haden B. Testing NLCLiP: Validation of Estimates of Rates of Non-problematic and Problematic Gambling in a Sample of British Schoolchildren. *J Gambi Stud*. 2013;29(1):15-27.

doi:[10.1007/s10899-012-9294-0](https://doi.org/10.1007/s10899-012-9294-0)

The gambling questions on the YHS have changed over the years, including with the addition of loot boxes in 2023, and expansion of sports betting-related questions in 2024.

** Surveys conducted during the COVID-19 pandemic when school was virtual; be aware of low response rates

Problematic Gambling* Over Time, 10th/12th Grades



* "Problematic gambling" is the phrase used by the NLCLiP.

Lepper J, Haden B. Testing NLCLiP: Validation of Estimates of Rates of Non-problematic and Problematic Gambling in a Sample of British Schoolchildren. *J Gambi Stud*. 2013;29(1):15-27.

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The gambling questions on the YHS have changed over the years, including with the addition of loot boxes in 2023, and expansion of sports betting-related questions in 2024.

** Surveys conducted during the COVID-19 pandemic when school was virtual; be aware of low response rates



Thank you!

[Learn more](#) about the Springfield Youth Health Survey Initiative, including full questionnaires, methods, and responses to all questions:





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

FROM: Justin Stempeck, Deputy General Counsel
Carrie Torrisi, Chief Sports Wagering Division

DATE: May 14, 2025

RE: Prediction Markets Overview

Over the past several months there has been extensive reporting on prediction markets, primarily focusing on a company called Kalshi which is now allowing individuals to make predictions on various sporting and other real-world events. In an effort to better understand these developments this memo seeks to explain what prediction markets are, how they are regulated and some of the bigger changes in this space over the past year. This memo will not opine on the legality of prediction markets offering sports events nor discuss the detailed arguments implicating federal and state law that Kalshi is currently challenging in several federal courts.

I. What are Prediction Markets?

At their most basic, prediction markets are platforms where people can take a monetary position on a real-world future event. The type of future event can include financial (the yearly revenue of a publicly traded company), political (the presidential election), entertainment (who will win the Oscars), sport (the winner of the NBA finals) and other categories (weather, gas prices, etc.). Each event “contract” has a fundamental \$1.00 value and involves a binary choice of something happening or not happening. An individual can take a “yes” or “no” position on the contract for some fraction of the \$1.00. When the contract resolves, it pays out to the individual that was correct.

For example, imagine an event contract on whether it is going to rain every Saturday of June in Boston. If an individual buys a “yes” position on 100 contracts for 30 cents each and then it does rain every Saturday of June in Boston, the individual earns \$1 per contract, or \$100 on a \$30 investment (reflecting a \$70 profit). If the individual is wrong, they would lose their \$30. Different platforms have a variety of fee structures that the platform collects, including fees charged per contract (example: .01 per contract), percentage-based fees (charging a percentage of the contract value), profit-based fees, and withdrawal fees.



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II. Who Regulates Prediction Markets?

The Commodities Futures Trading Commission (“CFTC”) regulates the derivatives market, including many different financial instruments such as futures (including prediction markets), options, and swaps. The CFTC oversees both the trading of futures and options contracts as well as the exchanges where these trades take place.

If a company was interested in becoming a regulated prediction market in the U.S. it would need to be approved as a Designated Contract Market (“DCM”) under the CFTC. The process of becoming a DCM involves submitting a detailed application to the CFTC that outlines the applicant’s compliance with 23 core principles set forth in the Commodity Exchange Act, 7 U.S.C. § 1 et seq. Some of the more relevant principles include the following:

- **Compliance with the Law** – The exchange must follow the CEA and CFTC regulations.
- **Governance and Oversight** – It must have fair and transparent governance structures.
- **Market Transparency** – Trading information must be publicly available.
- **Fair Market Access** – The market must provide equal access to traders.
- **Prevention of Market Manipulation** – Strong surveillance mechanisms must be in place.
- **Contracts Must Be Well-Defined** – Futures and options contracts must be clear, enforceable, and financially sound.
- **Financial Integrity** – Must ensure proper risk management and margining processes.
- **Dispute Resolution** – A process for resolving market participant disputes must exist.

After approval by the CFTC, a DCM must submit regular reports to the CFTC, undergo periodic audits and inspections and adapt to rule changes and new regulatory requirements.

III. Differences between Prediction Markets and Sports Wagering

It is undisputed that prediction markets on sporting events and sports wagering share many identical characteristics. Both involve a party staking money on the outcome of a future unknown event for the chance to win a prize. The most significant difference between the two is that prediction markets provide a platform for individuals to take opposite positions on a contract whereas in sports wagering the individual is betting against the house. Similarly, in sports betting, the operator sets the odds while in prediction markets the contract prices move to reflect the likelihood of the event occurring and fluctuate based on the buying and selling of contracts during the event.

The regulation of prediction markets also differs drastically from sports wagering. After the repeal of the federal Professional and Amateur Sports Wagering Act (“PASPA”), states were



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empowered to regulate sports wagering however they saw fit. Over the past seven years since that decision, most U.S. states (38 states plus Washington D.C. and Puerto Rico) have legalized sports wagering and created their own detailed regulatory structures to govern the activity. In contrast, regulation by the CFTC is federal regulation with one regulator and one set of relatively light regulations.

CFTC regulation differs in several dramatic ways from state regulation, including the following:

- Individuals can participate in prediction markets starting at age 18 (versus 21 for sports wagering in most states),
- There are no mandatory responsible gaming features such as deposit limits, wager limits, self-exclusion tools or cooling off periods required of DCMs
- DCMs can “self-certify” new markets by simply sending a “certification” letter to the CFTC one day before offering a market and the market is automatically approved absent CFTC action
- Tax treatment of gains from event contracts differs from gambling winnings
- States receive no tax dollars from DCMs, DCMs like Kalshi are generally taxed based on their business income as a for-profit business entity
- AML standards for DCMs are not as strict as the regulated gaming space (generally not subject to the Bank Secrecy Act, no obligation to file suspicious activity reports)
- KYC protocols are minimal when compared to gaming operators (only name, address, social security number required to create account)

IV. Current Controversy

After Kalshi began offering sports events contracts on its exchange several gaming regulators sent the company cease and desist letters. To date regulators in Nevada, New Jersey, Illinois, Maryland, Ohio and Montana have sent such letters. In response Kalshi initiated litigation against Nevada, New Jersey and Maryland, winning preliminary injunctions in Nevada and New Jersey for the right to continue to offer its products as litigation continues. There are numerous complex legal arguments raised by the parties, many of which are tied to state law; however, the primary argument asserted by Kalshi is that the Commodity Exchange Act which empowers the CFTC trumps state laws on sports wagering.

The CFTC has been silent with respect to this ongoing legal battle and recently cancelled a planned roundtable with numerous parties interested in sports wagering. No explanation was provided for the cancellation.



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

FROM: Judith Young, Associate General Counsel
Justin Stempeck, Deputy General Counsel
Carrie Torrissi, Chief of the Sports Wagering Division

DATE: Thursday, May 15, 2025

RE: Sports Wagering Advertising Research: Saturation Prohibitions in the US and Abroad

Overview:

General Laws Chapter 23N, § 4(c) imparts a duty upon the Commission to promulgate regulations that restrict certain advertising, marketing, and branding practices, specifically those that are: deceptive, misleading, or false; sent as unsolicited pop-ups or texts to individuals who have self-excluded from sports wagering; considered “unacceptable or disruptive” at live sports events; specifically those that target individuals under 21 years old; or appear on billboards or public signs that violate any federal, state, or local laws.

The Commission promulgated 205 CMR 256.00 to establish standards for the advertising, marketing, and branding of sports wagering to ensure responsible practices and protect consumers, particularly minors and vulnerable populations. 205 CMR 256.08(2) specifically precludes sports wagering operators from engaging in overzealous advertising during sporting events. The regulation prohibits showing advertisements at sports events “with such intensity and frequency that they represent saturation of that medium or become excessive.” The Legal Division conducted jurisdictional research across the United States and Europe to see if other gaming regulators had examined or promulgated regulations intended to control the number of advertisements displayed during sporting events; and what constituted as “excessive.”

Ultimately, it appears that most States within the US aim to regulate the content of advertisements – with the emphasis on ensuring that the population viewing them is older than 21 years of age. Regulatory Authorities outside of the US have also regulated the content of advertisements but have also begun to outright prohibit or strictly regulate the volume of sports wagering advertisements and the timing they can be shown during sporting events, as well.



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United States:

There are currently no specific regulations governing the volume or frequency of sports wagering advertisements at the federal level. However, the American Gaming Association (AGA) has established a [Responsible Marketing Code for Sports Wagering](#), which encourages operators to maintain responsible advertising practices. While adherence to this code is voluntary, it sets industry standards aimed at promoting responsible advertising.

Our review of other US jurisdictions where sports wagering or casino gambling was legal, did not yield a definition for saturation, nor provide a specific metric regarding the number of advertisements and sports wagering operator or similarly regulated entity may display during a sporting event. A majority of states' advertising regulations take aim at governing the content of the advertisements, ensuring the proper depiction of specific subjects featured within sports wagering advertisements, or that the placement of the advertisements is proper. Very few US jurisdictions, including Virginia, and Massachusetts, have promulgated regulations that attempt to address or preclude excessive advertisements during sporting events.

Ultimately, state regulations for sports wagering advertisements fall into five main categories:

1. Restrictions on Targeting Minors (restrictions on Content, Placement, Endorsement)
2. Prohibitions on False, Misleading or Deceptive Content (Risk-Free, Can't Lose, Get Rich)
3. Required Inclusion of Responsible Gaming Messaging
4. Pre-Approval by Regulatory Bodies
5. Volume and Frequency Regulations (Amount and Frequency of Ads)

The United Kingdom "UK", and Australia:

The United Kingdom has adopted a comprehensive regulatory framework for gambling advertisements, which is overseen by the UK Gambling Commission and the Advertising Standards Authority (ASA). Key measures include a "whistle-to-whistle" ban that prohibits televised gambling ads during live sports broadcasts before 9 p.m., and strict content rules that bar ads that are likely to appeal to individuals under 18, including restrictions on using athletes or influencers under 25 within ads themselves. Advertisements must include clear, safer gambling messages, and operators are expected to adhere to the Gambling Industry Code for Socially Responsible Advertising, enforced in part by the ASA and the Industry Group for Responsible Gambling (IGRG). Notably the ban does not cover clothing sponsorships, online ads, or social media advertisements. Recent reforms, led by the Department for Digital, Culture, Media & Sport (DCMS), signal a broader shift, with growing political and regulatory momentum toward banning gambling sponsorships in sports altogether.

Australia also enforces a robust set of gambling advertising restrictions centered on time-based limitations, content controls, and protections for families and vulnerable individuals. National



Massachusetts Gaming Commission

regulations prohibit gambling advertisements during live sports broadcasts, pay-per-view events, including online streaming—between 5 a.m. and 8:30 p.m. to minimize exposure to minors who may be watching television or listening to the radio during those hours. Broadcasters at a sporting event cannot promote any gambling content that targets children or suggest they are participating in betting or gambling, exaggerate how likely someone is to be successful or win at gambling, or establish a connection between sports wagering or gambling and alcohol use. Regulatory oversight is shared between national bodies like the Australian Communications and Media Authority (ACMA) and individual state regulators that implement more specific restrictions for regions.

These enforcements are not exhaustive, however, and responsible gaming advocates have noted that the prohibitions have limitations in their overall effectiveness. Live broadcasts of thoroughbred, harness, or greyhound racing are not covered by the existing advertising restrictions in both the UK and Australia. As a result, gambling ads are often shown and seen during live sporting events that air between 5 a.m. and 8:30 p.m. in Australia. Children and young people are also still exposed to incidental forms of advertising, including logos shown at the sporting venue, and the sponsorship logos on players' uniforms. Lastly, non-live sports, such as replays of sporting events, “pre- and post-game” shows that heavily rely on showing sports footage are also exempt from the restrictions.

Conclusion

In the absence of a universally accepted definition of “saturation,” and a specific exemplar of how saturation is determined in the United States, 205 CMR 256.08(2) provides a foundational standard by prohibiting advertisements presented “with such intensity and frequency that they represent saturation of that medium or become excessive.” The threshold allows the Commission to evaluate advertising practices based on their cumulative effect on the viewing experience, including repeated exposures, the density of ads within short timeframes, that may overwhelm consumers. Drawing on international models such as the UK’s “whistle-to-whistle” ban and Australia’s time-based restrictions, the Commission could consider issuing clarification to the public on what constitutes “saturation” through guidance, examples, or enforcement criteria that take into account the number of ads per event, timing, and audience composition.

Doing so will strengthen the Commonwealth’s leadership in responsible gaming regulation and advance its goal of protecting consumers—particularly minors and vulnerable individuals—from the potential harms of overexposure to gambling promotions.



Massachusetts Gaming Commission



MASSACHUSETTS GAMING COMMISSION

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

From: Dean Serpa, Executive Director
Derek Lennon, CFAO

Date: 5/22/2025

Re: Fiscal Year 2025 (FY25) Third (3rd Q) Budget Update

Summary:

The Massachusetts Gaming Commission (MGC) approved an FY25 budget of \$59.54M for Gaming, Racing, Community Mitigation, Sports Wagering, and Research & Responsible Gaming. In the first two quarterly updates we made the following adjustments:

- Increase to the Gaming Control Fund of \$142K for additional resources to the GEU. This increase also covers the establishment of 2 new FTE positions, an Accountant 1 position in the Finance Division and a second Executive Assistant in the Commissioners' Division whose costs are split between Gaming and Sports Wagering evenly
- Increase to the Sports Wagering Control Fund of \$558.26K for consulting services for Sports Wagering Research and Analysis as well as RSM for Suitability. This increase also establishes a new Technical Compliance Coordinator in the Sports Wagering Division and covers the even split in cost with Gaming for the additional staffing for Finance the Commissioners Divisions.
- Increase to the Public Health Trust Fund of \$150K for "Bet Blocking" procurement.
- Decreased the FY25 Gaming Control Fund assessment by \$1.26M and the Sports Wagering Control Fund by \$2.24M, as a result of FY 24 carryforward savings.
- Revised the gaming assessment percentages based on proportional shares of actual gaming positions as of January 1, 2025, for the Gaming Control Fund for the second half of FY25.

As of the third quarter the total budget for the Commission is now \$60.3M.



Massachusetts Gaming Commission

Gaming Control Fund

Spending Update:

After three quarters of activity, the Commission's Gaming Control Fund has an approved budget of \$40.02M. Current spending is within projections. The Commission will continue to monitor the FY25 budget for large, budgeted item spending and some additional unanticipated costs and requests. The Commission expects to hit its FY25 LMS budgeted costs before the end of the year.

Areas that we are monitoring include the following:

- The MGC Information and Technology Division is reviewing options for hardware related to the data center move vs. cloud solutions.
- The Attorney's General Office has made a request to remove the statutory cap (MGL c. 12, § 11M) regarding its spending limit. Costs have increased since its inception.
- Additionally, the Commission was made aware of an ongoing investigation for the MSP Unit assigned to the AGO which has exceeded their budget.

The MGC Finance Office has identified areas of underspending that could be utilized to mitigate any of the potential exposures above. At this time there are no additional funds needed to cover these costs, and they remain within budgeted levels.

Revenue Update:

The FY25 Budget for the Gaming Control Fund relies on fees from licensing, fees from slot machines, and an assessment to maintain regulatory oversight of the gaming operations. Revenue is on track to meet projections. The Commission has brought in \$30.56 M through three quarters.

Racing Development and Oversight Trust

Spending Update:

Adjustments made in FY24, which carried into the FY25 budget that shifted off applicable administrative costs to Gaming and Sports Wagering, have been effective. The Racing Development and Oversight Trust Fund is within budget through the 3rd Quarter of the FY25 and these adjustments made to the FY25 budget from FY24 have not only positioned the Racing Division for the Spring Season but allowed for COLAs for the seasonal staff.

Revenue Update:

The FY25 Budget for the Racing Development Oversight Trust Fund relies on commissions, assessments, and fees from racing to maintain regulatory oversight of the racing operations. There is no need for any changes to the assessment at this time.

Sports Wagering Control Fund

Spending Update:

As of the end of Quarter 3, the Commission has an approved Sports Wagering Budget of \$11.66M. As for large expenditures, the Commission expects to expend its FY25 cost share of LMS expenses in the



Massachusetts Gaming Commission

upcoming quarter. The RSM budget was increased earlier in the year but as of the third quarter there has been savings due to the length of time for some of the necessary investigations on Licensees and for transitioning the RSM and MGC teams towards Vendor suitability. The Commission has also identified Payroll and related Fringe and Indirect savings for positions that are still in the process of being filled. These savings will be used for the applicable operational costs from the Gaming Control Fund to fulfill Sports Wagering share of services and will be shifted as necessary.

Revenue Update:

The FY25 Budget for the Sports Wagering Control Fund relies on fees from licensing, and an assessment to the operators to maintain regulatory oversight of the sports wagering operations. Revenue is well on track to exceed projections for the fiscal year. The majority of the increased revenue comes from suitability investigations. The Commission has already brought in \$10.03M through three quarters of the fiscal year.

Conclusion:

The Commission has been made aware of several unanticipated costs in relation to the Attorney General's Office as well as the required move for the data center. MGC will continue to monitor any savings across applicable operational accounts. However, the staff is pleased to report that currently there is no need for adjustments to assessments for the licensees.

Attachment A: FY25 Actuals Spending and Revenue as of 4/1/2025.



Massachusetts Gaming Commission

2025		Budget Projections						
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed
10500001--Gaming Control Fund								
MGC Regulatory Cost								
AA REGULAR EMPLOYEE COMPENSATION	\$ 8,737,689.97		\$ 19,625.00	\$ -	\$ 8,757,314.97	\$ 7,760,115.04	89%	75%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 95,994.50		\$ -	\$ -	\$ 95,994.50	\$ 24,553.38	26%	75%
CC SPECIAL EMPLOYEES	\$ 192,640.00		\$ -	\$ -	\$ 192,640.00	\$ 205,026.21	106%	75%
DD PENSION & INSURANCE RELATED EX	\$ 3,828,205.39		\$ 8,990.21	\$ -	\$ 3,837,195.60	\$ 3,403,518.31	89%	75%
EE ADMINISTRATIVE EXPENSES	\$ 708,291.92		\$ -	\$ -	\$ 708,291.92	\$ 313,498.29	44%	75%
FF PROGRAM, FACILITY, OPERATIONAL SUPPLIES	\$ 20,000.00		\$ -	\$ -	\$ 20,000.00	\$ 11,928.26	60%	75%
GG ENERGY COSTS AND SPACE RENTAL	\$ 817,235.42		\$ -	\$ -	\$ 817,235.42	\$ 680,894.28	83%	75%
HH CONSULTANT SVCS (TO DEPTS)	\$ 988,500.00		\$ (30,577.71)	\$ -	\$ 957,922.29	\$ 635,348.62	66%	75%
JJ OPERATIONAL SERVICES	\$ 12,770,229.07		\$ 142,000.00	\$ -	\$ 12,912,229.07	\$ 6,471,698.15	50%	75%
KK Equipment Purchase	\$ 62,000.00		\$ -	\$ -	\$ 62,000.00	\$ 3,370.62	5%	75%
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 65,607.90		\$ -	\$ -	\$ 65,607.90	\$ 23,753.62	36%	75%
NN NON-MAJOR FACILITY MAINTENANCE REPAIR	\$ 30,000.00		\$ -	\$ -	\$ 30,000.00	\$ 5,618.44	19%	75%
PP STATE AID/POL SUB/OSD	\$ 90,000.00		\$ -	\$ -	\$ 90,000.00	\$ 11,396.25	13%	75%
TT PAYMENTS & REFUNDS	\$ -		\$ -	\$ -	\$ -			75%
UU IT Non-Payroll Expenses	\$ 4,725,628.83		\$ -	\$ -	\$ 4,725,628.83	\$ 2,513,258.55	53%	75%
MGC Regulatory Cost Subtotal:	\$ 33,132,023.00		\$ 140,037.50	\$ -	\$ 33,272,060.50	\$ 22,063,978.02	66%	75%
EE--Indirect Costs	\$ 2,668,901.53	\$ -	\$ 1,962.50	\$ -	\$ 2,670,864.03	\$ 1,720,211.57	64%	75%
Office of Attorney General								
ISA to AGO	\$ 2,927,384.00		\$ -	\$ -	\$ 2,927,384.00	\$ 2,835,149.40	97%	75%
TT Reimbursement for AGO 0810-1024	\$ -		\$ -	\$ -	\$ -	\$ 414,292.63		75%
AGO State Police	\$ 1,070,710.24		\$ -	\$ -	\$ 1,070,710.24	\$ 715,939.88	67%	75%
Office of Attorney General Subtotal:	\$ 3,998,094.24	\$ -	\$ -	\$ -	\$ 3,998,094.24	\$ 3,965,381.91	99%	75%
ISA to ABCC	\$ 75,000.00	\$ -	\$ -	\$ -	\$ 75,000.00	\$ -	0%	75%
Gaming Control Fund Total Costs	\$ 39,874,018.77	\$ -	\$ 142,000.00	\$ -	\$ 40,016,018.77	\$ 27,749,571.50	69%	75%
2025		Revenue Projections						
Revenues	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total		
Gaming Control Fund Beginning Balance 0500	\$ -	\$ -	\$ 889,413.80	\$ -	\$ 889,413.80	\$ 889,413.80		
EBH Security fees 0500/Independent Monitor	\$ -		\$ 297,207.15	\$ -	\$ 297,207.15	\$ 297,207.15		
ENHANCED EBH Security fees	\$ 100,000.00		\$ -	\$ -	\$ 100,000.00	\$ 60,691.73		
Category/Region Collection Fees 0500	\$ -		\$ -	\$ -	\$ -	\$ -		
Prior Year Independent Monetary Fees 500	\$ -		\$ -	\$ -	\$ -	\$ -		
IEB background / investigative collections 0500	\$ 150,000.00		\$ -	\$ -	\$ 150,000.00	\$ 28,017.09		
Phase 1 Refunds 0500	\$ -		\$ -	\$ -	\$ -	\$ -		
Phase 2 Category 1 Collections (restricted) 0500	\$ -		\$ -	\$ -	\$ -	\$ -		
Region C Phase 1 Investigation Collections 0500	\$ -		\$ -	\$ -	\$ -	\$ -		
Region C Phase 2 Category 1 Collections 0500	\$ -		\$ -	\$ -	\$ -	\$ -		
Grant Collections (restricted) 0500	\$ -		\$ -	\$ -	\$ -	\$ -		
Region A slot Machine Fee 0500	\$ 1,512,000.00		\$ -	\$ -	\$ 1,512,000.00	\$ 1,549,200.00		
Region B Slot Machine Fee 0500	\$ 925,800.00		\$ -	\$ -	\$ 925,800.00	\$ 925,800.00		
Slots Parlor Slot Machine Fee 0500	\$ 564,600.00		\$ -	\$ -	\$ 564,600.00	\$ 564,600.00		
Gaming Employee License Fees (GEL) 3000	\$ 180,000.00		\$ -	\$ -	\$ 180,000.00	\$ 167,100.00		
Key Gaming Executive (GKE) 3000	\$ 10,000.00		\$ -	\$ -	\$ 10,000.00	\$ 5,000.00		
Key Gaming Employee (GKS) 3000	\$ 75,000.00		\$ -	\$ -	\$ 75,000.00	\$ 53,000.00		
Non-Gaming Vendor (NGV) 3000	\$ 50,000.00		\$ -	\$ -	\$ 50,000.00	\$ 22,400.00		
Vendor Gaming Primary (VGP) 3000	\$ 65,400.00		\$ -	\$ -	\$ 65,400.00	\$ 105,000.00		
Vendor Gaming Secondary (VGS) 3000	\$ -		\$ -	\$ -	\$ -	\$ -		
Gaming School License (GSB)/LQ	\$ -		\$ -	\$ -	\$ -	\$ 15,100.00		
Gaming Service Employee License (SER) 3000	\$ 75,000.00		\$ -	\$ -	\$ 75,000.00	\$ 28,275.00		
Subcontractor ID Initial License (SUB) 3000	\$ 15,000.00		\$ -	\$ -	\$ 15,000.00			
Temporary License Initial License (TEM)/LAB FEE 3000	\$ 10,000.00		\$ -	\$ -	\$ 10,000.00	\$ 2,000.00		
Assessment for PHTF	\$ 5,000,000.00		\$ -	\$ -	\$ 5,000,000.00			
Transfer PHTF Assessment to PHTF	\$ (5,000,000.00)		\$ -	\$ -	\$ (5,000,000.00)			
Veterans Initial License (VET) 3000	\$ -		\$ -	\$ -	\$ -			
Transfer of Licensing Fees to CMF 0500	\$ -		\$ -	\$ -	\$ -			
Assessment 0500	\$ 36,133,218.77		\$ (1,261,859.55)	\$ -	\$ 34,871,359.22	\$ 25,838,054.55		
Misc/MCC Grant	\$ -		\$ -	\$ -	\$ -			
Miscellaneous 0500	\$ 5,000.00		\$ -	\$ -	\$ 5,000.00			
Bank Interest 2700	\$ 3,000.00		\$ -	\$ -	\$ 3,000.00	\$ 5,123.14		
Grand Total	\$ 39,874,018.77	\$ -	\$ (75,238.60)	\$ -	\$ 39,798,780.17	\$ 30,555,982.46		
2025		Budget Projections						
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed
4000-1101 Research and Responsible Gaming/Public Health Trust Fund								
AA REGULAR EMPLOYEE COMPENSATION	\$ 334,980.49		\$ -	\$ -	\$ 334,980.49	\$ 274,162.18	82%	75%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 7,250.00		\$ -	\$ -	\$ 7,250.00	\$ 6,404.01	88%	75%
CC SPECIAL EMPLOYEES	\$ -		\$ -	\$ -	\$ -	\$ -	0%	75%
DD PENSION & INSURANCE RELATED EX	\$ 146,466.23		\$ -	\$ -	\$ 146,466.23	\$ 123,537.46	84%	75%
EE ADMINISTRATIVE EXPENSES	\$ 420,902.90		\$ -	\$ -	\$ 420,902.90	\$ 294,350.12	70%	75%
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 1,000.00		\$ -	\$ -	\$ 1,000.00	\$ -	0%	75%
HH CONSULTANT SVCS (TO DEPTS)	\$ 3,655,000.00		\$ -	\$ -	\$ 3,655,000.00	\$ 2,478,129.97	68%	75%
JJ OPERATIONAL SERVICES	\$ 15,000.00		\$ -	\$ -	\$ 15,000.00	\$ 1,625.47	11%	75%
KK Equipment Purchase	\$ -		\$ -	\$ -	\$ -	\$ 1,150.44	#DIV/0!	75%
MM PURCHASED CLIENT/PROGRAM SVCS	\$ -		\$ -	\$ -	\$ -	\$ -	0%	75%
PP STATE AID/POL SUB	\$ 1,320,000.00		\$ -	\$ -	\$ 1,320,000.00	\$ 630,952.14	48%	75%
UU IT Non-Payroll Expenses	\$ -		\$ 150,000.00	\$ -	\$ 150,000.00	\$ -	0%	75%
ISA to DPH	\$ -		\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
Research and Responsible Gaming/Public Health Trust Fund Subtotal:	\$ 5,900,599.62	\$ -	\$ 150,000.00	\$ -	\$ 6,050,599.62	\$ 3,810,311.79	63%	75%
2025		Revenue Projections						
Revenues	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total		
Public Health Trust Fund ISA	\$ 5,467,349.15	\$ 3,626,536.89	\$ -	\$ -	\$ 9,093,886.04	\$ 9,093,886.04		
2025		Budget Projections						
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed
10500002								
TT LOANS AND SPECIAL PAYMENTS	\$ -		\$ -	\$ -	\$ -			75%
2025		Revenue Projections						
Revenues	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed
Greyhound Balance Forward Simulcast 7200	\$ 500,000.00	\$ 817,961.43	\$ -	\$ -	\$ 817,961.43	\$ 817,961.43		
Unclaimed from Raynham and Wonderland	\$ -		\$ 274,619.14	\$ -	\$ 274,619.14	\$ -		
Plainridge Greyhound Import Simulcast 7200	\$ 5,000.00		\$ -	\$ -	\$ 5,000.00	\$ -		
Raynham Greyhound Import Simulcast 7200	\$ 20,000.00		\$ -	\$ -	\$ 20,000.00	\$ -		
Suffolk Greyhound Import Simulcast 7200	\$ 5,000.00		\$ -	\$ -	\$ 5,000.00	\$ -		
TVG Greyhound Import Simulcast 7200	\$ 5,000.00		\$ -	\$ -	\$ 5,000.00	\$ -		

TWS Greyhound Import Simulcast 7200	\$	2,000.00				\$	2,000.00	\$	-			
Wonderland Greyhound Import Simulcast 7200	\$	-		\$	-	\$	-	\$	-			
Sweep Per MGL C29513A	\$	-							(817,961.00)			
	\$	537,000.00	\$	817,961.43	\$	274,619.14	\$	-	\$	1,129,580.57	\$	0.43

Budget Projections									
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY	
10500003									
AA REGULAR EMPLOYEE COMPENSATION	\$ 611,888.13	\$ -	\$ -	\$ -	\$ 611,888.13	\$ 417,546.72	68%	75%	
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 6,000.00	\$ -	\$ -	\$ -	\$ 6,000.00	\$ 297.68	5%	75%	
CC SPECIAL EMPLOYEES	\$ 487,240.00	\$ -	\$ -	\$ -	\$ 487,240.00	\$ 262,019.65	54%	75%	
DD PENSION & INSURANCE RELATED EX	\$ 306,251.90	\$ -	\$ -	\$ -	\$ 306,251.90	\$ 191,664.59	63%	75%	
EE ADMINISTRATIVE EXPENSES	\$ 27,060.00	\$ -	\$ -	\$ -	\$ 27,060.00	\$ 22,496.71	83%	75%	
FF PROGRAMMATIC FACILITY OPERATIONAL SUPPLIES	\$ 12,000.00	\$ -	\$ -	\$ -	\$ 12,000.00	\$ -	0%	75%	
HH CONSULTANT SVCS (TO DEPTS)	\$ 10,000.00	\$ -	\$ -	\$ -	\$ 10,000.00	\$ 3,396.25	34%	75%	
JJ OPERATIONAL SERVICES	\$ 391,000.00	\$ -	\$ -	\$ -	\$ 391,000.00	\$ 220,940.48	57%	75%	
KK EQUIPMENT PURCHASES	\$ -	\$ -	\$ -	\$ -	\$ -		#DIV/0!	75%	
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 915.00	\$ -	\$ -	\$ -	\$ 915.00	\$ -	0%	75%	
NN PURCHASED CLIENT/PROGRAM SVCS	\$ 85,000.00	\$ -	\$ -	\$ -	\$ 85,000.00	\$ -	0%	75%	
NN INFRASTRUCTURE	\$ -	\$ -	\$ -	\$ -	\$ -		#DIV/0!	75%	
TT LOANS AND SPECIAL PAYMENTS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%	
UU IT Non-Payroll Expenses	\$ 4,000.00	\$ -	\$ -	\$ -	\$ 4,000.00	\$ 1,365.06	34%	75%	
EE --Indirect Costs	\$ 111,802.56	\$ -	\$ -	\$ -	\$ 111,802.56	\$ 90,223.14	81%	75%	
ISA to DPH	\$ 70,000.00	\$ -	\$ -	\$ -	\$ 70,000.00	\$ -	0%	75%	
Grand Total	\$ 2,123,157.59	\$ -	\$ -	\$ -	\$ 2,123,157.59	\$ 1,209,950.28	57%	75%	

Revenues	Revenue Projections				Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total
	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments		
Racing Oversight and Development Balance Forward 0131	\$ -	\$ -	\$ 422,474.28	\$ -	\$ 422,474.28	\$ 422,474.28
Transfer of Unclaimed Greyhound Revenue to Racing Stabilization Trust	\$ -		\$ (274,619.14)		\$ (274,619.14)	\$ -
Plainridge Assessment 4800	\$ 60,000.00		\$ -	\$ -	\$ 60,000.00	\$ 58,993.11
Plainridge Daily License Fee 3003	\$ 109,500.00		\$ -	\$ -	\$ 109,500.00	\$ 99,515.00
Plainridge Occupational License 3003/3004	\$ 50,000.00		\$ -	\$ -	\$ 50,000.00	\$ 17,305.00
Plainridge Racing Development Oversight Live 0131	\$ 25,000.00		\$ -	\$ -	\$ 25,000.00	\$ 8,024.50
Plainridge Racing Development Oversight Simulcast 0131	\$ 100,000.00		\$ -	\$ -	\$ 100,000.00	\$ 56,033.60
Raynham Assessment 4800	\$ 55,000.00		\$ -	\$ -	\$ 55,000.00	\$ 31,352.65
Raynham Daily License Fee 3003	\$ 92,700.00		\$ -	\$ -	\$ 92,700.00	\$ 55,200.00
Raynham Racing Development Oversight Simulcast 0131	\$ 75,000.00		\$ -	\$ -	\$ 75,000.00	\$ 25,622.57
Suffolk Assessment 4800	\$ 640,000.00		\$ -	\$ -	\$ 640,000.00	\$ 471,793.55
Suffolk Commission Racing Development Oversight Simulcast 0131	\$ 20,000.00		\$ -	\$ -	\$ 20,000.00	\$ 52,419.11
Suffolk Daily License Fee 3003	\$ 72,600.00		\$ -	\$ -	\$ 72,600.00	\$ 58,500.00
Suffolk Occupational License 3003/3004	\$ -		\$ -	\$ -	\$ -	
Suffolk Racing Development Oversight Live 0131	\$ -		\$ -	\$ -	\$ -	
Suffolk TVG Commission Live 0131	\$ -		\$ -	\$ -	\$ -	
Suffolk TVG Commission Simulcast 0131	\$ 420,000.00		\$ -	\$ -	\$ 420,000.00	\$ 301,243.54
Suffolk Twin Spires Commission Live 0131	\$ -		\$ -	\$ -	\$ -	
Suffolk Twin Spires Commission Simulcast 0131	\$ 200,000.00		\$ -	\$ -	\$ 200,000.00	\$ 148,837.91
Suffolk Xpress Bet Commission Live 0131	\$ -		\$ -	\$ -	\$ -	
Suffolk Xpress Bet Commission Simulcast 0131	\$ 50,000.00		\$ -	\$ -	\$ 50,000.00	\$ 52,387.49
Suffolk NYRA Bet Commission Live 0131	\$ -		\$ -	\$ -	\$ -	
Suffolk NYRA Bet Commission Simulcast 0131	\$ 100,000.00		\$ -	\$ -	\$ 100,000.00	\$ 78,066.01
AMWEST Commission Simulcast 0131						\$ 3,863.88
Transfer to General Fund 10500140 0000	\$ -		\$ -		\$ -	
Wonderland Assessment 4800	\$ -		\$ -	\$ -	\$ -	\$ 72.79
Wonderland Daily License Fee 3003	\$ -		\$ -	\$ -	\$ -	\$ 66.00
Wonderland Racing Development Oversight Simulcast 0131	\$ 2,000.00		\$ -	\$ -	\$ 2,000.00	\$ -
plainridge fine 2700	\$ 25,000.00		\$ -	\$ -	\$ 25,000.00	\$ 25,350.00
Suffolk fine 2700	\$ -		\$ -	\$ -	\$ -	
Plainridge Unclaimed wagers 5009	\$ -		\$ -	\$ -	\$ -	\$ 119,889.78
Suffolk Unclaimed wagers 5009	\$ -		\$ -	\$ -	\$ -	
Raynham Unclaimed wagers 5009	\$ -		\$ -	\$ -	\$ -	
Wonderland Unclaimed wagers 5009	\$ -		\$ -	\$ -	\$ -	
Return of Unclaimed wagers	\$ -		\$ -	\$ -	\$ -	
Misc/Bank Interest 0131	\$ 750.00		\$ -	\$ -	\$ 750.00	
Grand Total	\$ 2,097,550.00	\$ -	\$ 147,855.14	\$ -	\$ 2,245,405.14	\$ 2,087,010.77

Budget Projections								
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed
10500004								
AA REGULAR EMPLOYEE COMPENSATION	\$ 294,181.02	\$ -	\$ -	\$ -	\$ 294,181.02	\$ 165,005.26	56%	75%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 5,000.00	\$ -	\$ -	\$ -	\$ 5,000.00	\$ 1,002.91	20%	75%
DD PENSION & INSURANCE RELATED EX	\$ 131,735.34	\$ -	\$ -	\$ -	\$ 131,735.34	\$ 74,351.35	56%	75%
EE ADMINISTRATIVE EXPENSES	\$ 2,500.00	\$ -	\$ -	\$ -	\$ 2,500.00	\$ 16,500.55	660%	75%
GG ENERGY COSTS AND SPACE RENTAL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
JJ OPERATIONAL SERVICES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
KK EQUIPMENT PURCHASES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,150.44	#DIV/0!	75%
HH CONSULTANT SVCS (Grant)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
PP STATE AID/GRANTS	\$ 16,000,000.00	\$ -	\$ -	\$ -	\$ 16,000,000.00	\$ 3,412,597.36	21%	75%
UU IT Non-Payroll Expenses	\$ 50,000.00	\$ -	\$ -	\$ -	\$ 50,000.00	\$ -	0%	75%
Grand Total	\$ 16,483,416.36	\$ -	\$ -	\$ -	\$ 16,483,416.36	\$ 3,670,607.87	22%	75%
Revenue Projections								
Revenues	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total		
Balance forward prior year	\$ -	\$ 63,387,677.32	\$ -	\$ -	\$ -	\$ 63,387,677.32		
Grand Total	\$ -	\$ 63,387,677.32	\$ -	\$ -	\$ -	\$ 63,387,677.32		

		Budget Projections							
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed	
10500005									
TT LOANS AND SPECIAL PAYMENTS (Race Horse Dev Fund)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,369,290.27	#DIV/0!	75%	
Revenue Projections									
Revenues	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total			
Balance forward prior year 3003		\$ 24,244,663.95			\$ 24,244,663.95	\$ 24,244,663.95			
Race Horse Development Fund assessment 3003	\$ 25,000,000.00				\$ 25,000,000.00				
Grand Total	\$ 25,000,000.00	\$ 24,244,663.95	\$ -	\$ -	\$ 49,244,663.95	\$ 24,244,663.95			
10500008									
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	%Spent	% BFY Passed	
Casino forfeited money MGC Trust MGL 267A S4	\$ -	\$ 7,229.00			\$ 7,229.00	\$0.00	0%	75%	
Grand Total	\$ -	\$ 7,229.00	\$ -	\$ -	\$ 7,229.00				

		Budget Projections							
Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date Total	%Spent	% B/F	
10500140									
TT LOANS AND SPECIAL PAYMENTS	\$ 1,050,000.00	\$ -	\$ -	\$ -	\$ 1,050,000.00	\$ 440,223.29	42%	75%	

Row Labels	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	Actuals To Date		
						Total	%Spent	% BFY Passed
10501384								
AA REGULAR EMPLOYEE COMPENSATION	\$ 4,532,647.42		\$ 47,125.00	\$ -	\$ 4,579,772.42	\$ 1,310,582.59	29%	75%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 18,500.00		\$ -	\$ -	\$ 18,500.00	\$ 4,297.53	23%	75%
CC SPECIAL EMPLOYEES	\$ 154,000.00		\$ -	\$ -	\$ 154,000.00	\$ -	0%	75%
DD PENSION & INSURANCE RELATED EX	\$ 2,009,898.03		\$ 21,587.96	\$ -	\$ 2,031,485.99	\$ 568,464.91	28%	75%
EE ADMINISTRATIVE EXPENSES	\$ 92,350.00		\$ -	\$ -	\$ 92,350.00	\$ 40,866.11	44%	75%
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ -		\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
GG ENERGY COSTS AND SPACE RENTAL	\$ 311,353.26		\$ -	\$ -	\$ 311,353.26	\$ 5,043.03	2%	75%
HH CONSULTANT SVCS (TO DEPTs)	\$ 1,462,214.29		\$ 360,172.17	\$ -	\$ 1,822,386.46	\$ 641,397.98	35%	75%
II OPERATIONAL SERVICES	\$ 461,595.28		\$ -	\$ -	\$ 461,595.28	\$ 641,589.64	139%	75%
KK EQUIPMENT PURCHASES	\$ -		\$ -	\$ -	\$ -	\$ 10,060.45	#DIV/0!	75%
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ -		\$ -	\$ -	\$ -	\$ 162.99	#DIV/0!	75%
NN INFRASTRUCTURE:	\$ -		\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
OO ALL SPENDING CATEGORIES	\$ -		\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
OO-ISA AGO	\$ 500,000.00		\$ -	\$ -	\$ 500,000.00	\$ 168,013.66	34%	75%
TT LOANS AND SPECIAL PAYMENTS	\$ -		\$ -	\$ -	\$ -	\$ -	#DIV/0!	75%
UU IT Non-Payroll Expenses	\$ 1,041,951.94		\$ 120,000.00	\$ -	\$ 1,161,951.94	\$ 438,980.54	38%	75%
EE - Indirect Costs	\$ 520,356.13		\$ 9,379.17	\$ -	\$ 529,735.30	\$ 270,525.14	51%	75%
Grand Total	\$ 11,104,866.35		\$ 558,264.30	\$ -	\$ 11,663,130.65	\$ 4,099,984.57	35%	75%

Revenue Projections						
Revenues	Initial Projection	FY24 Balance Forward	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	Actuals To Date Total
BALANCE FORWARD PRIOR YEAR	\$ -		\$ 2,246,423.16	\$ -	\$ 2,246,423.16	\$ 2,246,423.16
SUITABILITY COSTS BALANCE FORWARD	\$ -		\$ 499,226.50	\$ -	\$ 499,226.50	\$ 499,226.50
CATERGORY 1	\$ -		\$ -	\$ -	\$ -	\$ -
CATERGORY 2	\$ -		\$ -	\$ -	\$ -	\$ -
CATERGORY 3 (TETHERED)	\$ -		\$ -	\$ -	\$ -	\$ -
CATERGORY 3 (UNTETHERED)	\$ -		\$ -	\$ -	\$ -	\$ -
SW GAMING CONTROL FUND BALANCE 0500	\$ -		\$ -	\$ -	\$ -	\$ -
REGISTRANT LICENSING FEES 3000	\$ 200,000.00		\$ -	\$ -	\$ 200,000.00	\$ 210,072.00
VENDOR SW FEES 3000	\$ 100,000.00		\$ -	\$ -	\$ 100,000.00	\$ 54,948.00
FANTASY FEES 3000	\$ -		\$ -	\$ -	\$ -	\$ -
ASSESSMENT 0500	\$ 10,654,866.35		\$ (2,246,423.16)	\$ -	\$ 8,408,443.19	\$ 5,917,530.71
FINES & PENALTIES 2700	\$ -		\$ -	\$ -	\$ -	\$ -
MISC 0500	\$ 50,000.00		\$ -	\$ -	\$ 50,000.00	\$ -
IEB BACKGROUND/INVESTIGATIVE/SUITABILITY FEES 3000	\$ 95,000.00		\$ -	\$ -	\$ 95,000.00	\$ 1,097,823.29
BANK INTEREST SW	\$ 5,000.00		\$ -	\$ -	\$ 5,000.00	\$ 4,754.65
Grand Total	\$11,104,866.35		\$499,226.50	\$0.00	\$11,604,092.85	\$10,030,778.31



MEMORANDUM

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

FROM: Nathaniel Kennedy, Enforcement Counsel, IEB

CC: Caitlin Monahan, Director, IEB
Kathleen Kramer, Chief Enforcement Counsel/ Ass. Director, IEB
Justin Stempeck, Deputy General Counsel

DATE: May 14, 2025

RE: Sports Wagering Noncompliance Matter

At the May 22, 2025 Public Meeting, the IEB will be presenting the following Sports Wagering Noncompliance matter to the Commission:

1. FBG Enterprises Opco, LLC, d/b/a Fanatics Betting and Gaming ("Fanatics") Category 3 Sports Wagering Operator, 2025-SWN-032: This matter relates to Fanatics offering wagers on the Heisman Trophy winner in contravention of 205 CMR 247.01, 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog. Fanatics accepted thirty-six (36) wagers between January 22, 2025 and March 21, 2025 for a total stake of \$545.70.



Massachusetts Gaming Commission



MEMORANDUM

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

FROM: Zachary Mercer, Sr. Enforcement Counsel, IEB

CC: Caitlin Monahan, Director, IEB
Kathleen Kramer, Chief Enforcement Counsel/Asst. Director, IEB
Justin Stempeck, Deputy General Counsel

DATE: May 13, 2025

RE: Sports Wagering Noncompliance Matter

At the May 22, 2025, Public Meeting, the IEB will be presenting the following Sports Wagering Noncompliance matter to the Commission:

1. Crown MA Gaming LLC d/b/a DraftKings, Temporary Category 3 Sports Wagering Operator, 2025-SWN-033: This matter relates to an impermissible market with an outcome dependent on the performance of an individual collegiate athlete being made available for wagering in contravention of G.L. 23N, § 3, and 205 CMR 247.01(2)(a)(1). The Operator offered wagering on the points total of a player in the Oregon v. Arizona NCAA Men's Basketball game occurring on March 23, 2025. In the time that the market was available, DraftKings accepted eighty-nine (89) wagers, with a total handle of \$1,655.00.



Massachusetts Gaming Commission



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

FROM: Tom Lam – Operations & Compliance Manager, Sports Wagering

MEMO **MEETING**
DATE: 5/12/2025 **DATE:** 5/22/2025

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 or ESPN Bet) has requested changes to their Massachusetts online house rules.

To maintain customer satisfaction, PSI is actively enhancing their house rules to provide further clarity in wager settlements through their ongoing improvement process.

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. **General Rules:** Additional language to clarify obvious errors related to team or player name. Additional language to clarify eligible participants in all markets. Additional language which involves outcomes from multiple events across different sports.
2. **Boxing:** Additional language to address a change in schedule of length times of each round and markets offered for Round or group Betting markets.



Sports Wagering Division

3. **Football:** Additional language to clarify if PAT and/or 2-Point conversion plays attribute to a player's individual game statistics and how "turnovers" are graded.
4. **Basketball:** Update to how NBA regular season league leaders are graded.
5. **Boxing:** Update to revisions for settlement clarification for abandoned, postponed and incomplete events. Revision for clarification for two markets of Fighter Winner/Fight Result and the Method of Victory markets.
6. **Hockey:** Revisions to Next Goal, Time-Based Total Goals and Team to Record Shot on Goal in the Next Two Minutes markets.
7. **Specials:** Update to how special wagers related to award ceremonies or eating contests are graded.
8. **Updated rule numbering in Boxing and Golf:** Update to rule numberings in both the boxing and golf rules.

CONCLUDING STATEMENT:

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

EXHIBIT

Additions

Section A: General Rules

18. Obvious Errors

18.5 If a Team or Player Name is misspelled due to error, but it remains obvious as to which team or player is being referenced, then all wagers stand and be graded in line with market rules.

25. General Market Rules

25.32 While we endeavor to quote all eligible participants in all markets, we may on occasion not list a player or team, or add selections to markets after the markets are first published. Patrons may request players to be added. If the winning participant is not listed, all wagers will stand and be graded as if the winning selections were offered.

26. Exclusive, Boosts and Specials

26.12 Where cross-event specials are offered on a group of events within a day, period of time, or specified game week, bets will be settled as void if one or more of the nominated events does not take place in the given time period.

Section B: Sports-Specific Rules

Boxing – General Market Rules

BX.5.5 If the scheduled length of rounds for a fight are changed e.g. reduced from 3-minute rounds to 2-minute rounds (but the number of scheduled rounds remain the same); then bets on all markets will stand.

Boxing – Specific Market Rules

BX.6.9 Round or Grouped Round Betting Markets:

For betting purposes betting on rounds or groups of rounds is for a fighter to win by KO, TKO or disqualification during that round or group of rounds. In the event of a Technical Decision before the end of the fight, all bets will be settled as a win by Points or Technical Decision. If either fighter is unable to continue or the referee and/or doctor stops the fight in between rounds, the fight will revert to the last full round.

Football – General Market Rules

FO.5.2 Player statistics accrued on a PAT or 2-Point Conversion Attempt will not contribute to a player's individual game statistics.

FO.5.3 Only an interception or fumble by the offensive team is to be deemed a 'Turnover' for grading purposes.

Updates

Section B. Sport-Specific Rules

Basketball – Futures

BB.4.10 ~~Regular Season League Leaders are graded based on rules as per the NBA/WNBA websites. Regular Season League Leaders are graded based on rules as per the NBA website.~~

Basketball – In-play

~~BB.7.1 If the match is not completed on the scheduled date, all wagers will be deemed no action and voided, except for any wagers where the outcome has already been determined at the time of suspension, abandonment, or postponement.~~

Boxing – Abandonment or postponement

BX.2.1 ~~If an event is abandoned, cancelled, or postponed without a new date for the fight, then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not take place on the same date (local time).~~

~~Where a fight is rescheduled with a new date announced, wagers will carry over the amended date. If an event is abandoned, cancelled, or postponed without a new date for the fight, then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not resume and complete by the end of the next calendar day.~~

-

~~Where a fight is rescheduled with a new date announced wagers will carry over the amended date.~~

Boxing – Incomplete Events

BX.3.3 ~~If the scheduled number of rounds in a fight is changed then all wagers already placed on Total Rounds, Round betting markets & Fight To Go The Distance will be deemed as no action and voided and all other markets stand. If the scheduled number of rounds in a fight is changed then all wagers on Total Rounds or Round betting markets will be deemed as no action and voided and all other markets stand.~~

Boxing – Specific Market Rules

BX.6.12 A Draw wager requires a draw to be declared by the judges or a draw due to a technical stoppage.

BX.6.35 Fight Winner/Fight Result markets:

If the outcomes of the market do not include a Draw, but the fight is declared as a draw, then wagers on both fighters will be voided.

BX.6.68 Method of Victory markets:

Knockout (KO) is when the boxer fails to stand up after a 10 count.

Technical Knockout (TKO) is the 3 knockdown rule or if the referee steps in. Any corner retirement will be considered a technical knockout (TKO), unless the fight is subsequently decided by the judges' scorecards, or is declared a No Contest.

Technical Decision – ~~Decision-Points~~ is on scorecard points between the judges. Technical Decision is settled by the judges' scorecards at any time other than at the end of the scheduled rounds.

Majority Decision – ~~Decision-Points~~ is on scorecard points between the judges. Majority Decision is defined as the same fighter scoring more points than the other, on two of the judges' scorecards, but the third judge scoring equally for both fighters (a draw).

Split Decision – ~~Decision-Points~~ is on scorecard points between the judges. This is defined as the same fighter scoring more points than the other on two of the judges' scorecards, but the third judge scoring the other fighter as the winner.

Unanimous Decision – ~~Decision-Points~~ is on scorecard points between the judges. Unanimous Decision is defined as the same fighter scoring more points than the other on all three of the judges' scorecards.

Disqualified Opponent – Defined as when a bout is stopped short of a KO, TKO or judges' decision because, intentionally, one or both contestants have repeatedly fouled or violated other rules, and the referee declares a disqualified boxer who as a result automatically loses the bout to the opponent.

Draw or Technical Draw - Draw is scorecard draw. Technical Draw is if the referee stops the fight before the start of the 5th round, for any reason other than Knockout, Technical Knockout or disqualification. In the event of a fight being declared a No Contest all bets will be void and stakes returned.

Ice Hockey – In-play

HO.7.2

Next Goal markets definitions: Even strength - when every team has the same number of players on the ice; Power-play - a goal is considered to be a power-play goal if the team with the numerical advantage scores; Short-handed - a goal is considered to be a short-handed goal if the team with the numerical disadvantage scores; Penalty shot - a penalty shot is considered to be a goal, if converted. If no goal is scored after the posted game score, "No Goal" will be graded as the winning wager.~~Next Goal markets definitions: Even strength – when every team has the same number of players on the ice; Power-play – a goal is considered to be a power-play goal if the team with the numerical advantage scores; Short-handed – a goal is considered to be a short-handed goal if the team with the numerical disadvantage scores; Penalty shot – a penalty shot is considered to be a goal, if converted.~~

HO.7.4 For time-based markets "Total Goals - 1st Period (00:00-04:59)" and "Total Goals - 1st Period (00:00-09:59)" the wagers refer to the first 5 and 10 minutes of the game. Starting from 0:00 and counting up until 9:59 has elapsed. Official grading of Total Goals markets uses NHL.com's official scoring summary.

For "Team To Record Shot On Goal In Next Two Minutes (20:00-18:01)" the wagers refer to the first 2 minutes of the period. Starting from 20:00 and counting down until 18:01 of time elapsed. For example, if Sidney Crosby scores a goal at 9:23 of period 1, the goal was scored 9:23 into the game (starting from 0:00), however the shot on goal resulting in the goal occurred at 10:37 of period 1 (starting from 20:00). ~~In time-based markets the periods run from :00 to :59, as applicable. For example, in the market "Goal scored in the first 10 minutes" the period starts at 00:00 and ends at 09:59.~~

Specials (e.g., Academy Awards, Oscars, Eating contests)

SP.1.1 All wagers on awards ceremonies will be graded based on the official governing body of the specified awards.
Unless otherwise stated all wagers on awards Markets ~~and~~ are deemed as action regardless of the outcome.

All wagers on award ceremonies Markets will be deemed as no action and voided if the ceremony is officially cancelled.

Update to Rule Numbering

Boxing Due to the additions and updates implemented, the rule numbering from BX.6.1 to BX.6.9 has been updated.

Golf Due to the changes implemented last quarter, the rule numbering from GF.5.10 to GF.5.17 has been updated.



Sports Wagering Division

CONCLUDING STATEMENT:

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



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
Mark Vander Linden, Director of Research & Responsible Gaming
Bonnie Andrews, Research Manager
Justin Stempeck, Deputy General Counsel

Date: May 22, 2025

Re: FanDuel Request for Permanent Waiver from 205 CMR 239.04(6)

The Commission's regulation 205 CMR 239.04(6) requires sports wagering operators to compile and maintain, and make available to the Commission upon request:

(6) Data derived from the Operator's player card/rewards card/loyalty program, player tracking software, sports wagering equipment or other similar information systems including:

- (a) The amount of money spent and lost on Sports Wagering (excluding the value of promotional credits wagered, but including any amounts that were subject to discretionary discounting for marketing or other similar purposes) by patrons who have been issued a player card or rewards card or sports wagering account, aggregated by, at a minimum, the patron's age, gender and home zip code provided by the patron and compiled on an annual basis or as otherwise directed by the Commission; and
- (b) Information, compiled by year, on player characteristics for patrons of the Operator including, but not limited to, gender, age and region of residence, player behavior including, but not limited to, frequency of wagering, amounts wagered and characteristics of sporting events and wager categories wagered on.

FanDuel is seeking a permanent waiver from this request with respect to gender data. FanDuel argues that it does not have any need for this data as an operator, that customers may have concerns with providing this data, and gender data is personal sensitive information and FanDuel



Sports Wagering Division

would be required to disclose such collection to patrons. More details regarding FanDuel's arguments can be found in the attached waiver request. FanDuel further requests that the Commission review its regulation from a policy perspective and provide additional clarity on the requirement in question.

The Sports Wagering, Responsible Gaming, and Legal Divisions recommend denying this waiver request.

While FanDuel argues that it does not have a need for this data, the Responsible Gaming Division emphasizes that gender is an important data point for the Commission to have access to for research and responsible gaming purposes. For example, Commission-funded research has found that gender is an important indicator related to both sports wagering participation and problem gambling risk (with men more likely to experience problem gambling¹ and sports wagering participation being highest among young, well-educated men,² while women were identified as a group of concern regarding potential gambling-related harm prior to sports wagering legalization in Massachusetts).²

With respect to the argument that customers may have concerns with providing this data or that certain disclosures would be required to the patrons, we have informed the sports wagering operators that compliance with this regulation may be met by (1) proactively collecting this data point by having a patron select one of several options, which could include male, female, nonbinary, other, *prefer not to say*, or any other category that an operator might identify; or (2) having the ability to provide gender data as compiled by its KYC partner, Lexis. Several of our operators have noted that they are compliant with this regulation through option two, whereby Lexis matches a patron's account registration details to public records related to that patron, which include gender information (such as information appearing on an individual's identification), and the operator is able to retrieve this data from Lexis as needed.

With respect to arguments surrounding sensitivity of data, the Legal Division disagrees with FanDuel's suggestion that gender is highly sensitive personal information. Notably, FanDuel makes no legal argument that any state or federal privacy law prevents the sharing of this information, nor do they define "sensitive personal information." "Sensitive personal information" is a term of art with varied definitions between states and countries. Critically, Massachusetts has no definition for "sensitive personal information." In addition, with respect to arguments surrounding the regulatory requirement generally and a request to review the regulation for clarity, we can certainly bring the regulation back to the Commission for further

¹ Volberg, R. A., Williams, R. J., Zorn, M., Evans, V. (2023). Gambling and Problem Gambling in Massachusetts: Results of a Follow-up Population Survey. Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

² Volberg, R.A., Evans, V., Zorn, M., Williams, R.J. (2022). Legalized Sports Betting in the United States and Potential Impacts in Massachusetts. Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.



Sports Wagering Division

discussion and review should the Commission so desire. However, the Legal Division does not believe any changes are necessary at this time. Furthermore, all other licensed Massachusetts operators have attested to their compliance with 205 CMR 239.04(6) and have not raised any concerns with respect to a lack of clarity or a need for changes to the requirement.

For these reasons, we recommend that the Commission deny FanDuel's waiver request.



MASSACHUSETTS GAMING COMMISSION WAIVER/VARIANCE REQUEST FORM

In accordance with 205 CMR 202.03; 205 CMR 102.03(4)

Please fill out and address all areas of the form with blue section headers. If a specific line does not apply to the request, please place 'NA' in the response field. Each section will extend to accommodate large answers.

CONTACT INFORMATION

DATE: 3/14/2025

NAME OF LICENSEE / OPERATOR (REQUESTING ENTITY): Betfair Interactive US, LLC d/b/a FanDuel

NAME OF INDIVIDUAL COMPILING REQUEST: Cory Fox

TITLE OF INDIVIDUAL COMPILING REQUEST: SVP, Public Policy and Sustainability

CONTACT EMAIL ADDRESS: Cory.Fox@fanduel.com

CONTACT PHONE NUMBER: 650-346-6624

EMAIL/PHONE NUMBER FOR PROVIDING DECISION (IF DIFFERENT FROM CONTACT): NA

REGULATION INFORMATION

SPECIFIC REGULATION (#) FOR WHICH WAIVER IS REQUESTED: 205 CMR 239.04(6)

REGULATION SECTION TITLE: Reports and Information to Be Compiled and Maintained by the Operator

REGULATION LANGUAGE/TEXT:

239.04(6)

The following reports and information shall be compiled and maintained by the Operator, or where applicable the Operator's holding company, intermediary company, qualifying subsidiary, or entity qualifier thereof, in the manner provided as follows or as required by the governing body responsible for the oversight of the subject information, and shall be made available and provided upon request by the Commission, or its designee:

(6) Data derived from the Operator's player card/rewards card/loyalty program, player tracking software, sports wagering equipment or other similar information systems including:



(a) The amount of money spent and lost on Sports Wagering (excluding the value of promotional credits wagered, but including any amounts that were subject to discretionary discounting for marketing or other similar purposes) by patrons who have been issued a player card or rewards card or sports wagering account, aggregated by, at a minimum, the patron's age, gender and home zip code provided by the patron and compiled on an annual basis or as otherwise directed by the Commission; and

(b) Information, compiled by year, on player characteristics for patrons of the Operator including, but not limited to, gender, age and region of residence, player behavior including, but not limited to, frequency of wagering, amounts wagered and characteristics of sporting events and wager categories wagered on.

REASON FOR REQUEST OF WAIVER

DATE(S)/ TIMEFRAME WAIVER IS REQUESTED THROUGH:

FanDuel is seeking a waiver from the requirement in 205 CMR 239.04(6) for operators to compile and maintain gender data from each customer in an aggregated internal report. FanDuel is requesting this waiver as we do not currently collect gender data from each customer that creates a Massachusetts sports wagering account. FanDuel is not requesting a waiver from any other aspect of 205 CMR 239.04(6).

Per 205 CMR 102.03(4)(b)

PLEASE EXPLAIN THE BASIS FOR THE PROPOSED WAIVER/VARIANCE SOUGHT:

On November 7, 2024, Commission staff contacted all operators, requesting that they attest to compliance with requirements to compile and maintain specific reports and information set out in 205 CMR 239.04, which primarily consist of corporate records. FanDuel provided the requested attestation on November 29, 2024, noting an exception that it does not require customers to provide gender information when registering for an account in the Commonwealth (or any other jurisdiction) and does not maintain data derived from the sports wagering system that would allow for aggregation of customer data by gender. FanDuel is requesting this waiver after subsequent conversations with staff suggesting the expectation based on the literal text of 205 CMR 239.04(6) is that operators in the Commonwealth are required to collect gender data from each and every customer – a requirement that appears to be inconsistent with the account registration requirements set out in 205 CMR 248.03, the policy expectations expressed in 205 CMR 257, and Commissioners' questions about the mandatory use of "title" fields during operators' license application presentations prior to launch.

FanDuel has several concerns with inferring a requirement for operators to collect gender data from all customers, to the extent 205 CMR 239.04(6) is read to require it solely for the purpose of compiling an internal report that would not be used by FanDuel for any purpose other than technical compliance. First, creating a sports wagering account requires more sensitive personally identifiable information ("PII") than customers are accustomed to providing when creating online accounts, and FanDuel believes it is important to only collect information that is necessary to appropriately verify their identities or otherwise engage with the platform. At a time when cybersecurity risks are ever-present, customers are appropriately concerned about the amount of information they are required to provide to operators during the account registration process. While some particularly sensitive information, like social security numbers, is necessary to provide as part of this process, FanDuel has reservations about requiring the collection of other particularly sensitive data like gender, which is not necessary for verification processes or a customer's ability to engage with a sports wagering platform. We believe it raises important and valid concerns from customers about why it is necessary for them to provide their gender to regulated sports wagering operators in order to place online sports wagers in the Commonwealth, and could limit their willingness to continue to engage with regulated sports wagering operators.



Second, we do not believe it is necessary for operators to collect gender information for purposes of verifying an account or operating a sports wagering platform. FanDuel shares the Commission's commitment to protecting the PII, confidential information, and overall privacy of our customers through a wide range of tools and internal processes; such protections for all online sports wagering customers are critical to protecting the success and reputation of the entire industry. We believe that an important aspect of that commitment is limiting the data that we collect from customers and disclosing to our customers the reason why we must collect certain data. No other legal online sports wagering jurisdiction in the US requires gender information to be collected from every customer, and other sections of the regulations call into question whether 205 CRM 239.04 was intended to create an obligation for operators to collect gender data from every customer in the Commonwealth. For example, 205 CMR 248.03(1) clearly sets out the information that is required to be collected during the account registration process. Notably, like all other jurisdictions which permit online sports wagering, the Commission determined that gender is not one of the data points necessary to be collected at the account registration stage. We do not believe the inclusion of "gender" in internal reporting obligations referenced in 205 CMR 239.04(6) was designed to override that intentional decision made during the crafting of the Commonwealth's account registration requirements.

Third, because gender data is sensitive personal information, FanDuel would be placed in an unusual position where it would be required to disclose, consistent with operators' obligations under 205 CMR 257 and other privacy laws, that this sensitive information is being explicitly collected and stored at the direction of the Commission without providing any other stated purpose to our customers. The reports and information maintained pursuant to 205 CMR 239, the majority of which are standard corporate records, are not required to be provided on any periodic basis and would only be available to the Commission upon request. It would be unusual, given the focus on cybersecurity risks and the importance of personal data protection, to require the collection and storage of sensitive personal data without any clear purpose.

Since this information would be collected at the direction of the Commission, and not for any purpose necessary for the operation of the sports wagering platform, FanDuel believes there are important policy and implementation questions that the Commission should consider and advise on during a notice and commenting rulemaking process to ensure that any data that is collected for its benefit meets its expectations and objectives. These important considerations include whether it is appropriate to require this data point to be collected, how it should be used if it is collected, and whether it must be mandatory for every customer to provide a response to participate in the Commonwealth's sports wagering industry. Over the past few months, New York went through a similar rulemaking exercise and determined that it was appropriate for operators to ask customers if they would like to voluntarily provide the information after considering industry feedback. We believe that the process facilitated meaningful differences from the current expectations in the Commonwealth for both operators and customers. To the extent the Commission believes it is important to collect this information from each customer (either directly or through information available for purchase from third-party service providers), it would also be important for the Commission to enumerate the specific types of responses that would be appropriate for a gender collection field to ensure that there is requisite consistency in the data point that is being received across operators. This would be particularly important if the purpose of collecting this information is to assess responsible gaming impacts across genders. If this is an important policy position for the Commission, we do believe that additional consideration and changes to its regulations would be appropriate.

Per 205 CMR 102.03 (4)(a)(4)

PLEASE INDICATE THE SUBSTANTIAL HARDSHIP/IMPACT YOUR ENTITY WOULD INCUR IF WAIVER/VARIANCE IS NOT APPROVED BY COMMISSION:



If the Commission does not grant this waiver, FanDuel would not be fully compliant with 205 CMR 239.04(6), since FanDuel does not currently collect gender data from each customer, and is not currently compiling internal reports identified in 239.04(6) with that data point.

ADDITIONAL JUSTIFICATION/EXPLANATION FOR REQUEST:

DETERMINATION

Pursuant to 205 CMR 102.03(4)(a), and 205 CMR 202.03(2), the Commission may waive or grant a variance if the Commission finds that:

1. Granting the waiver or variance is consistent with the purposes of M.G.L. c. 23K and c. 23N;
2. Granting the waiver or variance will not interfere with the ability of the commission or the bureau to fulfill its duties;
3. Granting the waiver or variance will not adversely affect the public interest; and
4. Not granting the waiver or variance would cause a substantial hardship to the person requesting the waiver or variance.

Pursuant to 205 CMR 102.03 (4)(c), any waiver request not acted on by the Commission within 60 days of filing shall be deemed denied.





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
Andrew Steffen, Sports Wagering Compliance and Operations Manager
Nathan Saylor, Technical Compliance Coordinator
Cristian Taveras, Gaming Technical Compliance Manager
Kevin Gauvreau, Information and Network Security Manager

Date: May 22, 2025

Re: Ballys and BetMGM Request to Approve Alternate Methods of KYC 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

Both Ballys and BetMGM use a waterfall approach to their KYC processes which include device authentication, KBA questions, and document verification, whereby KBA questions are used in some, but not all, instances. As neither Ballys nor BetMGM uses KBA questions in every KYC instance, their alternate methods of KYC must be approved by the Commission pursuant to 205 CMR 248.04(4).

Ballys and BetMGM currently have waivers from 205 CMR 248.04(4) in place through May 31, 2025. The Sports Wagering and Gaming Technical Compliance Divisions recommend that the Commission approve both Ballys and BetMGM's 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.