



NOTICE OF MEETING AND AGENDA

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

Thursday | August 18, 2022 | 10:00 a.m.
VIA REMOTE ACCESS: 1-646-741-5292
MEETING ID/ PARTICIPANT CODE: 112 499 4620

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 - #389

1. Call to Order
2. Administrative Update – Karen Wells, Executive Director
 - a. Release of Notice of Intent
 - b. Additional Updates
3. Round Table Discussion – Cathy Judd-Stein, Chair
 - I. Presentation of Initial Preparations for In-Person Sports Wagering Operations – *25 minutes*
(Each party will have 5 minutes to present)
 - A. Plainridge Park Casino – North Grounsell, General Manager
 - B. MGM Springfield – Chris Kelley, President and COO
 - C. Encore Boston Harbor – Jacqui Krum, Senior Vice President and General Counsel
 - D. Suffolk Downs – Chip Tuttle, Chief Operating Officer
 - E. Raynham Park - Steven Eichel, Attorney



Massachusetts Gaming Commission

II. Operations– *45 minutes*

- Placement/Floor Plans
- Staffing/Hiring
- House Rules
- Internal Control Submissions (Tier 1 / Tier 2 rollout)
- Security (Physical/Cybersecurity, Data, Age Restrictions, KYC, Compliance)
- Equipment and Technology (Geofencing, Kiosk Testing, IT Certifications)
- Identified Challenges and Regulatory Implications

III. Licensing Procedures – Applications, Suitability, Reciprocity–
45 minutes

- Operator License
- Occupational Licensing
- Vendor Licensing (Scoping/ Organizational Complexity/ Exemptions)
- Identified Challenges and Regulatory Implications

Lunch Break – 30 minutes

IV. Responsible Gaming and Advertising (Licensee’s Perspective) –
30 minutes

- Voluntary Self-Exclusion
- Promo Play
- Advertising/Marketing Guidelines
- Identified Challenges and Regulatory Implications

V. Timelines – *30 minutes*

- Licensee Milestones for Standing up Retail Operations
- Prioritization of Regulatory Promulgation
- Discussion of Staggered vs. Simultaneous In-Person Sports Wagering Launch

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



Massachusetts Gaming Commission

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: August 16, 2022 | 9:30 a.m.

August 15, 2022

Cathy Judd-Stein

Cathy Judd-Stein, Chair

*This meeting is open for viewing to all interested individuals.
If there are any questions pertaining to accessibility and/or further assistance is needed, please email
crystal.beauchemin@massgaming.gov.*



Massachusetts Gaming Commission

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



Notice of Intent Regarding License for Sports Wagering

The Massachusetts Gaming Commission (“MGC”) requests that entities intending to seek a license for sports wagering pursuant to G.L. c. 23N complete this notice of intent and return it by August 31, 2022. Notices may be e-mailed to mgcclerk@massgaming.gov.

Please note that returned notices, and the information contained therein, will be subject to the Massachusetts Public Records Law and may be published or released by the MGC.

This form is being requested for informational purposes only and to aid the MGC in understanding potential interest in licenses for sports wagering. This notice of intent is not to be construed as an application or request for a temporary license and does not bind the MGC in any way.

Any questions regarding the notice of intent may be e-mailed to mgcclerk@massgaming.gov.

1. Legal Name of entity:

2. Please identify type of entity:

- ☐ Holds a gaming license as defined in section 2 of c. 23K
- ☐ Licensed by the MGC in accordance with c. 128A to conduct a live horse racing meeting
- ☐ Running horse racing licensee that conducted simulcast wagering as of 12/31/20
- ☐ Greyhound meeting licensee that conducted simulcast wagering as of 12/31/20
- ☐ Offers an interactive sports wagering platform through a mobile application or other digital platform
- ☐ None of the above

3. Name of contact person:

4. Phone number of contact:

5. E-mail address of contact:

6. Name(s) of entity’s mobile application(s) or other digital platform(s):

7. Please list all jurisdictions in which the entity currently is or previously was licensed or authorized to conduct sports wagering, including but not limited to in physical sports books and

via mobile applications or other digital platforms. Please note if any licenses or authorizations are not currently valid.

8. Please list all jurisdictions in which the entity has applied for a license or authorization to conduct sports wagering, including but not limited to in physical sports books and via mobile applications or other digital platforms, and said application was rejected or withdrawn.
9. Please offer a brief description of the entity's business, including the type of business it will likely seek to conduct in the Commonwealth of Massachusetts.

Please attach separate pages as needed to answer the questions above.



INITIAL PREPARATIONS FOR RETAIL SPORTS WAGERING

Plainridge Park Casino
Aug 18, 2022



SPORTS WAGERING EXPERIENCE

- Penn Entertainment has deep experience operating retail sports wagering
 - 24 retail locations
 - 13 States
- PPC Executives are experienced, retail sports wagering operators
 - Four, prior openings between members of leadership team
 - Multiple jurisdictions
- Strong Support from Penn Entertainment
 - Project timelines
 - Job descriptions
 - Standard operating procedures
 - Best practices
 - Trouble-shooting
 - Regulatory compliance

PREPARATORY ACTIONS

COMPLIANCE

- Retail vendor list provided
 - Hardware
 - Software
 - Data feeds
 - Integrity monitoring
- Initial review of legislation

HUMAN RESOURCES

- Organizational structure defined
- Job Descriptions prepared
- Compendium updates ready for submission
- Hours of operation
- Assessment of staffing needs

DESIGN & CONSTRUCTION

- Potential temporary locations identified
- Potential permanent locations identified
- Layouts complete

OPERATIONS

- Project timeline for retail operations launch
 - Hiring timeline
 - Training guides
 - SOPs
- Hardware availability confirmed
- House rules complete

WHAT'S NEXT?

LAUNCH DATE

- Construction start-date
- Need for temporary location
- Initiation of recruiting efforts
- Goal date for equipment delivery
- Other operational decisions

LICENSING

- Occupational begins with hiring
- Vendor and Operator licensing can begin when license type and submission requirements determined
- Gathering expected information for licensing now

HARDWARE & SOFTWARE REQUIREMENTS

- Certification(s) needed
- Reciprocity agreements
- Approval to receive/stage prior to install



PENN
ENTERTAINMENT



August 9, 2022

MGM SPRINGFIELD
ONE MGM WAY
SPRINGFIELD, MA 01103

413.273.5000
MGMSPRINGFIELD.COM

Via Email

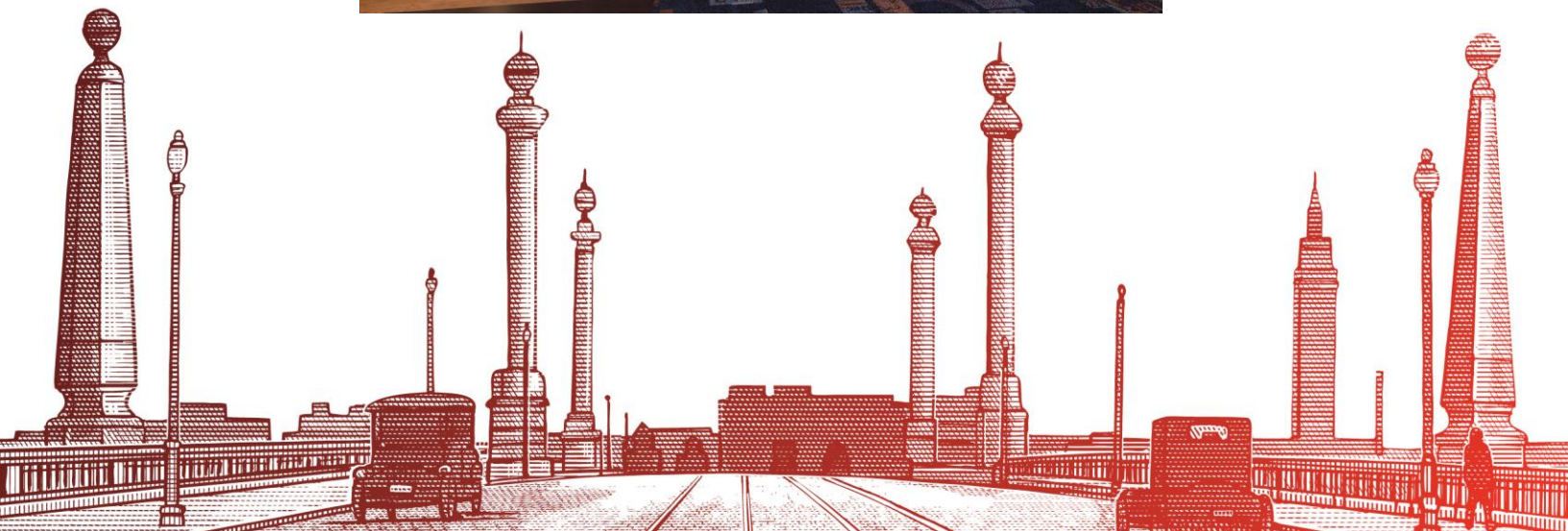
Karen Wells, Executive Director
Massachusetts Gaming Commission
101 Federal St, 12th Floor
Boston, MA 02110

Re: Sports Wagering Plan

Dear Ms. Wells:

As requested in the August 5th, 2022 call, please see MGM Springfield's (MGMS) proposed plan to open and operate in-person Sports Wagering in the event the recent related bill is signed by Governor Charles Baker, and necessary Regulations are promulgated by the Massachusetts Gaming Commission.

First, MGMS has already constructed a first-class Sports Wagering lounge with stadium seating, a 45ft viewing wall, as well as an enclosed wagering counter and space for wagering kiosks.





(Rendering created before security cage was added to wagering counter)

The area is positioned close to our Main St entrance/exit, along with many other immediately accessible gaming and non-gaming amenities, such as slots, table games, Island Bar and Costa restaurant.

Second, based on success in other jurisdictions, we look to offer in-person Sports Wagering either by staff operated points of sale at the wagering counter, or through automated kiosks. The wagering counter will be staffed by front line ticket writers, supervisors and report up through a central leader. Job postings for these positions would go live through our careers website and other public forums as soon as possible after approval. As with initial and reopening of MGMS after COVID, we may need to invite certain task force personnel from sister properties, where Sports Wagering is already approved, to assist with training and initial roll out. In the event this is necessary, we would follow the related licensing Regulations and provide the required notice and information to the IEB.

Regarding automated kiosks, wager odds and writing software is the same for these and the point-of-sale machines. This way, we can provide a consistent and fair wagering experience across the different desired channels. As shown in the pictures above, we would install automated kiosks close to the lounge. What isn't represented, but for better guest service and convenience, we would also look to install some in other locations around the gaming area.



MGM SPRINGFIELD
ONE MGM WAY
SPRINGFIELD, MA 01103

413.273.5000
MGMSPRINGFIELD.COM



Third, just like the rest of the gaming area, the Sports Wagering lounge and counter will be under continuous surveillance and patrolled regularly by our security personnel. Given the flow of cash and cash equivalents handled across the wagering counter and back-office, it will be treated and surveilled just as stringently as our main and/or satellite cages.

Fourth, as with the other types of gaming amenities we provide, Responsible Gaming is front of mind. GameSense signage will be visible throughout the area, as it is on other end caps and digital signs. All Sports Wagering related employees will go through the same types of GameSense Responsible Gaming training, that other MGMS employees do. MGMS will continue its commitments to prevention, detection and expulsion of those prohibited from accessing and gaming in this area.

Last, the rollout of this plan is largely determined by the aforementioned Governor's approval and regulatory promulgation process. However, if certain actions are able to move in parallel to those approvals, such as initiating hiring procedures right after the Governor's signature is penned, we believe MGMS could be ready to accept first wagers as early as Thanksgiving Day of 2022.

Sincerely,

Daniel Miller
Compliance Director

WynnBET Sports Book
Opening Plan

| TASK | |
|----------|---|
| 1 | Regulatory Framework |
| 1.1 | Review of Regulations |
| 1.2 | Develop Internal Controls |
| 1.3 | Determination of Gaming Area |
| 2 | Licensing |
| 2.1 | Vendor |
| 2.2 | Employee |
| 2.3 | GLI-33 |
| 2.4 | Sports Catalog (Offering) |
| 2.5 | Report Configuration |
| 2.6 | House Rules |
| 3 | INFRA - Setup |
| 3.1 | In State Servers (EBH) |
| 3.1.1 | Hardware Available |
| 3.2 | Server Config |
| 3.2.1 | Hosting Setup |
| 3.2.2 | New Client HW Setup |
| 3.2.3 | Networking |
| 3.2.4 | INFRA |
| 3.2.5 | OPS (Domain, namespace, Imperva CDN, Vault, Keycloak) |
| 3.2.6 | INFOSEC/Devs (Configure K8s Network Policies, Vault, & Keycloak) |
| 3.2.7 | OPS (Setup Infra services + Databases [client list], prod list, & access) |
| 3.2.8 | Core Sportsbook Feed Config |
| 3.2.9 | Production Environment (stand-up/testing) |
| 4 | Hiring |
| 4.1 | Director of Sports Book |
| 4.2 | Cage Cashiers |
| 4.3 | Food & Beverage |
| 5 | Training |
| 5.1 | Sportsbetting 101 |
| 5.2 | OTC |
| 5.3 | Kiosk |
| 5.4 | Kiosk Drop |
| 5.5 | Maintenance |
| 5.6 | Retail Admin |
| 5.7 | Odds Board / Digital Signage |
| 5.7 | Finance/Revenue Audit |
| 6 | Marketing |
| 6.1 | Pre-launch/Teaser |
| 6.2 | Soft Opening |
| 7 | Onsite Launch Activities |
| 7.1 | Kiosks onsite |
| 7.2 | OTC's onsite |
| 7.3 | Equipment Configuration |

| | |
|-------|---|
| 7.3.1 | Terminal Configuration (OTC & Kiosk) |
| 7.4 | Digital Signage |
| 7.4.1 | Digital Signage - Configuration & Testing |
| 7.5 | Surveillance Installation |
| 7.6 | Testing |
| 7.6.1 | Terminal Testing (OTC & Kiosk) |
| 7.7 | MGC - Testing |
| 7.7.1 | MGC Testing - On-Property @ EBH |
| 7.8 | Go-No-Go Decision |
| 7.9 | Go Live |
| 7.10 | Post Launch Support |



August 16, 2022

Ms. Cathy Judd-Stein, Chair
Commissioner Eileen O'Brien
Commissioner Bradford R. Hill
Commissioner Nakisha Skinner
Commissioner Jordan Maynard
Executive Director Karen Wells

Dear Madame Chair, Commissioners, and MGC Staff:

Thank you for the opportunity to participate in your Round Table discussion among the Commonwealth's licensees about our plans for sports betting. We appreciate the opportunity to address you on this topic and to discuss Sterling Suffolk Racecourse's current planning.

As an entity that has been processing online wagering in the Commonwealth since 2001 and in-person wagering since 1992 at a site that has offered pari-mutuel betting since 1935, we are excited to be moving forward with sports betting.

We have long believed that this history, including our strong working relationship with this Commission, would make us a logical fit for a sports wagering license, and we are grateful that the Legislature and the Governor have agreed and have put the simulcasting licensees on essentially an equal footing with the Chapter 23K gaming licensees.

Sterling Suffolk Racecourse intends to implement both the retail and mobile sports wagering rights that the new law has established for us, subject of course to the Commission's regulations. While I would like to give you a definitive program and timeline for this, our plans at this stage are preliminary and subject to change based on a variety of potential factors.

As the Commission is aware, there were stark differences between the House and Senate versions of the sports betting bill. Although we had several conversations internally about potential plans and had dozens of conversations with prospective sports book partners over the last three and a half years, only in the last two weeks after the

passage of the legislation and the clarification of what rights we may enjoy as a simulcast licensee became clear have we been able to advance this planning in a more concrete manner.


Our initial primary focus has been to secure a premier sports wagering partner to operate that segment of our business. We do not intend to operate sports betting on our own. Similar to what we have done with advanced-deposit wagering over the last 20 years under the regulatory oversight of this Commission and its predecessor agency, we are seeking to partner with a best-in-class sports book operator.

Based on the incoming contacts we have fielded over the last two weeks, there is clearly significant interest in both a Suffolk County-based retail venue and mobile license rights as well among the top sports book operators. We are retaining consultants with expertise in sports wagering partnerships and are fast-tracking our conversations with these operators in the hopes of selecting a partner or partners in the coming weeks.

We also have under consideration several attractive real estate opportunities within Suffolk County for a new, world-class retail sports book that would combine sports betting and viewing with dining, entertainment and simulcasting. We are confident that our investment in any of these options will exceed the \$7.5 million threshold over the first three years as mandated by the new statute. Our current plans contemplate exploring both short term and long term homes for our business. Due to ongoing business negotiations, we're not currently able to provide exact locations, but, again, we will update the Commission as we make progress in these discussions.

I look forward to answering any questions the Commission may have for us. As always, we thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Chip Tuttle". The signature is fluid and cursive, with the first name "Chip" and last name "Tuttle" clearly distinguishable.

Chip Tuttle
Chief Operating Officer
Sterling Suffolk Racecourse, LLC



RAYNHAM PARK

SIMULCAST CENTER

Raynham Park is pleased to be given the opportunity, under the new Massachusetts sports betting law, to be eligible for both a retail and online license.

We are currently constructing a new facility, boasting 30,000 square feet of gaming space, for sportsbook and simulcast wagering. The facility will be located on the existing parcel of land that once housed our greyhound kennels. The design includes: teller betting windows, self-service kiosks, sprawling televisions and LED board displays, theater style seating area, individual carrel seating, two expansive bars, private VIP rooms, casual and fine dining options, and innovative infrastructure and technology. The facility will be equipped with an advanced security system, as well as security personnel, to meet or exceed all MGC requirements.

As we set our sights on an early 2023 opening, we are actively communicating with a number of outside entities interested in joining our new venture, to facilitate both retail and online sports wagering.

Should the rollout of sports betting begin prior to the completion of our new facility, we will incorporate the ability to provide sports betting at our existing simulcast wagering facility.

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

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



RAYNHAM PARK

SIMULCAST CENTER

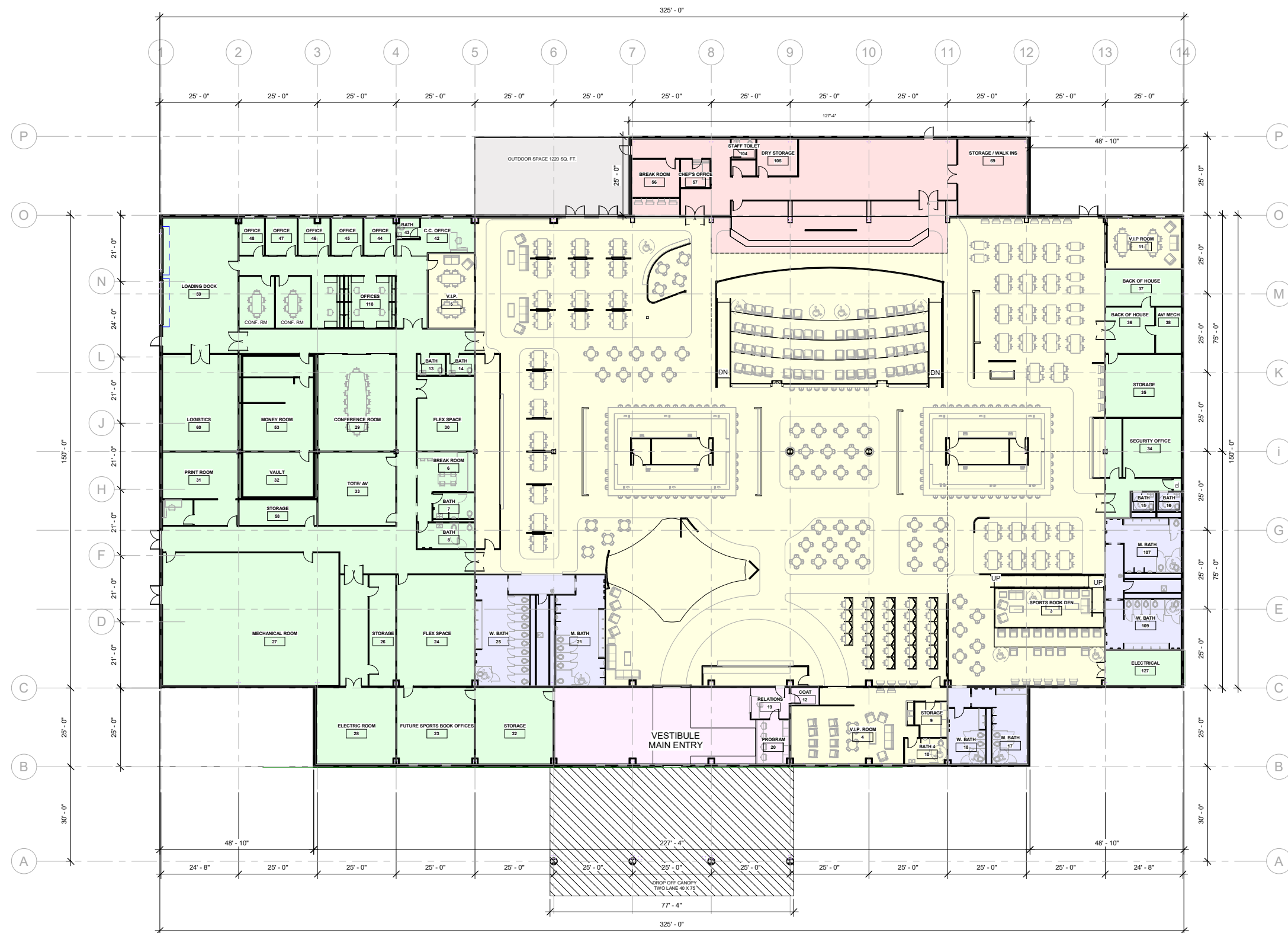
We will further expand our relationship with the Massachusetts Council on Gaming and Health and include a GameSense information center onsite to address problem gaming.






The acquisition of a sports betting license will increase the number of job opportunities in all departments. Moreover, we will maintain the jobs of our current, loyal, and dedicated employees, many who have been with us, for over thirty plus years.

We look forward to initiating the licensing process and working closely with the Massachusetts Gaming Commission to provide a state-of-the-art facility, for the residents of the Commonwealth.

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

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



-  = LOBBY
-  = PUBLIC / GAMING FLOOR
-  = RESTROOMS
-  = STAFF / BACK OF HOUSE
-  = KITCHEN / CAFE





