



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 | September 10, 2026 | 10:00 a.m.

VIA CONFERENCE CALL NUMBER: +1-213-631-9908

PHONE CONFERENCE ID: 624 498 026#

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 - #597

1. Call to Order – Jordan Maynard, Chair
2. Administrative Update – Dean Serpa, Executive Director
3. Meeting minutes
 - a. July 28, 2026 **VOTE**
 - b. August 13, 2026 **VOTE**
4. Racing – Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian
 - a. Standardbred Owners of Massachusetts Recognition-Nancy Longobardi, Secretary/Treasurer, SOM **VOTE**



Massachusetts Gaming Commission

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

5. Community Affairs Division – Derek Lennon, Chief Financial and Accounting Officer; Mary Thurlow, Senior Program Manager
 - a. MGM Springfield Q2 2026 Quarterly Report - Gus Kim, VP and Legal Counsel; Wynter Hawkins, Executive Director of Finance; Beth Ward, Director of Public Relations; Daniel Miller, Director of Compliance
6. Sports Wagering Division – Carrie Torrissi, Division Chief of Sports Wagering
 - a. Caesars’ Request for Temporary Waiver from 205 CMR 247.07 Related to the Segregation of Rewards Derived from Credit Card Purchases – Carrie Torrissi, Chief of Sports Wagering Division **VOTE**
 - b. Updates to Caesars’ House Rules - Griffin Miniutti, Compliance Officer II **VOTE**
7. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. Discussion of National Council on Problem Gaming membership – Mark Vander Linden, Director of Research and Responsible Gaming
8. Legal Division – Kevin Scanlon, General Counsel
 - a. 205 CMR 255.00: Play Management – Discussion and Review of Regulation and Small Business Impact Statement for authorization to begin the promulgation process – Autumn Birarelli, Staff Attorney **VOTE**
 - b. Approval of New Table Game Variation for Midi Baccarat and Mini Baccarat – Jenna Hentoff, Deputy General Counsel; Judith Young, Senior Associate General Counsel; Burke Cain, Gaming Agents Division Chief; Dave DiOrio, Gaming Agents Division Assistant Chief; Luis Lozano, Casino Regulatory Manager, Encore Boston Harbor **VOTE**
9. Investigations and Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
 - a. Year-End 2025 Gaming Financial Review – Yuping Huang, Financial Investigations Division
 - i. Executive Session **VOTE**
The Commission anticipates it will convene in an executive session in accordance with G.L. c.30A, §21(a)(7) to comply with G.L. c. 23K, §21(a)(7) for the specific purpose of reviewing information and reports submitted relative to Encore Boston Harbor (“EBH”); Plainridge Park



Massachusetts Gaming Commission

Casino (“PPC”); and MGM Springfield (“MGM”) relative to the Commission’s review of finances for gaming licensees in 2025. This matter is further governed by 205 CMR 139.02, as discussion of this matter in public would frustrate the purpose of the statute and associated legal authorities as the information and reports at issue are covered by nondisclosure agreements between the Massachusetts Gaming Commission and its three Gaming Licensees.

10. Litigation Update – Massachusetts Gaming Commission v. Landmark American Insurance Company – Kevin Scanlon, General Counsel

a. Executive Session

VOTE

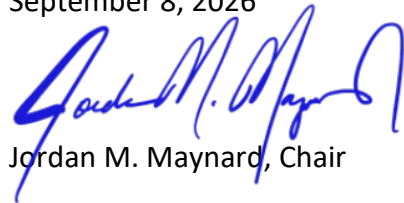
- i. The Commission anticipates it will convene in executive session in accordance with G.L. c. 30A, § 21(a)(3) to discuss strategy with respect to Massachusetts Gaming Commission v. Landmark American Insurance Company, as discussion at an open meeting may have a detrimental effect on the litigating position of the Commission.

11. Commissioner Updates

12. 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: September 8, 2026 | 10:00 a.m. EST

September 8, 2026



Jordan M. Maynard, Chair

If there are any questions pertaining to accessibility and/or further assistance is needed, please email stephanie.smith-abdoo@massgaming.gov



Massachusetts Gaming Commission

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



Massachusetts Gaming Commission Meeting Minutes

Date/Time: July 28, 2026, 10:00 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: +1-213-631-9908

PHONE CONFERENCE ID: 426 049 432#

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 Bradford Hill

Commissioner Nakisha Skinner

Commissioner Paul Brodeur

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

Chair Maynard called to order the 594th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and Chair Maynard noted that Commissioner O'Brien was not available for this meeting.

2. [Meeting Minutes](#) (00:54)

The June 25, 2026 and July 1, 2026 public meeting minutes were included in the Commissioners' Packet on pages 4 through 12.

Commissioner Brodeur moved that the Commission approve the minutes from the public meeting held on June 25, 2026 and July 1, 2026 as included in the Commissioners' Packet and subject to discussion here today, subject to any revisions for typographical errors or other non-material matters. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

3. Sports Wagering Division (01:47)

a. Category 1 Sports Wagering Operators' Request for Waiver from 205 CMR 254:
Temporary Prohibition from Sports Wagering

Compliance and Operations Manager Andrew Steffen explained that the Sports Wagering Division conducted a review and found potential ambiguity in 205 CMR 254 regarding whether the regulation applied to retail sports wagering. He stated that the Sports Wagering Division consulted each of the retail sports wagering operators and that each operator identified operational and technological limitations that prevented compliance with the requirements of 205 CMR 254. As such, the operators submitted waiver requests. *The operators' waiver requests were included in the Commissioners' Packet on pages 13 through 25.*

Manager Steffen noted that the Sports Wagering Division considered the possibility of an amendment to 205 CMR 254 but ultimately determined that waivers were the best approach at this time. He stated that the waivers could be revisited should technology advance to a point where the implementation of the temporary prohibition features outlined in the regulation could be added to retail operations. Commissioner Brodeur asked if the waivers were temporary. Manager Steffen explained that the waivers would be in place until such time as updated technology allowed compliance.

Commissioner Skinner moved that, in accordance with 205 CMR 102.03(4)(c) and 205 CMR 202.03(2), the Commission issue a waiver to Encore Boston Harbor, Plainridge Park Casino, and MGM Springfield from the requirements outlined in 205 CMR 254.00, as granting the waiver meets the requirements specified in 205 CMR 102.03(4) and is consistent with the purposes of G.L. c. 23K and G.L. c. 23N. Commissioner Hill Seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

b. FanDuel Updates to House Rules (08:15)

Manager Steffen presented proposed House Rules updates for Betfair Interactive US, LLC d/b/a FanDuel ("FanDuel"). *FanDuel's updated House Rules were included in the Commissioners' Packet on pages 26 through 28.*

Commissioner Hill moved that the Commission approve the updates to Betfair Interactive US, LLC (d/b/a FanDuel)'s House Rules as included in the Commissioners' Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

4. Investigations and Enforcement Bureau (10:27)

- a. Briefing on noncompliance matter related to Category 3 Sports Wagering Operator Caesars Sportsbook and discussion regarding next steps. Alleged noncompliance relates to offering wagering on an unapproved event in violation of 205 CMR 247.01(1), 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog.

Enforcement Counsel Diandra Franks presented a noncompliance matter related to Caesars Sportsbook (“Caesars”). The Commission reached a consensus to refer this matter back to the Investigations and Enforcement Bureau (“IEB”) for further investigation and a recommendation. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 29.*

- b. Briefing on noncompliance matter related to Category 1 Sports Wagering Operator Blue Tarp redevelopment, LLC d/b/a MGM Springfield and discussion regarding next steps. Alleged noncompliance relates to offering wagering on an unapproved event in violation of G.L. c. 23N, § 3, 205 CMR 247.01(1), 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog. (13:09)

Counsel Franks presented details regarding a noncompliance matter related to Blue Tarp reDevelopment, LLC d/b/a MGM Springfield (“MGM”) which involved wagering on the Heisman Trophy winner. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 29.*

Commissioner Skinner noted that the facts of this incident were similar to a previous noncompliance incident. Counsel Franks stated that another operator similarly offered wagering on the Heisman Trophy in prior years. The Commission reached a consensus to refer this matter back to the IEB for further investigation and a recommendation.

- c. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee BetMGM, LLC, d/b/a BetMGM (“BetMGM”) and discussion regarding next steps. Alleged noncompliance relates to BetMGM transmission of marketing materials to two individuals enrolled in the Voluntary Self-Exclusion program in violation of 205 CMR 233.06 and 205CMR 256.07 (15:58)

Enforcement Counsel Nathaniel Kennedy presented details regarding a noncompliance matter in which BetMGM, LLC d/b/a BetMGM sent advertising materials to individuals on the Voluntary Self-Exclusion (“VSE”) list. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 30.*

Commissioner Skinner sought additional details regarding the circumstances of this incident. Counsel Kennedy stated that BetMGM's marketing team used an automated marketing platform to ensure that digital communications were not sent to prohibited individuals. He noted that human error was involved where a customer relations manager inadvertently turned off the automatic system. Commissioner Skinner requested that the IEB present the next noncompliance incident involving BetMGM prior to the Commission making a decision.

d. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee BetMGM, LLC, d/b/a BetMGM ("BetMGM") and discussion regarding next steps. Alleged noncompliance relates to BetMGM transmission of marketing materials to two individuals enrolled in the Voluntary Self-Exclusion program in violation of 205 CMR 233.06 and 205CMR 256.07 (18:37)

Counsel Kennedy presented details regarding a noncompliance matter in which BetMGM sent physical advertising materials to two individuals on the VSE list. *A memorandum with details regarding this noncompliance matter was included in the Commissioners' Packet on page 30.*

Counsel Kennedy noted that physical mailers are sent based on a manual extraction process performed by BetMGM's Business Intelligence Team. He stated that the noncompliance occurred because when the marketing team received an extracted list of individuals to receive the mailer, they believed it was scrubbed of those who were not eligible to receive advertisements when rather the Business Intelligence Team believed the list would be run through BetMGM's automated marketing platform, which it was not. He stated that the two noncompliance incidents had different root causes, as one was electronic and the other was physical.

Chair Maynard asked if the issue arose from the same vendor. Counsel Kennedy stated that both incidents arose from BetMGM's internal marketing team and internal procedures for handling excluded individuals. Commissioner Brodeur asked if it was the same two individuals who received the electronic and physical communications. Counsel Kennedy noted that the matters involved separate individuals.

Noting that the Commission took the VSE program seriously, Commissioner Brodeur stated that he was comfortable referring this matter to the IEB for further investigation and a recommendation provided that any recommended sanction reflects that seriousness. Commissioner Skinner agreed with Commissioner Brodeur and asked that the IEB place an emphasis on remedial measures and corrective action during the investigation. The Commission reached a consensus to refer the two BetMGM matters back to the IEB for further investigation and a recommendation.

e. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee Penn Sports Interactive ("PSI") and discussion regarding next steps. Alleged noncompliance relates to PSI contacting an individual enrolled in a "cool-off" period in violation of 205 CMR 254.02(6) and 205 CMR 254.04 (22:46)

Enforcement Counsel Nathaniel Kennedy presented details regarding a noncompliance matter in which a PSI VIP hose contacted an individual in a “cool-off” period several times. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 30.*

Chair Maynard stated that given the facts of the situation, Commission review of this noncompliance incident at an adjudicatory hearing was appropriate. Commissioner Skinner agreed and stated that this matter would benefit from an adjudicatory hearing given the scrutiny the Commission has placed on VIP programs.

Commissioner Skinner sought clarification as to whether the IEB would be a party or a witness at the adjudicatory hearing. IEB Director Caitlin Monahan noted that the IEB had historically been a party in this type of proceeding. Chief Deputy General Counsel Justin Stempeck stated that the Commission previously discussed this process and recommended that the IEB act as a party while the Commission acts as factfinder. Commissioner Skinner stated that she supported moving forward with an adjudicatory hearing with the IEB as a party.

Commissioner Brodeur agreed with Commissioner Skinner. He noted that he viewed this incident as four violations rather than a single violation. Chair Maynard asked when the last violation occurred. Counsel Kennedy stated that the last point of contact was a text message on May 29, 2026. The Commission reached a consensus to have an adjudicatory hearing regarding this noncompliance matter.

5. Community Affairs Division (31:20)

Senior Program Manager Mary Thurlow presented two Block Grant Reallocation Requests from the City of Springfield. *The City of Springfield’s requests were included in the Commissioners’ Packet on pages 31 through 36.*

Commissioner Hill moved that the Commission approve the City of Springfield’s request to reallocate funds in the amount of \$250,000, originally granted in connection with its FY 2027 Block Grant for Main Street/Convention District Retail Recruitment Project, to fund the Central Mixed-use Parking Infrastructure Project funded in its FY 2027 Community Mitigation Fund Grant as included in the Commissioners’ Packet and discussed here today, and further moved that the Commission approve the City of Springfield’s request to reallocate FY 2026 funds in the amount of \$250,000, originally granted in connection with the Springfield Regional Visitors/Event Center project, to fund the Central Mixed-use Parking Infrastructure Project, as included in the Commissioners’ Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

6. [Commissioner Updates](#) (36:28)

Chair Maynard asked if there were any Commissioner updates and received no response. He noted that Commissioner Brodeur would be chairing the upcoming agenda setting meeting on August 5, 2026.

7. [Other Business](#) (36:51)

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

Commissioner Brodeur moved to adjourn. The motion was seconded by Commissioner Hill.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

List of Documents and Other Items Used

1. [Revised Notice of Meeting and Agenda, dated July 24, 2026.](#)
2. [Commissioner's Packet from the July 28, 2026, meeting \(posted on \[massgaming.com\]\(https://massgaming.com\)\).](#)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: August 13, 2026, 10:00 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: +1-213-631-9908
PHONE CONFERENCE ID: 454 711 710#

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 (08:30)

Chair Maynard called to order the 595th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

2. Sports Wagering Division (09:20)

- a. Petition by DraftKings to add TT Elite Series to the Event Catalog pursuant to 205 CMR 247.03(1)

Sports Wagering Compliance and Operations Manager Andrew Steffen presented a petition from DraftKings to add TT Elite Series to the Sports Wagering Event Catalog pursuant to 205 CMR 247.03(1). *A memorandum and DraftKings' petition were included in the Commissioners' Packet on pages 3 through 16.*

Commissioner Brodeur stated that he felt comfortable restoring this event to the Sports Wagering Event Catalog and thanked the Sports Wagering Division for the thoroughness of review regarding integrity concerns. Chair Maynard agreed, stating that such events should be available through regulated sports wagering operators where consumer protections are available.

Commissioner Brodeur moved that the Commission amend the Official Catalog of Events and Wagers to add TT Elite Series, as included in the Commissioners' Packet and discussed here today. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. Updates to Penn Sports Interactive House Rules (19:47)

Manager Steffen presented proposed updates to Penn Sports Interactive d/b/a theScore Bet's ("PSI") house rules. *A memorandum and PSI's updated house rules were included in the Commissioners' Packet on pages 17 through 19.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

3. Research and Responsible Gaming (22:16)

a. Equity Audit: Follow-Up from the Asian CARES Study

Director of Research and Responsible Gaming Mark Vander Linden explained that one of the findings of the Asian CARES Study was a belief that the casino strategizes its advertising and bussing in a way that leads to addiction. He noted that the study prompted the funding of an equity audit regarding the Asian community to determine whether the casinos engaged in predatory practices. He stated that this audit, the scope of which is to analyze equity and ethical concerns related to the use of buses by the casinos, was included in the FY27 research agenda. He indicated that the audit would be based on community-led research and that a request for response ("RFR") was released on July 1, 2026. *A memorandum regarding the Asian CARES Study equity audit was included in the Commissioners' Packet on pages 35 through 36.*

Director Vander Linden explained that the Commission ensures that its programs offer culturally and linguistically appropriate materials. He noted that all PlayWell brochures were translated

into a wide range of languages including traditional Chinese, simplified Chinese, Spanish, Vietnamese, and English. He further noted that the PlayWell website is available in Arabic, Haitian Creole, Japanese, Khmer, Korean, and Portuguese. He stated that the PlayWell advisors also speak a wide range of languages. He stated that the Commission strives to enhance support for communities and mitigate gambling related harm.

Chair Maynard stated that funding for the equity audit would help ensure that the Commission serves the Asian community and other communities as the Commission has a commitment to responsible gaming and gaming health. He stated that the Commission wants to create a safer place to gamble, while understanding that there is inherent risk in gambling.

Commissioner Skinner noted that the Asian CARES study had other recommendations that the Commission had worked to advance which she would like to discuss in the near future.

Commissioner Brodeur stated that responsible gaming and gaming health are evolving topics and that the Commission's knowledge will continue to improve with the evolving marketplace. He stated that the Commission would continue to research and take action when appropriate.

b. [PlayWell Fiscal Year 2026 Fourth Quarter presentation by the Massachusetts Council on Gaming and Health \(MACGH\)](#) (30:23)

The Massachusetts Council on Gaming and Health ("MACGH") Director of PlayWell Operations Ray Fluette, MGM Springfield's ("MGM") PlayWell Manager Aisha Shambley, Encore Boston Harbor's ("EBH") PlayWell Manager Jason DiCarlo, Plainridge Park Casino's ("PPC") PlayWell Manager Jolyn Barreuther, and MACGH's Director of Recovery Services Jodie Neally presented PlayWell's FY26 Q4 quarterly report, with topics including the following: interactions, voluntary self-exclusion, a secret shopper audit, and Champion Awards. *The PlayWell quarterly report presentation was included in the Commissioners' Packet on pages 20 through 34.*

4. [Legal Division](#) (56:22)

a. 205 CMR 238.33: Prohibited Persons – Discussion and Review of Regulation and Small Business Impact Statement for authorization to begin the promulgation process

Deputy General Counsel Jenna Hentoff presented a proposed amendment to 205 CMR 238.33 for initial review. *A memorandum, the redline draft of 205 CMR 238.33, and Small Business Impact Statement were included in the Commissioners' Packet on pages 37 through 40.*

Commissioner Brodeur asked whether the purpose of the amendment was to give operators clear direction regarding where to place funds confiscated as part of this process. Deputy General Counsel Hentoff confirmed that the amendment was intended to provide clarity to the operators regarding where the funds arising from wagering by prohibited persons should be deposited.

Commissioner Skinner explained that she understood the amended language was intended to be consistent with other regulatory language but that she believed that the language was ambiguous.

She stated that the phrases “in a lawful manner” and “reasonable” should be clarified throughout the regulations to clarify expectations.

Commissioner O’Brien noted that the language was elsewhere in the regulations. She asked the Legal Division to update the Commission regarding any guidance on this issue or questions received from operators or patrons. Commissioner Skinner asked the Legal Division to develop a recommendation to help clarify the language. She stated that the Commission would benefit from having a clearer understanding of the terms used and know whether it would be reasonable to claw back funds. Chair Maynard stated that the amendment was to ensure language was consistent, but if there was a problem with the practicality of the language, the phrasing would have to be changed in each regulation. He stated that it would be beneficial to know who collects the money and if improvements could be made in that process. Deputy General Counsel Hentoff stated that she would follow up with the Commission regarding additional clarifying language.

Commissioner Brodeur moved that the Commission approve the Small Business Impact Statement and the draft of 205 CMR 238.33 as included in the Commissioners’ Packet and discussed here today, and further that staff be authorized to take steps necessary to file the required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner O’Brien seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. 205 CMR 256.06: Advertising to Other Vulnerable Persons – Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption (1:05:41)

Staff Attorney Autumn Birarelli presented a proposed amendment to 205 CMR 256.06 for final review and adoption. *A memorandum, the redline draft of 205 CMR 256.06, and the Amended Small Business Impact Statement were included in the Commissioners’ Packet on pages 41 through 46.*

Commissioner Brodeur moved that the Commission approve the Amended Small Business Impact Statement and the draft of 205 CMR 256.06 as included in the Commissioners’ Packet and discussed here today, and further that staff be authorized to take steps necessary to file the required documentation with the Secretary of the Commonwealth, William Francis Galvin, to finalize the regulation promulgation process. Commissioner O’Brien seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

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

5. [Commissioner Updates](#) (1:08:32)

Chair Maynard asked if there were any Commissioner updates and received no response.

6. [Other Business](#) (1:08:38)

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

Commissioner Brodeur moved to adjourn. The motion was seconded by Commissioner Skinner.

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 August 11, 2026.](#)
2. [Commissioners' Packet from the August 13, 2026, meeting](#) (posted on massgaming.com).



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

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

DATE: September 10, 2026

RE: Standardbred Owners of Massachusetts
Recognition

Dear Commissioners:

In accordance with Massachusetts General Law Chapter 128, Section 2 (j), the Standardbred Owners of Massachusetts, Inc. (SOM) has requested they be approved as the group of representative Standardbred breeders to administer the Massachusetts Standardbred breeding program and the Breeders Stake races for 2026.

Recommendation: That the Commission approves the request of the Standardbred Owners of Massachusetts, Inc. to be recognized as the group of representative Standardbred breeders to administer the Massachusetts Standardbred breeding program and the Breeders Stake races for 2026.



Massachusetts Gaming Commission

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



STANDARD BRED OWNERS OF
MASSACHUSETTS, INC.
PO Box 1862
PLAINVILLE, MA 02762

September 1, 2026

Massachusetts Gaming Commission
Racing Division
Alexandra Lightbown
Director of Racing
101 Federal St., 12th Floor
Boston, MA 02109

Dear Director Lightbown,

Standardbred Owners of Massachusetts, Inc. respectfully requests approval to be recognized as the duly organized representative group of standardbred breeders to administer the Massachusetts Standardbred Breeding program and Breeders Stake races in accordance with Massachusetts General Law Chapter 128, sec. 2(j) for the upcoming 2026 season.

SOM, Inc. is a non-profit Massachusetts Corporation in good standing and has continuously administered the Massachusetts Breeding and Breeders Stakes program since 1992.

Sincerely,

Nancy Longobardi

Nancy Longobardi
Secretary / Treasurer

WWW.SOMINC.NET
508-528-1877
INFO@SOMINC.NET



Q2 2026 Report
Massachusetts Gaming Commission
September 10, 2026



Revenue, Taxes, Lottery and Spend Update

MGM Springfield Q2 2026





Q2 2026 Gaming Revenue & Taxes

Month	Gaming Revenue	MA Taxes
April	\$24,473,676	\$6,118,419
May	\$26,050,729	\$6,512,682
June	\$22,895,888	\$5,723,972
Total	\$73,420,292	\$18,355,073



2026 YOY Gaming Revenue & Taxes

Year	Quarter	Table Games Revenue	Slots Gaming Revenue	Total Gaming Revenue	MA Taxes
2025	Q1	\$12,906,917	\$56,317,096	\$69,224,013	\$17,306,003
	Q2	\$13,317,810	\$58,486,348	\$71,804,159	\$17,951,040
	Q3	\$13,895,059	\$57,277,469	\$71,172,528	\$17,793,132
	Q4	\$12,638,230	\$57,935,632	\$70,573,862	\$17,643,466
	Total	\$52,758,017	\$230,016,545	\$282,774,562	\$70,693,641
2026	Q1	\$14,338,301	\$57,851,653	\$72,189,954	\$18,047,489
	Q2	\$13,230,145	\$60,190,148	\$73,420,292	\$18,355,073
	Q3	\$	\$	\$	\$
	Q4	\$	\$	\$	\$
	Total	\$26,460,289	\$120,380,296	\$146,840,585	\$36,710,146





Q2 2026 Sports Wagering Revenue



Month	Taxable Revenue	Taxes
April	\$183,406	\$27,511
May	\$44,552	\$6,683
June	\$63,261	\$9,489
Total	\$291,219	\$43,683

Month	Taxable Revenue	Taxes
April	\$5,494,969	\$1,098,994
May	\$4,571,190	\$914,238
June	\$4,664,224	\$932,845
Total	\$14,730,383	\$2,946,077



Q2 2026 Lottery

Month	Lottery Sales	% Change from Previous Year
April	\$191,722	60%
May	\$213,972	57%
June	\$157,356	(14%)
Total	\$563,050	28%





2026 YOY Lottery

Year	Quarter	Lottery Sales	% Change from Previous Year
2025	Q1	\$399,038	-
	Q2	\$438,285	-
	Q3	\$557,388	-
	Q4	\$585,559	-
	Total	\$1,980,271	-
2026	Q1	\$527,122	32%
	Q2	\$563,050	28%
	Q3	\$	%
	Q4	\$	%
	Total	\$1,090,172	63%



Q2 2026 Diversity Spend

Diversity Category	Annual Goal	Q2%	Q2 Spend
MBE Vendor Spend	10%	3%	\$220,315
VBE Vendor Spend	2%	3%	\$233,813
WBE Vendor Spend	15%	7%	\$540,581
Total	27%	13%	\$994,710





2026 Local Spend

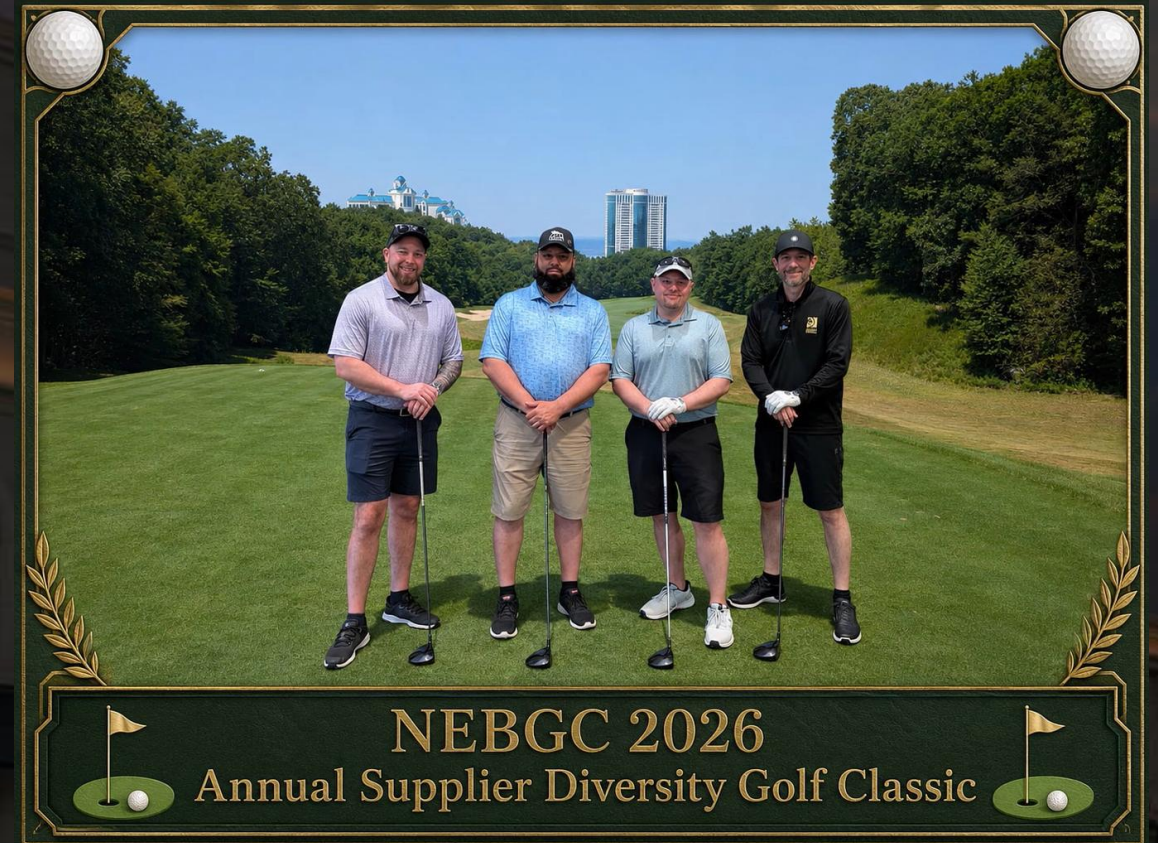
Diversity Category	Q2%	Q2 \$
Local* Vendor Spend	36%	\$2,740,227
MA Vendor Spend	40%	\$3,083,721



Q2 Procurement Efforts

Q2 Procurement Events:

- 5/15 Growth & Gather MBE Networking Event
- 6/30 NEBGC 2026 Annual Supplier Diversity Golf Classic





Compliance

MGM Springfield Q2 2026





Q2 2026 Compliance

Month	Minors intercepted in Gaming Area and prevented from Gaming	Compared to 2025	# Change	Minors intercepted gaming	Compared to 2025	# Change	Minors intercepted consuming alcohol	Compared to 2025	# Change
Apr	3	3	0	0	1	-1	1	1	0
May	0	6	-6	0	0	0	0	0	0
Jun	1	2	-1	4	0	4	0	0	0



Longest time in Gaming Area – 1 hour 34 minutes

Shortest time in Gaming area – 8 minutes

All underage found within the Gaming Area, were between the ages of 18 – 20.



Employment

MGM Springfield Q2 2026





2026 Employment Numbers

2026	Goals	Q1 2026 %	Q1 2026 Total # of Employees	Q2 2026 %	Q2 2026 Total # of Employees	Q3 2026 %	Q3 2026 Total # of Employees	Q4 2026 %	Q4 2026 Total # of Employees
Minority	50%	55%	903	55%	883	%		%	
Veteran	2%	4%	68	4%	68	%		%	
Women	50%	40%	664	40%	639	%		%	
Springfield Residents	35%	38%	630	39%	628	%		%	
Western MA Residents	-	76%	1,257	75%	1,211	%		%	
MA Residents	-	77%	1,282	77%	1,233	%		%	
Total # Of Gaming Establishment Employees*	-		1,655		1,611				
Full Time	-		1,003		964				
Part Time	-		393		383				
On Call	-		259		264				

*MGM Springfield Sportsbook currently employs 8 team members.





Q2 Workforce & Hiring Initiatives

Presentations to Students of:

- WayFinders – Employer Spotlight
- Nourish-Your-Career – New Cook Cohort
- Manchester Community College Hospitality/Hotel Program

Property Tours to Students of:

- HCC-MGM Hotel Program
- South Hadley High School
- UMass Hotel & Tourism Management

Career Fairs at:

- BayPath University
- MassHire Springfield Recruitment Corner
- MasHire Holyoke Hot Jobs
- WayFinders Coffee & Connections
- HCC-MGM Culinary Arts Institute
- ROCA's Shoot Your Shot

Workforce Development:

- Manchester Community College Advisory Board Meeting
- Putnam High School Culinary Advisory Board Meeting
- Job Corps Employer Rountable
- Professional Women's Group Workshop (Dress For Success)





Community Outreach & Special Events

MGM Springfield Q2 2026





Q2 Community Outreach & Special Events



Packed & Donated 600+ Lunches for Revitalize CDC



Revitalize Springfield GreenNFit



AED Donation to the YMCA of Greater Springfield



Springfield Public Schools Donation





Q2 Community Outreach & Special Events



Memorial Day Flagging



Wine Safari to Benefit the Zoo in Forest Park



Grocery Distribution with the United Way



Springfield Pride Parade





Q2 Community Outreach & Special Events

Partnered with Hunger Relief Organizations:

- Served over 1800 meals to local homeless
 - Friends of the Homeless
 - Loaves and Fishes
- Distributed hundreds of grocery bags with the United Way
 - Free grocery subsidization for local families

Proud Community Sponsors (Cash Donations):

- Springfield Puerto Rican Parade
- Dress for Success
- Springfield Public Schools
- Springfield Pride Parade
- Bureau of Exceptional Children

2026 Grant Recipients:

- | | |
|----------------------------------|-----------------------------|
| ➤ The Literacy Project | ➤ Clinical Support Services |
| ➤ Just Roots | ➤ Tech Foundry |
| ➤ Highland Valley Elder Services | ➤ Ellie Fund |
| ➤ Scouting America | ➤ YWCA |
| ➤ Rachel's Table | ➤ Revitalize CDC |
| ➤ Food Bank of Wester Mass | ➤ Shoes That Fit |



➤ Gamers Outreach



PAY TO THE
ORDER OF

Local Nonprofits

One Hundred & Eighty Thousand

DATE: **2026**

\$180,000

DOLLARS



FOR *Community & Corporate Grants*

SIGN *MGM Springfield*



Q2 Community Outreach & Special Events



May the 4th Be With You



Big Brother Casting Call





Entertainment

MGM Springfield Q2 2026





Q2 Entertainment at MassMutual Center

YOGA

on the Landing

FREE COMMUNITY YOGA SERIES

SUNDAYS 11AM - 1PM | MAY 24TH, JUNE 21ST, JULY 19TH

YOGA WITH
Christina Lam

SPRINGFIELD DOWNTOWN

PRESENTED BY
Lia
Honda Enfield

SUMMER CONCERT SERIES

LAWN PARTY @ THE LANDING

★ MASSACHUSETTS CONVENTION CENTER AUTHORITY ★

FOOD TRUCKS • LIVE BANDS • GAMES • DRINKS

THURSDAYS 4:30-7:30PM
ALL SUMMER LONG

FREE ALL AGES

JUN 04	NORTHBOUND GRATEFUL DEAD JAM BAND
JUN 11	SAVAGE BROTHERS 6-PIECE PUNK BAND
JUN 18	JOE MACEY ACOUSTIC / SINGER-SONGWRITER
JUN 25	ETHEL LEE & THE CRIC BASCOM QUINTET JAZZ / BLUES
JUL 02	CAROL DIVINE & THE MIGHTY FINE CLASSIC SOUL / FUNK / MOTOWN / ROCK
JUL 09	JARREAU PITTS R&B / POP / SOUL
JUL 16	NOW THAT'S 90'S 90'S COVER BAND
JUL 23	LA ERA DEL MAMBO LATIN / SALSA / MAMBO / MERENGUE
JUL 30	TRAILER TRASH COUNTRY / COUNTRY ROCK / PARTY BAND
AUG 06	TAFARI REGGAE / ROOTS REGGAE / CARIBBEAN
AUG 13	BRASS ATTACK BRASS BAND / FUNK
AUG 20	WHISKEY TRAVELER AMERICAN / COUNTRY
AUG 27	DEEP RIVER RAMBLERS BLUEGRASS / AMERICAN

ALL SHOWS WEATHER PERMITTING. SCHEDULE SUBJECT TO CHANGE WITHOUT NOTICE. VISIT MASSMUTUALCENTER.COM FOR MORE INFO.

LEARN MORE →

DOWNTOWN SPRINGFIELD farmers' market

LOCAL • FRESH • UNIQUE

PRESENTED BY countrybank

LOCAL FARMERS • VENDORS • MUSIC • FOOD TRUCKS

FRIDAYS 11AM TO 3PM
JUNE - AUGUST

THE LANDING AT MASSMUTUAL CENTER

THE UP UP DOWN DOWN TOUR

YELLOWCARD

NEW FOUND GLORY
PLAIN WHITE T'S

SATURDAY, JUNE 20
MASSMUTUAL CENTER

MGM

SOCCER WATCH PARTY @ THE LANDING

MASSACHUSETTS CONVENTION CENTER AUTHORITY

SATURDAY, JUNE 13

QATAR	VS	SWITZERLAND
BRAZIL	VS	MOROCCO

FRIDAY, JUNE 19

USA	VS	AUSTRALIA
SCOTLAND	VS	MOROCCO

SATURDAY, JULY 11 - QUARTER FINALS
5 PM - TBD VS. TBD

SUNDAY, JULY 19 - CHAMPIONSHIP FINAL
3 PM - TBD VS. TBD

FREE EVENT • ALL AGES • Food Trucks • Drinks • Games • Mini Golf July 11

WATCH THE WORLD'S LARGEST SOCCER MATCHES LIVE ON THE OUTDOOR BIG SCREEN

THE WORTHY BREWFEST

PRESENTED BY BeaconBank

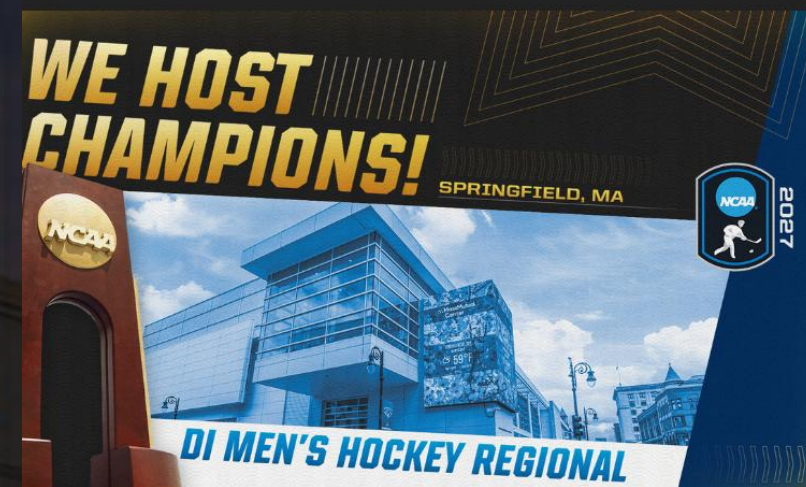
06.27.26

THE LANDING

SPRINGFIELD DOWNTOWN
A SPRINGFIELD DOWNTOWN EVENT



Upcoming Entertainment at MassMutual Center



Coming Soon:

- Globetrotters – December 29
- Monster Trucks – January 9
- Disney on Ice – March 18-21

Thunderbirds:

- Mondays: 1 game
- Tuesdays: 1 game
- Wednesdays: 5 games
- Fridays: 8 games
- Saturdays: 14 games
- Sundays: 7 games





Q2 Entertainment at MGMS & Symphony Hall

FREE MUSIC FRIDAYS
LIVE ON THE PLAZA

SPECIAL THANKS TO OUR 2026 PRESENTING SPONSORS

THE BIG E
Presented by Eastern States Exposition

H
HAYMOND LAW FIRM

SUN CRUISER

DATE	ARTIST	TRIBUTE TO
MAY 22	TRAILER TRASH	TRAVIS & MATTEN COUNTRY MUSIC
MAY 29	THE BLUSHING BRIDES	THE ORIGINAL TRIBUTE TO THE HOLLING STONES
JUN 05	PETTY LARGENY	NEW ENGLAND'S TOP TOP PETTY TRIBUTE
JUN 12	CRUSH	DAVE MATTHEWS TRIBUTE BAND
JUN 19	REDNECK CASTAWAY BAND	A TRIBUTE TO ACACIA DREAM
JUN 26	BILLY AND THE JETS	PLAYING THE HITS FROM ELYON JOHN & BILLY JOEL
JUL 03	HEARTLAND	CLASSIC ROCK, YOU LOVE IT, CLASSICS YOU CAN'T LIVE WITHOUT
JUL 10	BLIZZARD OF OZZ	THE MOST AUTHENTIC TRIBUTE TO THE PRINCE OF DARKNESS
JUL 17	SIMPLY THE BEST	A TRIBUTE TO WOMEN WHO ROCKED THE 80'S
JUL 24	MALADO	SPRINGFIELD'S TOP BAND IN BAR, PUNK AND MORE!
JUL 31	RAQUEL & SU NUEVO IMPACTO	LA BANDA DE LA VIEJA DE LOS 70'S "THE LADY WITH THE GOLDEN VOICE"
AUG 07	BACK IN BLACK	THE TRUE ACIDIC EXPERIENCE
AUG 14	THE WARPED BAND	THE ORIGINAL TRIBUTE TO THE WARPED TOUR
AUG 21	BELOW DECK	YACHT ROCK FAVORITES
AUG 28	E STREET SHUFFLE	FROM ABBAY PAUL, NEW JERSEY, A TRIBUTE TO THE MUSIC
SEP 04	MOONDANCE	THE ULTIMATE VAN MORRISON TRIBUTE CONCERT
SEP 11	AQUANETT	TRIBUTE TO 80'S ROCK & METAL
OCT 09	CATHEDRAL	THE MOST AUTHENTIC TRIBUTE TO THE MUSIC OF EDDIE VAN HALEN
OCT 16	DOOKIE	AMERICA'S PREMIER GREEN DAY TRIBUTE
OCT 23	JOHNNY SIX GUN	AUTHENTIC CLASSIC ROCK THE WAY YOU REMEMBER IT

FUN STARTS AT 6:00PM & MUSIC KICKS OFF AT 7:30PM
ALL SHOWS WEATHER PERMITTING. SCHEDULE SUBJECT TO CHANGE WITHOUT NOTICE. VISIT MGMSPRINGFIELD.COM FOR ADDITIONAL INFO.

Cinderella's TOM KEIFER BAND 2026

MAY 23

SYMPHONY HALL
SPRINGFIELD

SPECIAL GUESTS
Buckcherry

BRAD WILLIAMS
THE TALL TALES
TOUR '26

SATURDAY, MAY 30, 2026
SPRINGFIELD SYMPHONY HALL
MGMSPRINGFIELD.COM

SYMPHONY HALL

THERESA CAPUTO
MAY 29

Theresa Caputo
LIVE
'THE EXPERIENCE'

FROM **Lifetime** RAISING SPIRITS AND **ABC** LONG ISLAND MEDIUM



Upcoming Entertainment at MGM Springfield



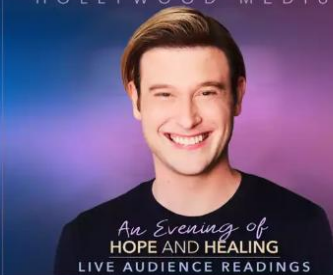
VOYAGE
CELEBRATING THE MUSIC OF JOURNEY

MGM
SPRINGFIELD

ARIA BALLROOM
OCTOBER 24

STAR OF **NETFLIX** LIFE AFTER DEATH AND LIVE FROM THE OTHER SIDE

TYLER HENRY
HOLLYWOOD MEDIUM



*An Evening of
HOPE AND HEALING*
LIVE AUDIENCE READINGS



**MARLON
WAYANS**
NOV 14

MGM
SPRINGFIELD

ARIA BALLROOM



FREE MUSIC FRIDAYS
LIVE ON THE PLAZA

MGM
SPRINGFIELD

**OCT. DATES
ADDED!**



RCAR!

BEN BANKAS!
**4 SHOWS- SOLD
OUT!**

Carhartt
DELICATESSEN

DECEMBER 18 · MGM SPRINGFIELD · ARIA BALLROOM

MOST WANTED
2026 TOUR



AUSTRALIA'S
**THUNDER
DOWN UNDER**
GIRLS' NIGHT OUTBACK



Thank-you





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

FROM: Carrie Torrisi, Chief of Sports Wagering Division

DATE: September 10, 2026

RE: Caesars' Request for Temporary Waiver from 205 CMR 247.07

The Commission's regulation 205 CMR 247.07 states that "[a] Sports Wagering Operator shall prohibit any use of credit cards, either directly or indirectly, including without limitation through an account funded by a credit card, in placing sports wagers."

Commission staff became aware that Caesars permitted rewards derived from purchases made with its Caesars credit card to be used to fund sports wagering accounts in Massachusetts. After review by Sports Wagering, Legal, and the IEB, Commission staff advised Caesars that permitting such reward dollars to be used to fund a sports wagering account would violate the Commission's prohibition on indirectly funding an account via credit. Caesars has agreed to segregate these funds such that they will not be available to use for wagering in Massachusetts.

Caesars has requested a temporary waiver from the prohibition on indirect credit card funding outlined in 205 CMR 247.07 specifically as it relates to rewards derived from the Caesars credit card until December 31, 2026. Caesars has explained that they require this time to develop, test, and implement a segregation tool such that the rewards will not be available for wagering in Massachusetts.

Given the technical components necessary to implement this requirement, we recommend that the Commission grant Caesars a temporary waiver from 205 CMR 247.07 specifically as it relates to the segregation of rewards derived from the Caesars credit card through December 31, 2026.



Massachusetts Gaming Commission



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: 8/20/2026

NAME OF LICENSEE / OPERATOR (REQUESTING ENTITY): Caesars Sportsbook/American Wagering, Inc.

NAME OF INDIVIDUAL COMPILING REQUEST: Robert Ross

TITLE OF INDIVIDUAL COMPILING REQUEST: *Of Counsel*, Greenberg Traurig, LLP

CONTACT EMAIL ADDRESS: bob.ross@gtlaw.com

CONTACT PHONE NUMBER: 617-310-5299

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

REGULATION INFORMATION

SPECIFIC REGULATION (#) FOR WHICH WAIVER IS REQUESTED: 205 CMR 247.07

REGULATION SECTION TITLE: Acceptance of Sports Wagers

REGULATION LANGUAGE/TEXT: "(7) A Sports Wagering Operator shall prohibit any use of credit cards, either directly or indirectly, including without limitation through an account funded by credit card, in placing Sports Wagers."

REASON FOR REQUEST OF WAIVER

DATE(S)/ TIMEFRAME WAIVER IS REQUESTED THROUGH: December 31, 2026

Per 205 CMR 102.03(4)(b)

PLEASE EXPLAIN THE BASIS FOR THE PROPOSED WAIVER/VARIANCE SOUGHT: Caesars Sportsbook has operated its nationwide Rewards Program since at least February of 2023, when it received its temporary license from the Massachusetts Gaming Commission ("MGC"). Earlier this year, the MGC notified Caesars Sportsbook that the MGC believed that an aspect of the Caesars Rewards program's credit card benefits may not comply with 205 CMR 247.07. Caesars Sportsbook worked closely with counsel to analyze the relevant law and believed that the provisions in question



did not prohibit the application of the credit card rewards. Through further dialogue with the MGC, Caesars Sportsbook further understood the MGC's position and is modifying the Company's credit card rewards program accordingly. Such a modification will require developing a state-specific work-around. Caesars Sportsbook anticipates that developing this change, which is already in progress, will require additional months of implementation time and costs to test and deploy successfully. Caesars Sportsbook anticipates that it will be able to implement a work-around by December 31, 2026. Caesars Sportsbook also believes that in the interim, the Caesars Rewards program can continue as customers have been accustomed since Caesar's received its temporary sports wagering license. Accordingly, there is no adverse impact to the public from continuing the Program rules unchanged to allow for the proper development and implementation of a business solution to a state-specific workaround. Moreover, this time will allow Caesars Sportsbook time to communicate with its customers about the coming changes.

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:

Caesars Sportsbook requires time to develop, test and implement a business solution. If a waiver is not approved, then Caesars Sportsbook will be unable temporarily to conform to the Commission's interpretation of the regulation, potentially creating an inadvertent violation. Having to implement such a business solution according to this deadline will cause Caesar's Sportsbook to incur substantially increased costs and will inevitably cause disruption to Caesars Sportsbook's Massachusetts customers.

ADDITIONAL JUSTIFICATION/EXPLANATION FOR REQUEST:

Caesars Sportsbook asks that it be allowed to continue to operate its Rewards Program as its Massachusetts customers currently experience it for a short time, under the program rules that were in effect when the Commission granted Caesar's Sportsbook its permanent license, so that Caesars Sportsbook can minimize future disruption for its Massachusetts customers and can properly prepare those customers for the coming changes.

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

FROM: Griffin Miniutti – Compliance Officer II, Sports Wagering

MEMO **MEETING**
DATE: 9/8/2026 **DATE:** 9/10/2026

RE: Update to Caesars Sportsbook House Rules

REGULATION BACKGROUND:

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

EXECUTIVE SUMMARY:

Caesars Sportsbook has submitted revisions to their Massachusetts online House Rules. A 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 Betting Rules:** Added language to further outline the settlement policy for scenarios wherein the market winner of an event was not available for selection at the time of bet placement.
2. **Auto Racing & Motorbikes:** 2 new market offerings added, allowing for wagering based on the outcome of a specified race or lap.
3. **Cricket:** 5 new market offerings added, offering markets such as highest individual score and the total runs after a specified number of overs.
4. **Hockey:** General rules language revised for increased clarity, 1 new market added allowing for wagering on the result of a game after the point spread is applied to both teams.



Sports Wagering Division

5. **Soccer:** 7 new market offerings added, allowing for wagering based on the phase of a competition/tournament that a specified team will reach. 1 redundant market retired.
6. **Tennis:** 3 new market offerings added, allowing for wagering based on the serving performance of a player in a specified set.

CONCLUDING STATEMENT:

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

Exhibit

Revisions:

GENERAL BETTING RULES

EVENTS ON WHICH WAGERS ARE ACCEPTED

- If a selection that ultimately wins was not available for wagering at the time of bet placement, all remaining wagers on the market will stand as written.

AUTO RACING & MOTORBIKES

Driver/Constructor Matchup - End of Lap X

- Predict which of the two named selections will finish in the highest place at the end of the specified lap.
- Should both drivers/constructors be disqualified before or during the specified lap, then that matchbet will be considered void.
- Both drivers/constructors must start the named lap or else wagers on the matchbet will be void.

Both Team Drivers to Finish/Complete the Race

- Predict that both drivers from a named team finish/complete the specified race.

CRICKET

Total Runs After X Overs

- Predict how many runs the named team will score in the specified number of overs.
- Penalty runs added to the team total will count.
- In Limited Overs matches, if the scheduled number of overs is reduced due to weather or any other delay, then wagers will be void unless a winning market has already been determined.

Highest Individual Score

- Predict whether the highest individual score of any single player in the match, is over or under a specified number.
- Both teams must play at least 80% of their originally scheduled overs for bets to stand.

Highest Scoring Over

- Predict whether the highest score in a single over is over or under a specified number.
- Both teams must play at least 80% of their originally scheduled overs for bets to stand.

Player Total Fours/Sixes

- Predict whether a named batsman will score higher or lower than a specific total boundary fours/sixes.
- If a player retires hurt, wagers will be void unless the player is subsequently out, or their final number of fours/sixes is greater than the quote at the time of wager placement.
- A player must face at least one delivery for bets to stand.

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

Four/Six Scored in Over

- Predict if there will be a boundary four/six scored in the specified over.
- Only runs scored off the bat count.
- If all six balls are not bowled due to the team being bowled out or reaching their target, wagers will stand provided one ball is bowled. However, if the over is not completed due to adverse weather conditions or the team declaring, then wagers will be void unless a winning market has already been unequivocally determined.

HOCKEY

General Rules

- ~~When a game is played at a neutral venue, the team listed on the left will be classed as the away team for settlement purposes.~~

North American College Hockey

- For regular season games, final scores will be determined by the official result of the conference.
- For all regular season or mid-season tournament games, shootouts do not count towards the final score.
- ~~Three on three overtime and/or shootout results may or may not count towards the final score.~~
- ~~In mid-season tournament games, all overtime and shootout results count towards the final score.~~

60 Minutes Spread

- Predict the result of a game after the point spread has been applied to the teams. A point spread of (+/-) 0.5 (half of one) or more goals will be given, which will be added to the actual number of goals scored.
- Wagers are settled on the events that occur in regulation time. Overtime and shootouts do not count.

SOCCER

To Reach The Final

- Predict a team to reach the final of a given tournament or cup competition.
- Cup or tournament standings will be determined by the official rules of the respective governing body.

- If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.
- If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.

To Reach The Semi Finals

- Predict a team to reach the semi finals of a given tournament or cup competition.
- Cup or tournament standings will be determined by the official rules of the respective governing body.
- If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.
- If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.

To Reach The Quarter Finals

- Predict a team to reach the quarter finals of a given tournament or cup competition.
- Cup or tournament standings will be determined by the official rules of the respective governing body.
- If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.
- If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.

To Reach The Round of 16

- Predict a team to reach the round of 16 of a given tournament or cup competition.
- Cup or tournament standings will be determined by the official rules of the respective governing body.
- If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.
- If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.

To Reach The Round of 32

- Predict a team to reach the round of 32 of a given tournament or cup competition.
- Cup or tournament standings will be determined by the official rules of the respective governing body.
- If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.

- If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.

To Reach The Knockout Stages

- Predict a team to reach the knockout stages of a given tournament or cup competition.
- Cup or tournament standings will be determined by the official rules of the respective governing body.
- If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.
- If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.

To Reach The Knockout Phase

- Predict a team to reach the knockout phase of a given tournament or cup competition.
- Cup or tournament standings will be determined by the official rules of the respective governing body.
- If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.
- If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.

~~To Reach The Specified Stage~~

- ~~• Predict a team to reach the specified stage of a given tournament or competition.~~
- ~~• Cup or tournament standings will be determined by the official rules of the respective governing body.~~
- ~~• If a team has points deducted or is disqualified by the official governing body during the course of the given tournament or cup competition, wagers placed on this market will stand.~~
- ~~• If a team starts in the tournament and does not complete all of its fixtures, wagers placed on this market will stand.~~

TENNIS

X Set Most Aces

- Predict which player will serve the most aces in the specified set.

X Set Most Double Faults

- Predict which player will serve the most double faults in the specified set.

X Set Most Breaks of Serve

- Predict which player will break their opponents serve most in the specified set.



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

FROM: Mark Vander Linden, Director, Research & Responsible Gaming

Cc: Kevin Scanlon, General Counsel

DATE: September 10, 2026

RE: National Council on Problem Gambling membership

In May of this year, the National Council on Problem Gambling (NCPG) announced a \$2 million donation from prediction market platform Kalshi to support a new initiative focused on “trader health and safety” and to establish a new “Financial Services and Trading” membership category. As a result of this announcement, the Michigan Gaming Control Board (MGCB) formally withdrew its NCPG membership. In a press release, the MGCB expressed concern that the partnership could undermine state regulatory efforts and create confusion by suggesting Kalshi operates under the same consumer protection and regulatory oversight as licensed sports betting operators. A link to the announcement is available [here](#). Similarly, the Ohio Casino Control Commission(OCCC) withdrew its membership, citing it was “incompatible with our statutory responsibilities and our commitment to safeguarding the public from gambling-related risks”. The Nevada Council on Problem Gambling has also terminated its membership, and other states have expressed concern.

In light of this, and to better understand NCPG’s relationship with the Kalshi and the financial and trading services industry, I contacted Heather Maurer, NCPG Executive Director and Cole Wogoman, NCPG Director of Policy and Partnerships. Following a conversation with them, they provided the following information.

1. What is the Financial Trader Health and Safety initiative?

NCPG has received a grant from Kalshi to support the development of national infrastructure focused on responsible trading practices and financial trader health.

NCPG Financial Trader Health and Safety Initiative



Massachusetts Gaming Commission

A coordinated national initiative to advance responsible trading and trader health within financial market environments. The buying and selling of event-based futures contracts can carry risks similar to traditional gambling, including impulsive behavior, financial harm, and the potential for escalating gambling-related issues. The NCPG Trader Health and Safety Initiative will expand education and awareness of responsible trading across financial and prediction markets, delivering practical, evidence-informed resources designed to keep pace with rapidly evolving platforms and support safer engagement.

This initiative, to be conducted over the next two years, reflects a strategic response to the rapid growth of prediction markets and similar financial products, which present behavioral risks that can mirror those seen in gambling environments. It will also provide us with infrastructure to monitor other emerging markets.

At present, there is no coordinated public health framework addressing these emerging risks. NCPG is well positioned to lead in this space by extending our expertise in prevention, education, and harm reduction.

This work builds on the NCPG Board of Directors' resolution calling on prediction market operators to promote the National Problem Gambling Helpline™ (1-800-MY-RESET) and related support resources. It is further reinforced by NCPG's public comments submitted in response to the CFTC's request for input on prediction markets.

2. Does this mean NCPG is endorsing prediction markets or Kalshi?

No. NCPG remains neutral on the legality of gambling, wagering, and prediction markets. This initiative is not an endorsement of any product or platform.

Our role is to ensure that as these markets evolve, consumer protection, risk awareness, harm mitigation, and access to care evolve alongside them.

3. How does this align with NCPG's mission?

This work is fully aligned with NCPG's mission to reduce the personal, social, and economic costs of gambling-related harm.

Key points of alignment:

- Focus on behavioral risk and harm mitigation
- Expansion of public health approaches into emerging environments
- Ensuring individuals experiencing harm—and their families—remain at the center of our work



Massachusetts Gaming Commission

4. How does this relate to NCPG's advocacy work (including CFTC engagement)?

This initiative complements our ongoing advocacy efforts, including engagement with federal regulators (the CFTC) on prediction markets.

Our focus remains consistent:

- Elevating risk awareness and consumer protections
- Ensuring harm mitigation is part of regulatory conversations

5. How will this impact NCPG's existing work?

This initiative is designed to expand, not replace, our current work.

It builds on:

- Our national infrastructure
- The Helpline and support systems
- Our education and awareness platforms

The MGC holds a "Silver"- level organizational membership with NCPG (\$ 2,500 in FY2026). According to the NCPG [website](#), there are 43 "Government Agency" members, including 30 at the same level as the MGC.

While I understand the concerns raised by the MGCB, OCCC, and others, the NCPG has a long and impactful history of promoting awareness, providing education, and advocacy to reduce gambling-related harms. As was pointed out by Ms. Maurer and Mr. Wogomon during my conversation with them, NCPG remains focused on public health and ensuring consumer protections keep pace with innovation. These priorities align with the MGC mission; therefore, I recommend that the MGC maintain its NCPG membership at this time.



Massachusetts Gaming Commission



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

From: Autumn Birarelli, Staff Attorney

Cc: Jenna Hentoff, Deputy General Counsel
Carrie Torrisi, Chief of the Sports Wagering Division
Mark Vander Linden, Director of Research and Responsible Gaming

Re: 205 CMR 255: Play Management

Date: September 10, 2026

Background

Enclosed for the Commission's consideration is the proposed draft of **205 CMR 255.00: *Play Management***. The proposed amendment is scheduled to come forward at the September 10, 2026, public meeting for initial presentation and a request for a vote of approval to start the promulgation process. This regulation amendment is authorized by G.L. c. 23N, § 4.

Discussion

The proposed amendments to 205 CMR 255.00 are intended to correct clerical errors and provide clarity. The subsection titles listed at the top of the regulation have been amended to match the titles throughout the regulation.

As currently written, 205 CMR 255.03(2) requires that if a patron has not designated themselves as subject to sports wagering limitations in accordance with 205 CMR 255, then the operator must provide a message to the user notifying them of the ability to place limits "On a monthly basis as measured from the time of enrollment onto the sports wagering platform." Tying the message requirement to the date where the patron enrolled has created an issue. If a patron enrolled with the sports wagering platform on the 31st of a month, there would not be a clear date to send the message to the patron for five months that do not have 31 days. This language is being amended to clarify that the cadence for sending the message required by this provision should be monthly or every 30 days, removing the portion regarding the user's time of enrollment.



Massachusetts Gaming Commission

205 CMR 255.03(5) describes the timing in which changes to limitations take effect. This provision uses the term “business day” as a descriptor for the timing. The term “business day” is colloquially used to refer to weekdays, but sports wagering platforms operate seven days a week. The proposed amendment would change “business day” to “day” to provide clarification.

205 CMR 255.00: PLAY MANAGEMENT

Section

255.01: Scope and Purpose

255.02: Limitations

255.03: Enrollment

255.04: ~~Notifications of Approaching Limit~~ Responsibilities of the Sports Wagering Operator

255.05: ~~Responsibilities of the Sports Wagering Operator~~ Collection of Debts

255.06: ~~Collection of Debts~~ Additional or Different Limitations

255.01 : Scope and Purpose

Sports Wagering Operators operating Sports Wagering Platforms shall maintain play management programs which allow individuals who maintain a Sports Wagering Account to designate themselves as subject to limitations regarding Sports Wagering. Sports Wagering Operators must offer, at a minimum, the limitations set forth in 205 CMR 255.02(1). 205 CMR 255.00 shall govern the procedures and protocols relative to these play management programs, which are intended to offer individuals a means to restrict gambling behavior and to increase informed player choice.

255.02 : Limitations

(1) Individuals who designate themselves as subject to limitations regarding Sports Wagering shall select one or more of the following specific activities subject to the limitations:

- (a) placing a Wager over a specified dollar amount;
- (b) placing a Wager once an individual has, during a day, week or month, Wagered a specified cumulative dollar amount; and
- (c) depositing an amount into the individual's Sports Wagering Account once the individual has, during a day, week or month, deposited a specified cumulative amount into the individual's Sports Wagering Account.

(2) If individuals choose to be subject to limitations regarding Sports Wagering, they must affirmatively designate themselves as such. No default limitations shall be imposed by Sports Wagering Operators.

(3) Individuals who designate themselves as subject to limitations regarding Sports Wagering shall not collect any winnings or recover any losses resulting from Sports Wagering in violation of the limitations.

255.03 : Enrollment

(1) When an individual seeks to enroll onto a Sports Wagering Platform, a Sports Wagering Operator shall conspicuously display to the individual a message describing the available limitations for Sports Wagering, and offering the individual the opportunity to designate themselves as subject to one or more of those limitations. In the event the individual chooses to decline that opportunity, the individual shall be required to affirmatively state that choice to the Sports Wagering Operator.

(2) Every 30 days or On a monthly basis ~~as measured from the time of enrollment onto the Sports Wagering Platform~~, if an individual has not designated themselves as subject to limitations regarding Sports Wagering, the Sports Wagering Operator shall conspicuously display a message offering individuals the opportunity to designate themselves as subject to limitations regarding Sports Wagering. In the event the individual chooses to decline that opportunity, the individual shall be required to affirmatively state that choice to the Sports Wagering Operator.

(3) Sports Wagering Operators shall maintain at all times a link prominently placed on the Sports Wagering Platform on which individuals may designate themselves as subject to limitations regarding Sports Wagering.

(4) Limitations shall become immediately effective upon designation.

255.03 : continued

(5) Individuals shall be permitted to modify or unenroll from their selected limitations regarding Sports Wagering. If individuals modify the limitations to be more restrictive, the limitations shall become immediately effective. If individuals modify the wager limitation described in 205 CMR 255.02(1)(a) to be less restrictive or unenroll from the limitation, the new limitation or unenrollment shall not take effect until the next **business** day and the individual reaffirms the modification or unenrollment. If individuals modify the limitations described in 205 CMR 255.02(1)(b) and (c) to be less restrictive or unenroll from the limitations, the new limitation or unenrollment shall not take effect until the next **business** day after the time period specified pursuant to 205 CMR 255.02(1)(b) and (c) has expired and the individual reaffirms the modification or unenrollment.

255.04 : Responsibilities of the Sports Wagering Operator

A Sports Wagering Operator shall have the same responsibilities relative to the play management program as gaming licensees and Sports Wagering Operators have relative to the administration of the voluntary self-exclusion list pursuant to 205 CMR 133.06(7)(b) and 205 CMR 233.06(4) through (8), respectively, including the obligation to submit a written policy for compliance with 205 CMR 255.00. Individuals who designate themselves to the Sports Wagering Operator as subject to limitations regarding Sports Wagering shall have the same rights as those provided under 205 CMR 133.06(7)(b).

A Sports Wagering Operator shall also have the following responsibilities relative to the administration of the play management program:

- (1) A Sports Wagering Operator shall not accept a Sports Wager over the dollar amount specified pursuant to 205 CMR 255.02(1)(a);
- (2) A Sports Wagering Operator shall not accept a Sports Wager once an individual has Wagered during the period of time specified pursuant to 205 CMR 255.02(1)(b) the cumulative dollar amount specified pursuant to 205 CMR 255.02(1)(b);
- (3) A Sports Wagering Operator shall not accept a deposit once the individual has during the period of time specified pursuant to 205 CMR 255.02(1)(c) deposited the cumulative amount specified pursuant to 205 CMR 255.02(1)(c);
- (4) A Sports Wagering Operator shall require an individual to acknowledge the following prior to being designated as subject to limitations regarding Sports Wagering:
 - (a) That the individual shall not collect any winnings or recover any losses resulting from Sports Wagering in violation of the limitation in accordance with 205 CMR 255.02(1); and
 - (b) That once the individual is designated as subject to limitations regarding Sports Wagering, an individual's attempted Sports Wager or deposit into the individual's Sports Wagering Account may be rejected or, if placed, may be voided or cancelled by the Sports Wagering Operator.
- (5) A Sports Wagering Operator shall produce monthly reports containing data and other information regarding the play management program, as specified and requested by the Commission; and
- (6) A Sports Wagering Operator shall maintain data regarding the play management program for a period of at least 24 months. A Sports Wagering Operator shall make such data available upon request to the Commission.

255.05 : Collection of Debts

Nothing in 205 CMR 255 shall be construed to prohibit a Sports Wagering Operator from seeking payment of a debt from an individual who is designated to the Sports Wagering Operator as subject to notifications or limitations regarding Sports Wagering, but who violates the terms of the limitation.

255.06 : Additional or Different Limitations

Nothing in 205 CMR 255.02 shall be construed to prevent a Sports Wagering Operator from offering additional limitations or limitations that differ, either in whole or in part, from those described in 205 CMR 255.02(1). If a Sports Wagering Operator wishes to offer a limitation not described in 205 CMR 255.02(1) or a limitation different, either in whole or in part, from the limitations described in 205 CMR 255.02(1), the Sports Wagering Operator shall submit a written request to the Sports Wagering Division describing the additional or different limitation and the reasons supporting the additional or different limitation. The Sports Wagering Operator may also include in its request a description of any requirement set forth in 205 CMR 255 from which the Sports Wagering Operator seeks relief, either in whole or in part, and the reasons supporting relief. The Sports Wagering and Responsible Gaming Divisions shall review the request, and if approved, the additional or different limitation shall be implemented and relief from the requirements of 205 CMR 255.02(1) granted, and the Sports Wagering Operator shall record and preserve data sufficient to evaluate the effectiveness of the additional or different limitation. The Commission shall retain final authority over the decision to approve or deny an Operator's request to implement an additional or different limitation pursuant to this section. Nothing in 205 CMR 255.06 shall be construed to permit an Operator to implement a less restrictive limitation from the limitations described in 205 CR 255.02(1).

REGULATORY AUTHORITY

205 CMR 255.00: M.G.L. c. 23N, § 4.



SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2, relative to the proposed amendment to **205 CMR 255.00: *Play Management***. The regulation amendment is authorized by M.G.L. c. 23N, § 4.

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

The proposed amendment to 205 CMR 255.00 applies to entities licensed by the Commission under G.L. c. 23N. Accordingly, this regulation is unlikely to have an impact on small businesses. Under G.L. c. 30A, §2, the Commission offers the following responses to the statutory questions:

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

Small businesses are unlikely to be subject to this regulation.

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

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

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

The standards set forth are design standards to encourage uniformity in compliance.

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

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

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



Massachusetts Gaming Commission

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

Massachusetts Gaming Commission
By:

Autumn Birarelli

Autumn Birarelli
Staff Attorney

Dated: September 10, 2026



Massachusetts Gaming Commission

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Legal Division

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

FROM: Jenna Hentoff, Deputy General Counsel
Judith Young, Senior Associate General Counsel
Burke Cain, Gaming Agents Division Chief
Dave DiOrio, Gaming Agents Division Assistant Chief
Luis Lozano, Casino Regulatory Manager, Encore Boston Harbor

CC: Caitlin Monahan, Director of the Investigations and Enforcement Bureau
Kevin Scanlon, General Counsel

RE: Petition for a New Game or Game Variation, *Tiger Midi and Mini Baccarat*,
pursuant to 205 CMR 147.04

DATE: September 10, 2026

Overview:

On February 11, 2026, a petition was submitted by Encore Boston Harbor (“EBH”) to the IEB to request adoption of a variation of midi and mini baccarat to the gaming floor. Specifically, EBH requested the addition of a game variation called *Tiger Baccarat* to the existing authorized Rules of Midi and Mini Baccarat. Regulations pertinent to all existing approved versions of baccarat are codified at 205 CMR 146.18. The IEB reviewed the submission in order to ensure it met the requirements of 205 CMR 147.04(3) prior to authorizing and scheduling a field trial for *Tiger Baccarat* (“Field Trial”) on the gaming floor. The Field Trial began at EBH on June 26, 2026.

The Petition:

EBH is seeking to adopt the Tiger Baccarat game variation to both midi and mini baccarat tables on its gaming floor. It is a baccarat style game in which the 5% vigorish or commission is not collected, and a winning Banker’s Hand with a point total of six (6) will be paid at lesser odds than those contained in standard baccarat, midi baccarat and mini baccarat. Additionally, the game variation features the *Tiger*, *Big Tiger*, *Small Tiger*, *Tiger Tie*, and *Tiger Pair* side wagers, which allow patrons to place optional side wagers in advance of normal game play. The side wagers each have different payout odds.



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The IEB reviewed EBH's petition as well as a summary of the game, types of wagers allowed, and draft rules and payouts offered. True odds of the game, the payout odds and the house advantages were reviewed by the IEB. The table layout and GLI testing and certification were received and verified by the IEB as well.

Field Trial:

A Field Trial began on June 26, 2026, and was scheduled to conclude on July 31, 2026. The Field Trial was extended through August to increase dealer efficacy and provide additional opportunities for payouts of the five *Tiger Baccarat* side wagers, when applicable.

Written comments were solicited for this game variation throughout the field trial; however, only one was ultimately provided. A casino patron stated their desire "to bet on the Player and Banker wager options at the same time." EBH staff reported that most players and patrons provided verbal comments requesting: the use of promotional chips; a change of the location of the *Tiger Baccarat* tables to be near the regular Baccarat section in the table games area; and that the Rules for the game be provided in Chinese.

IEB Review and Recommendation for Commission Approval:

Pursuant to 205 CMR 147.04(7), the Commission shall have the discretion to approve or deny with reasonable cause the gaming licensee's petition for a new game or game variation following a recommendation from the IEB. The IEB has reviewed the petition and materials submitted by EBH pursuant to 205 CMR 147.04(3).

The IEB observed noticeable improvement as the Field Test continued, particularly regarding dealer efficiency and payout procedures. As a result of the extended field trial and feedback from EBH staff, the IEB recommends that the Commission approve the adoption of *Tiger Baccarat* as a new game variation of midi and mini baccarat.

The Authorized Rules for both Midi and Mini Baccarat have been provided for Commission review. The IEB and Legal Division are seeking approval of *Tiger Baccarat* as a game variation and the associated updated rules which have been updated in relevant sections concerning physical layouts, wagers and payouts.



Massachusetts Gaming Commission

BACCARAT – MIDI BACCARAT

Rules

1. Definitions

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

Dragon 7-- A Banker's Hand which has a Point Count of 7 with a total of three cards dealt and the Player's Hand which has a Point Count of less than 7.

EZ Baccarat-- A variation of Midibaccarat in which vigorish is not collected.

Natural-- A hand which has a Point Count of 8 or 9 on the first two cards dealt.

Panda 8-- A Player's Hand which has a Point Count of 8 with a total of three cards dealt and the Banker's Hand which has a Point Count of less than 8.

Free Hand – A courtesy hand that is dealt without any wagers being placed on the table.

No Commission Baccarat – A variation of Midibaccarat in which no vigorish is collected on winning wagers made on the Banker's Hand.

Lucky 6 – An optional side wager that wins when the Banker's Hand has a Point Count of 6 with two or three cards.

Tiger Baccarat—A variation of Midibaccarat in which vigorish is not collected. A winning wager made on the Banker's Hand with a Point Count of 6 shall be paid 1 to 2.

2. Midibaccarat table physical characteristics

- (a) Midibaccarat shall be played on a table having numbered positions for no more than nine seated players on one side of the table and a place for the dealer on the opposite side of the table.
- (b) The layout for a Midibaccarat table shall be submitted to the IEB and approved in accordance with 205 CMR 146.18 (relating to approval of table game layouts, signage and equipment).
 - (1) An area designated for the placement of cards for the Banker's Hand and Player's Hand.
 - (2) If a licensee offers the Dragon Bonus Wager, authorized under Section 7(a)(4) (relating to wagers), separate areas designated for the placement of the Dragon Bonus Wager for each player located, from the player's perspective, immediately to the right of the areas designated for placement of wagers on the Banker's Hand and Player's Hand.
 - (3) If a licensee offers EZ Baccarat in which vigorish is not collected:
 - (i) Separate areas designated for the placement of the Dragon 7 Insurance Wager, authorized under Section 7(a)(5), for each player located, from the player's

- perspective, on the right side of the area designated for placement of a Tie Hand wager.
- (ii) Inscriptions that advise patrons that a wager on the Banker's Hand that results in a Dragon 7 shall push and be returned to the player. If the information is not inscribed on the layout, a sign containing the information shall be posted at each Midibaccarat table.
 - (iii) Separate areas designated for the placement of the Panda 8 Insurance Wager, authorized under Section 7(a)(6), for each player located, from the player's perspective, on the left side of the area designated for placement of a Tie Hand wager.
- (4) If a licensee offers No Commission Baccarat in which vigorish is not collected:
- (i) Inscriptions that advise players that a winning wager on the Banker's Hand totaling 6 shall be paid at odds of 1 to 2. If the information is not inscribed on the layout, a sign containing the information shall be posted at each Midibaccarat table.
 - (ii) Separate areas designated for placement of the Lucky 6 Wager, authorized under Section 7(a)(7), for each player located, from the player's perspective, on the left side of the area designated for placement of a Tie Hand wager.
- (5) If a licensee offers the optional Progressive Payout Wager authorized under Section 12 – Payout Odds; vigorish, a separate area designated for the placement of the Royal 9 Wager for each player.
- (6) If a licensee offers the House Money Wager, authorized under Section 7(a)(13), separate areas designated for the placement of the House Money Wager for each player.
- (7) Numbered areas that correspond to the seat numbers for the purpose of marking vigorish unless the dealer, in accordance with the option selected in the licensee's Rules Submission (relating to table games Rules Submissions), collects the vigorish from a player at the time the winning payout is made or the table is designated for play as an EZ Baccarat, No Commission Baccarat, or Tiger Baccarat table in which vigorish is not collected.
- (8) If a licensee offers Tiger Baccarat in which vigorish is not collected:
- (i) Inscriptions that advise players that a winning wager on the Banker's Hand totaling 6 shall be paid at odds of 1 to 2. If the information is not inscribed on the layout, a sign containing the information shall be posted at each Midibaccarat table.
 - (ii) Separate areas designated for placement of the Tiger wager, authorized under Section 7(a)(8), for each player located, from the player's perspective, on the left side of the area designated for placement of a Tie hand wager.
 - (iii) If the licensee offers the Big Tiger side bet under Section 7(a)(9), separate areas designated for the placement of the Big Tiger side bet for each player.
 - (iv) If the licensee offers the Small Tiger side bet under Section 7(a)(10), separate areas designated for the placement of the Small Tiger side bet for each player.
 - (v) If the licensee offers the Tiger Tie side bet under Section 7(a)(11), separate areas designated for the placement of the Tiger Tie side bet for each player.
 - (vi) If the licensee offers the Tiger Pair side bet under Section 7(a)(12), separate areas designated for the placement of the Tiger Pair side bet for each player.
- (9)

- (c) Each Midibaccarat table must have a discard bucket or rack capable of handling up to 8 decks of cards securely attached to the top of the dealer's side of the table.

3. Cards; number of decks

- (a) Midibaccarat shall be played with at least six decks of cards having backs of the same color and design and two additional cut cards. The cut cards shall be opaque and in a solid color readily distinguishable from the color of the backs and edges of the playing cards, as approved by the Commission.

4. Opening of the table for gaming

- (a) After receiving the six or more decks of cards at the table in accordance with 205 CMR 146.49, the dealer calling the game shall, as applicable, comply with the requirements of either the gaming equipment regulations and (b) through (c) below or the requirements of the gaming equipment regulations
- (b) Following the inspection of the cards by the dealer and the verification by the floorperson assigned to the table, the cards shall be spread out face upwards on the table for visual inspection by the first participant or participants to arrive at the table. The cards shall be spread out in columns by deck according to suit and in sequence. The cards in each suit shall be laid out in sequence within the suit.
- (c) After the first participant or participants is afforded an opportunity to visually inspect the cards, the cards shall be turned face downward on the table, mixed thoroughly by a "washing" or "chemmy shuffle" of the cards and stacked.
- (d) If the licensee uses pre-inspected and pre-shuffled cards, addressed under 205 CMR 146.50 on their baccarat games they must follow in accordance with their procedure submitted in the licensee's Rules Submission.
- (e) If the licensee uses a batch type shuffle machine, addressed under 205 CMR 146.51 on their baccarat games they must follow in accordance with their procedure submitted in the licensee's Rules Submission.

5. Shuffle and cut of the cards

- (a) Immediately prior to the commencement of play, unless the cards were pre-shuffled (pursuant to the gaming equipment regulations), and after each shoe of cards is completed, the gaming licensee shall require the dealer to shuffle the cards so that they are randomly intermixed. After the cards have been shuffled, the dealer shall lace approximately one deck of cards so that they are evenly dispersed into the remaining stack.
 - (1) After lacing the cards, the gaming licensee may, as an additional option, require the dealer to shuffle some or all of the cards again.
 - (2) A gaming licensee shall not initiate or terminate the use of this reshuffling option unless the gaming licensee provides its surveillance department and the Commission with at least 30 minutes prior written notice.

- (b) Any shuffling or lacing option chosen for use by a gaming licensee pursuant to (a) above shall be implemented at all tables within a pit.
- (c) After shuffling or lacing the cards and, where applicable, reshuffling them, the dealer calling the game shall perform one of the following options. The dealer will use their right hand to offer the stack of cards, with backs facing away from him to the players to be cut, or at the casino's discretion, the dealer will cut the stack of cards for the table. The dealer shall begin with the participant seated in the highest number position at the table or, in the case of reshuffle the last curator and working clockwise around the table, shall offer the stack to each participant until a participant accepts the cut. If no participant accepts the cut, the dealer shall cut the cards.
- (d) The cards shall be cut by placing the cut card in the stack at least a deck in from either end.
- (e) Prior to commencement of play, the dealer shall remove and expose the first card from the dealing shoe and place it, and an additional number of cards, drawn face down, equal to the face value of the first card drawn, in the discard rack. When determining the face value of the first card removed from the dealing shoe, a 10, jack, queen or king shall count as ten and an ace shall count as one. The licensee has the option of placing the burned cards face up for the player prior to placing them in the discard rack or bucket.
- (f) After the cards have been cut and before any cards have been dealt, a casino supervisor may require the cards to be recut if he or she determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut, at the gaming licensee's option, by the player who last cut the cards, or by the next person entitled to cut the cards, as determined by section (c) above.
- (g) When the licensee is using a manual shuffle the following steps will be incorporated into their shuffle procedure.
 - (1) The "plug" is a method for inserting unused cards from behind the cut card into the cards in the discard tray. This is usually the first step.
 - (2) The "riffle" is when the cards are divided into two piles and interlaced.
 - (3) The "turn" involves dividing the shoe into two stacks and rotating one stack 180 degrees before riffling the stacks together.
 - (4) The "strip" also known as running cuts. The strip should not occur before at least two riffles have taken place.
 - (5) The "cut" is the final step before the cards are put back into the shoe. This insures that the top card cannot be identified if it was accidentally exposed during the other steps.

6. Value of cards; Point Count of hand

- (a) The value of the cards in each deck shall be as follows:
 - (1) Any card from 2 to 9 shall have its face value.
 - (2) Any 10, jack, queen or king shall have a value of zero.
 - (3) Any ace shall have a value of one.
- (b) The Point Count of a hand shall be a single digit number from 0 to 9 and shall be determined

by totaling the value of the cards in the hand. If the total of the cards in a hand is a two-digit number, the left digit of the number shall be discarded and the right digit shall constitute the Point Count of the hand. Examples of this rule are as follows:

- (1) A hand composed of an ace, 2 and 4 has a Point Count of 7.
- (2) A hand composed of an ace, 2 and 9 has a total of 12 but a Point Count of only 2 since the left digit of the number 12 is discarded.

7. Wagers

(a) The following are permissible wagers in the game of Midibaccarat:

- (1) A wager on the Banker's Hand which shall:
 - (i) Win if the Banker's Hand has a Point Count higher than that of the Player's Hand unless EZ Baccarat is being played and the Point Counts of the Banker's Hand result in a Dragon 7.
 - (ii) Lose if the Banker's Hand has a Point Count lower than that of the Player's Hand.
 - (iii) Tie and be returned to the player if the Banker's Hand and the Player's Hand have the same Point Count or if EZ Baccarat is being played and the Point Counts of the Banker's Hand and the Player's Hand result in a Dragon 7.
- (2) A wager on the Player's Hand which shall:
 - (i) Win if the Player's Hand has a Point Count higher than that of the Banker's Hand and if EZ Baccarat is being played and the Point Counts of the Player's Hand and the Banker's Hand result in a Panda 8.
 - (ii) Lose if the Player's Hand has a Point Count lower than that of the Banker's Hand or if EZ Baccarat is being played and the Point Counts of the Banker's Hand and the Player's Hand result in a Dragon 7.
 - (iii) Tie and be returned to the player if the Point Counts of the Banker's Hand and the Player's Hand are equal.
- (3) A Tie Wager which shall:
 - (i) Win if the Point Counts of the Banker's Hand and the Player's Hand are equal.
 - (ii) Lose if Point Counts of the Banker's Hand and the Player's Hand are not equal.
- (4) If offered by a licensee, a Dragon Bonus Wager on the Player's Hand or Banker's Hand, or both, which shall:
 - (i) Win if the selected hand is:
 - a. A Natural and the other hand is not a Natural.
 - b. A Natural 9 and the other hand is a Natural 8.
 - c. Not a Natural and has a Point Count that exceeds the Point Count of the other hand by four or more points.
 - (ii) Lose if the selected hand is:
 - a. A Natural 8 and the other hand is a Natural 9.
 - b. Not a Natural and has a Point Count less than or equal to the Point Count of the other hand.
 - c. Not a Natural and has a Point Count that exceeds the Point Count of the other hand by less than four points.
 - (iii) Tie and be returned to the player if the selected hand is a Natural and the other hand is a Natural of equal Point Count.
- (5) A Dragon 7 Insurance Wager, if the table is designated for play as an EZ Baccarat table, which shall:
 - (i) Win if the Point Counts of the Banker's Hand and the Player's Hand result in

- a Dragon 7. Lose if the Point Counts of the Banker's Hand and the Player's Hand do not result in a Dragon 7.
- (6) A Panda 8 Insurance Wager, if the table is designated for play as an EZ Baccarat table, which shall:
- (i) Win if the Point Counts of the Banker's Hand and the Player 's Hand result in a Panda 8.
 - (ii) Lose if the Point Counts of the Banker's Hand and the Player 's Hand do not result in a Panda 8.
- (7) A Lucky 6 Wager, if the table is designated for play as a No Commission Baccarat table, which shall:
- (i) Win if the Point Count of the Banker's Hand wins with a 6; or
 - (ii) Lost if the Banker's Hand does not win with a 6.
- (8) A Tiger wager, if the table is designated for play as a Tiger Baccarat table, which shall:
- (i) Win if the point count of the Banker's hand wins with a 6; or
 - (ii) Lose if the Banker's hand does not win with a 6.
- (9) A Big Tiger wager if the table is designated for play as a Tiger Baccarat table, which shall:
- (i) Win if the point count of the Banker's hand wins with three cards totaling 6; or
 - (ii) Lose if the Banker's hand does not win with three cards totaling 6.
- (10) A Small Tiger wager if the table is designated for play as a Tiger Baccarat table, which shall:
- (i) Win if the point count of the Banker's hand wins with two cards totaling 6; or
 - (ii) Lose if the Banker's hand does not win with two cards totaling 6.
- (11) A Tiger Tie wager if the table is designated for play as a Tiger Baccarat table, which shall:
- (i) Win if the Banker's hand and Player's Hand tie with 6-point hands; or
 - (ii) Lose if the Banker's hand and Player's Hand do not tie with 6-point hands.
- (12) A Tiger Pair wager if the table is designated for play as a Tiger Baccarat table, which shall:
- (i) Win if either the Banker's hand or Player's Hand have a pair in their first two cards (Single Tiger Pair); or
 - (ii) Win if both the Banker's hand and Player's Hand have a pair in their first two cards (Double Tiger Pair); or
 - (iii) Win if the first two cards of the Banker's hand and Player's Hand have the same value or same face cards (Twin Tiger Pair); or
- Lose if the Banker's hand and Player's hand do not have a pair in their first two cards.
- (13) If offered by a licensee, a House Money Wager which shall:
- (i) Win if the first two cards of either the Banker's Hand or Player 's Hand, or both, are a pair. For purposes of the House Money Wager, a pair must be of same rank (two queens, for example), regardless of suit.
 - (ii) Lose if in the first two cards dealt to the Banker's Hand and the Player 's Hand, neither the Banker's hand nor the Player's hand contains a pair.
- (b) Wagers at Midibaccarat shall be made by placing value chips, plaques, or match play coupon on the appropriate areas of the Midibaccarat layout. Verbal wagers accompanied by cash may be accepted provided that the verbal wagers are confirmed by the dealer and the cash is expeditiously converted into value chips or plaques.

- (c) At the discretion of the Licensee, the player/players at the table may be allowed to omit their wagers and request a 'Free Hand' be played out.
- (d) A wager may not be made, increased or withdrawn after the dealer has announced "no more bets."

8. Hands of Banker and Player; procedure for dealing initial two cards to each hand

- (a) There shall be two hands dealt in the game of Midibaccarat, one of which shall be designated the Player's Hand and the other designated the Banker's Hand.
- (b) Prior to dealing any cards, the dealer shall announce "no more bets."
- (c) The dealer shall then deal an initial four cards from the dealing shoe. The first and third cards dealt shall be placed face down on the area designated for the Player's Hand and the second and fourth cards dealt shall be placed face down on the area designated for the Banker's Hand.
 - (1) After all four cards have been dealt, the dealer shall place the Banker's Hand underneath the right corner of the dealing shoe. The dealer shall then hand the two cards of the Player's Hand, face down, to the player with the highest wager on the Player's Hand. After viewing the Player's Hand, the player shall return the two cards, face up, to the dealer, who shall place the cards face up on the area designated for the Player's Hand and announce the Point Count of the Player's Hand.
 - (2) The dealer shall then hand the two cards of the Banker's Hand, face down, to the player with the highest wager on the Banker's Hand. After viewing the Banker's Hand, the player shall return the two cards, face up, to the dealer, who shall place the cards face up on the area designated for the Banker's Hand and announce the Point Count of the Banker's Hand.
 - (3) Prior to dealing a third card to the Banker's or Player's hand, the dealer shall settle all House Money Wagers as follows:
 - (i) If a player placed a House Money Wager, after the initial two cards of the Banker's Hand and Player's Hand have been turned face up on the layout, beginning from the dealer's right and moving counterclockwise around the table, the dealer shall collect all losing House Money wagers and pay all winning wagers in accordance with Section 12(j) (relating to payout odds; vigorish) provided that, at a player's discretion, the player may add the winning House Money payout to the player's original wager on the Banker's or Player's hand in accordance with the following:
 - a. All of the winning House Money payout or, if specified in the licensee's Rules Submission, only a specified portion of the winning House Money payout shall be added to the area designated for the placement of the player's original wager on the Banker's or Player's hand. The player's original wager and the House Money payout which was added to the player's original wager shall then be settled based on the outcome of the player's wager on the Banker's or Player's hand.
 - b. A player may not touch the winning House Money payout. The dealer shall either hand the entire winning House Money payout to the player or place all or a portion thereof, as authorized by the licensee, on the area designated for the placement of the player's wager on the Banker's or Player's hand.

- (ii) After settling the House Money Wagers, the game shall resume by dealing any third cards that are required to be dealt.
- (4) Any third card required to be dealt to the Player's Hand shall be placed face down on the area designated for the Player's Hand. The dealer shall then hand the card, face down, to the player who was handed and returned the Player's Hand. After viewing the card, the player shall return the card, face up, to the dealer, who shall place the card face up on the area designated for the Player's Hand.
- (5) Any third card required to be dealt to the Banker's Hand shall be placed face down on the area designated for the Banker's Hand. The dealer shall then hand the card, face down, to the player who was handed and returned the Banker's Hand. After viewing the card, the player shall return the card, face up, to the dealer, who shall place the card face up on the area designated for the Banker's Hand.
- (6) If two or more players wager an equally high amount on the Player's Hand, the player making the wager who is closest to the dealer, moving counterclockwise around the table, shall be handed the Player's Hand and any third card required to be dealt. If two or more players wager an equally high amount on the Banker's Hand, the player making the wager who is closest to the dealer, moving counterclockwise around the table, shall be handed the Banker's Hand and any third card required to be dealt.
- (d) The dealer or floorperson assigned to the table may require any player to relinquish the right to turn over the cards in accordance with subsection (c), above, if the player unreasonably delays the game. If the voluntary or compulsory relinquishment of that right occurs, the dealer shall offer it to the player immediately to the right of the previous player. If the player does not accept it or there is not a player in that position, the dealer shall offer it to each of the other players in turn, moving counterclockwise around the table for the remainder of that round of play. If no player accepts the cards, the dealer shall turn the cards over and place them on the designated areas of the layout.

9. Procedure for dealing a third card

- (a) After the dealer positions the cards in accordance with Section 8(c) (relating to hands of banker and player; procedure for dealing initial two cards to each hand), the dealer shall announce the Point Count of the Player's Hand and the Banker's Hand.
- (b) Following the announcement of the Point Counts of each hand, the dealer shall determine whether to deal a third card to each hand in accordance with Section 10 (relating to rules for determining whether a third card shall be dealt). Any third cards required shall be dealt as provided in Section 8(c).
- (c) In no event may more than one additional card be dealt to either hand.
- (d) If the cover card appears as the first card in the dealing shoe at the beginning of a round of play or appears during play, the cover card shall be removed and placed to the side and the hand will be completed. Upon completion of that hand, the dealer shall announce "last hand." At the completion of one more hand, the cards shall be replaced with new decks of cards.

10. Rules for determining whether a third card shall be dealt

- (a) If either the Banker's Hand or the Player's Hand is a Natural, no more cards may be dealt to either hand.
- (b) If the Point Count of the Banker's Hand and the Player's Hand is 0 to 7 on the first two cards, the Player's Hand shall:
 - (1) Draw (take a third card) if the Player's Hand has a Point Count of less than 6.
 - (2) Stay (not take a third card) if the Player's Hand has a Point Count of 6 or more.
- (c) If the Point Count of the Banker's Hand and the Player's Hand is 0 to 7 on the first two cards, the Banker's Hand shall draw or stay in accordance with the following requirements:
 - (1) If the Player's Hand does not receive a third card, the Banker's Hand shall be dealt a third card if the Point Count of the Banker's Hand is 5 or less.
 - (2) If the Player's Hand is dealt a third card and:
 - (i) The Banker's Hand has a Point Count of less than 3, the Banker's Hand shall be dealt a third card.
 - (ii) The Banker's Hand has a Point Count of 7, the Banker's Hand may not be dealt a third card.
 - (iii) The Banker's Hand has a Point Count of 3, 4, 5 or 6, the Banker's Hand shall be dealt or not dealt a third card in accordance with Table 1 as follows:

Table 1

When the Banker's first two cards total	Banker draws when Player's third card is
0, 1, 2	Banker hand always draws
3	Banker hand draws unless Player's third card is 8
4	2 – 7
5	4 – 7
6	6 – 7
7	Banker hand stands
8, 9	Natural – Neither hand draws

11. Announcement of result of round; payment and collection of wagers

- (a) After each hand has received all the cards to which it is entitled under Section 8, Section 9 and Section 10 (relating to hands of banker and player; procedure for dealing initial two cards to each hand; procedure for dealing a third card; and rules for determining whether a third card shall be dealt), the dealer shall announce the final Point Count of each hand indicating which hand has won the round. If two hands have equal Point Counts, the dealer shall announce "tie hand." If the table is designated for play as an EZ Baccarat table and the Point Counts of the Banker's Hand and the Player's Hand result in a Dragon 7 or a Panda 8, the dealer shall announce "Dragon 7" or "Panda 8." If the table is designated for play as a No Commission Baccarat table and the Point Count of the Banker's Hand results in a Lucky 6, the dealer shall announce "Lucky 6." If the table is designated for play as a Tiger Baccarat table and the Point Count of the Banker's hand results in a Tiger, the dealer shall announce "Tiger."

- (b) After the result of the round is announced, the dealer shall first collect each losing wager. After the losing wagers are collected, the dealer shall, starting at the highest numbered player position at which a winning wager is located, mark or collect the vigorish owed by that player, unless the table is designated for play as an EZ Baccarat, No Commission Baccarat, or Tiger Baccarat table in which vigorish is not collected. Immediately thereafter, the dealer shall pay that player's winning wager and then, proceeding in descending order to the next highest numbered player position at which a winning wager is located, repeat this procedure until the vigorish owed by each player is either marked or collected and each winning wager is paid.
- (c) At the conclusion of a round of play, the dealer shall remove all cards from the table and place the cards in the discard rack.

12. Payout odds; vigorish

- (a) A winning wager made on the Player's Hand shall be paid at odds of 1 to 1.
- (b) A winning Tie Wager shall be paid at odds of at least 8 to 1.
- (c) A winning wager made on the Banker's Hand shall be paid at odds of 1 to 1, except that the licensee shall extract a vigorish from the winning players in an amount equal to 5% of the amount won unless the licensee is offering EZ Baccarat in which vigorish is not collected. When collecting the vigorish, the licensee may round off the vigorish to 25¢ or the next highest multiple of 25¢.
- (d) A dealer shall collect the vigorish from a player in accordance with one of the following procedures selected by the licensee in its Rules Submission :
 - (1) At the time the winning payout is made.
 - (2) At a later time, provided that:
 - (i) The outstanding vigorish shall be collected prior to beginning play with a new dealing shoe of cards or when the player leaves the gaming table, whichever occurs first.
 - (ii) The amount of the vigorish shall be tracked by placing a coin or marker button, which contains the amount of the vigorish owed, in the rectangular space on the layout that is imprinted with the number of the player owing the vigorish.
 - (iii) The coin or marker button may not be removed from the layout until the vigorish owed is collected.
- (e) If a licensee offers the Dragon Bonus Wager, in accordance with Section 7(a)(4) (relating to wagers), a vigorish may not be extracted on a winning Dragon Bonus Wager. Winning Dragon Bonus Wagers shall be paid out at the odds in one of the following pay tables selected by the licensee in its Rules Submission filed:

Hand	Paytable A	Paytable B	Paytable C
Win by 9 points	30 to 1	20 to 1	30 to 1
Win by 8 points	10 to 1	8 to 1	10 to 1
Win by 7 points	6 to 1	7 to 1	4 to 1
Win by 6 points	4 to 1	4 to 1	4 to 1
Win by 5 points	2 to 1	3 to 1	2 to 1
Win by 4 points	1 to 1	1 to 1	2 to 1
Natural winner	1 to 1	1 to 1	1 to 1
Natural tie	Push	Push	Push

- (f) A winning Dragon 7 Insurance Wager, as described in Section 7(a)(5), shall be paid at odds of 40 to 1.
- (g) A winning Panda 8 Insurance Wager, as described in Section 7(a)(6), shall be paid at odds of 25 to 1.
- (h) If a licensee offers No Commission Baccarat, a winning wager on the Banker's Hand with a point total of 6 shall be paid at odds of 1 to 2.
- (i) A winning Lucky 6 Wager, as described in Section 7(a)(7), shall be paid as follows:
- (1) For a winning Banker's Hand containing two cards totaling 6 points, the payout is 12 to 1;
 - (2) For a winning Banker's Hand containing three cards totaling 6 points, the payout is 20 to 1.
- (j) If a licensee offers Tiger Baccarat, a winning wager on the Banker's hand with a point total of 6 shall be paid at odds of 1 to 2.
- (1) For a winning Tiger wager, as described in section 7(a)(8), shall be paid as follows:
 - (i) For a winning Banker's hand containing two cards totaling 6 points, the payout is 12 to 1.
 - (ii) For a winning Banker's hand containing three cards totaling 6 points, the payout is 20 to 1.
 - (2) For a winning Big Tiger wager containing three cards totaling 6 points, the payout is 50 to 1.
 - (3) For a winning Small Tiger wager containing two cards totaling 6 points, the payout is 22 to 1.
 - (4) For a winning Tiger Tie wager if the Player Hand and Banker hand tie with 6-point hands, the payout is 35 to 1.
 - (5) For a winning Single Tiger Pair Wager if either the Banker's hand or Player's Hand have a pair in their first two cards, the payout is 4 to 1.
 - (6) For a winning Double Tiger Pair Wager if both the Banker's hand and Player's Hand have a pair in their first two cards, the payout is 20 to 1.
 - (7) For a winning Twin Tiger Pair Wager if the first two cards of the Banker's hand and Player's Hand have the same value or same face cards, the payout is 100 to 1.

- (k) If a licensee offers the House Money Wager and the player elects to take the payout, the player shall be paid in accordance with the following pay table:

Hand	Odds
Player and Banker Pair	15 to 1
Player or Banker Pair	3 to 1

- (l) If a Licensee offers the Royal 9 Baccarat Progressive side wager for Midibaccarat games the Licensee will use either six or eight standard 52-card decks and either six or seven seats at a table. Each player chair will be assigned one unique Personal King-9 combination that can award a progressive. Personal King-9 combinations must be non-suited and unique to each player seat.

Game play begins with players placing their underlying Midibaccarat wagers and optionally the Royal 9 Baccarat Progressive wager. The wager is fixed at \$5.00. After all wagers are placed, the Banker hand and Player hand each receive two cards according to their game's procedures.

Table 1. Paytable

Hand	Pay
Personal King-9 vs. Personal King-9	Star Progressive
Banker Personal King-9	Spade Progressive
Player Personal King-9	Heart Progressive
Other Personal King-9 vs. Identical King-9	\$5,000
Suited Royal 9 vs. Suited Royal 9	\$1,500
Royal 9 vs. Royal 9	\$250
Any Suited Royal 9	\$50
Any Royal 9	\$25
All other hands	Loss

Hand Definitions	
Personal King-9 vs. Personal King-9	Player and Banker hand have exact "King-9" matching preprinted combination player is seated at
Banker Personal King-9	Banker hand matches preprinted combination player is seated at
Player Personal King-9	Player hand matches preprinted combination player is seated at
Other Personal King-9 vs. Identical King-9	Both Player and Banker hands match a "King-9" combination preprinted on any other seat
Suited Royal 9 vs. Suited Royal 9	Player hand and Banker hand both have a suited Royal 9, does not have to be same combination
Royal 9 vs. Royal 9	Player hand and Banker hand both have a Royal 9, does not have to be same combination
Any Suited Royal 9	A suited nine and any face card (J thru K) in the initial two cards dealt to Player or Banker hand

The "Personal King-9 vs. Personal King-9" combination occurs when both the Banker and Player hands have the exact "King-9" combination which matches the combination posted at the chair that the player placing the wager is seated at, while the "Banker Personal King-9" and "Player Personal King-9" combinations occur if only one of the Banker or Player hands match. The "Other Personal King-9 vs. Identical King-9" combination occurs when both the Banker and player hands match one of the "King-9" combinations posted at a chair that the player placing the wager is not seated at. The "Other Personal King-9 vs. Identical King-9" combination is awarded regardless of whether the other players are placing a Royal 9 Baccarat Progressive side wager.

"Royal 9" means a nine and any face card (Jack through King) in the initial two cards dealt to a Banker or Player hand. A "Suited Royal 9" is a "Royal 9" combination where both cards in the hand are the same suit. A "Royal 9 vs. Royal 9" hand is when the Player hand and Banker hand both have a "Royal 9" combination, not necessarily the same "Royal 9" combination. A "Suited Royal 9 vs. Suited Royal 9" hand is when the player has a "Suited Royal 9" combination and the banker also has a "Suited Royal 9" combination, not necessarily the same suit or "Royal 9" combination. "Any Royal 9" and "Any Suited Royal 9" combinations are awarded when either the Banker hand or Player hand contains the respective combination.

- (m) If Must Hit Progressive for Stax is available, the dealer hitting end-round will determine if there is a random winner from those that participated in the Royal 9 Baccarat Progressive optional side bet. This will be indicated with the light-up bet sensor at that player spot as well as being indicated to the dealer on the dealer touch interface and the double sided progressive display at the table.

13. Irregularities

- (a) Except as provided in subsection (b), below, a card drawn in error from the dealing shoe that is not disclosed shall be used as the first card of the next hand of play.
- (b) A third card dealt to the Player's Hand that is not disclosed, when a third card is not authorized under Section 10 (relating to rules for determining whether a third card shall be dealt), shall become the third card of the Banker's Hand if the Banker's Hand is required to draw under Section 10(c). If the Banker's Hand is required to stay, the card dealt in error shall become the first card of the next hand of play.
- (c) If a third card dealt to the Player's Hand, when a third card is not authorized under Section 10, is disclosed at the time it is dealt or is found face up in the dealing shoe, the dealer shall use the disclosed card as the third card of the Banker's Hand if the Banker's Hand is required to draw under Section 10(c). If the Banker's Hand is required to stay, the dealer shall, in accordance with one of the following procedures designated in the licensee's Rules Submission:
- (1) Place the disclosed card and one additional card, drawn face down from the dealing shoe,

- into the discard bucket without disclosing the additional card.
- (2) Use the disclosed card as the first card of a simulated round of play in which wagers may not be accepted. The cards shall be dealt in accordance with this chapter and placed in the discard bucket upon completion of the dealing procedures.
 - (d) Except as provided in subsection (c), above, if a card is disclosed at the time it is dealt or a card is found face up in the dealing shoe, the dealer shall use the disclosed card as the first card of a simulated round of play in which wagers may not be accepted. The cards shall be dealt in accordance with this chapter and shall be placed in the discard bucket upon completion of the dealing procedures.
 - (e) If there are insufficient cards remaining in the dealing shoe to complete a round of play, that round shall be void and all wagers shall be returned. A new round shall commence after the entire set of cards has been replaced and the new set of cards have been placed in the dealing shoe

MINIBACCARAT

Rules

1. Definitions

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

Dragon 7-- A Banker's Hand which has a Point Count of 7 with a total of three cards dealt and the Player's Hand which has a Point Count of less than 7.

EZ Baccarat-- A variation of Minibaccarat in which vigorish is not collected.

Natural-- A hand which has a Point Count of 8 or 9 on the first two cards dealt.

Panda 8-- A Player's Hand which has a Point Count of 8 with a total of three cards dealt and the Banker's Hand which has a Point Count of less than 8.

Free Hand – A courtesy hand that is dealt without any wagers being placed on the table.

No Commission Baccarat – A variation of Minibaccarat in which no vigorish is collected on winning wagers made on the Banker's Hand.

Lucky 6 – An optional side wager that wins when the Banker's Hand has a Point Count of 6 with two or three cards.

Tiger Baccarat—A variation of Midibaccarat in which vigorish is not collected. A winning wager made on the Banker's Hand with a Point Count of 6 shall be paid 1 to 2.

2. Minibaccarat table physical characteristics

- (a) Minibaccarat shall be played on a table having numbered positions for no more than nine seated players on one side of the table and a place for the dealer on the opposite side of the table.
- (b) The layout for a Minibaccarat table shall be submitted to the Massachusetts Gaming Commission and approved in accordance with 205 CMR 146.18 (relating to approval of table game layouts, signage and equipment) and contain, at a minimum:
 - (1) An area designated for the placement of cards for the Banker's Hand and Player's Hand.
 - (2) If a Licensee offers the Dragon Bonus Wager authorized under Section 7(a)(4) (relating to wagers), two separate areas designated for the placement of the Dragon Bonus Wager for each player located, from the player's perspective, immediately to the right of the areas designated for placement of wagers on the Banker's Hand and Player's Hand.

- (3) If a Licensee offers EZ Baccarat in which vigorish is not collected:
- (i) Separate areas designated for the placement of the Dragon 7 Insurance Wager, authorized under Section 7(a)(5), for each player located, from the player's perspective, on the right side of the area designated for placement of a Tie Hand wager.
 - (ii) Inscriptions that advise patrons that a wager on the Banker's Hand that results in a Dragon 7 shall push and be returned to the player. If the information is not inscribed on the layout, a sign containing the information shall be posted at each Minibaccarat table.
 - (iii) Separate areas designated for the placement of the Panda 8 Insurance Wager, authorized under Section 7(a)(6), for each player.
- (4) If a licensee offers No Commission Baccarat in which vigorish is not collected:
- (i) Inscriptions that advise players that a winning wager on the Banker's Hand totaling 6 shall be paid at odds of 1 to 2. If the information is not inscribed on the layout, a sign containing the information shall be posted at each Minibaccarat table.
 - (ii) Separate areas designated for the placement of the Lucky 6 Wager, authorized under Section 7(a)(7), for each player located, from the player's perspective, on the right side of the area designated for placement of a Tie Hand wager.
- (5) If a licensee offers Tiger Baccarat in which vigorish is not collected:
- (i) Inscriptions that advise players that a winning wager on the Banker's Hand totaling 6 shall be paid at odds of 1 to 2. If the information is not inscribed on the layout, a sign containing the information shall be posted at each Minibaccarat table.
 - (ii) Separate areas designated for placement of the Tiger wager, authorized under Section 7(a)(8), for each player located, from the player's perspective, on the left side of the area designated for placement of a Tie hand wager.
 - (iii) If the licensee offers the Big Tiger side bet under Section 7(a)(9), separate areas designated for the placement of the Big Tiger side bet for each player.
 - (iv) If the licensee offers the Small Tiger side bet under Section 7(a)(10), separate areas designated for the placement of the Small Tiger side bet for each player.
 - (v) If the licensee offers the Tiger Tie side bet under Section 7(a)(11), separate areas designated for the placement of the Tiger Tie side bet for each player.
 - (vi) If the licensee offers the Tiger Pair side bet under Section 7(a)(12), separate areas designated for the placement of the Tiger Pair side bet for each player.
- (6) If a licensee offers the optional Progressive Payout Wager authorized under Section 12 – Payout Odds; vigorish, a separate area designated for the placement of the Royal 9 Wager for each player.
- (7) If a Licensee offers the House Money Wager, authorized under Section 7(a)(13), separate areas designated for the placement of the House Money Wager for each player.
- (8) Numbered areas that correspond to the seat numbers for the purpose of marking vigorish unless the dealer, in accordance with the option selected in the Licensee's Rules Submission, collects the vigorish from a player at the time the winning payout is made or the table is designated for play as an EZ Baccarat, No Commission Baccarat or Tiger Baccarat table in which vigorish is not collected.

- (c) Each Minibaccarat table must have a discard rack capable of handling up to 8 decks of cards and securely attached to the top of the dealer's side of the table.

3. Cards; number of decks

- (a) Except as provided in subsection (b), below, Minibaccarat shall be played with six to eight decks of cards that are identical in appearance and two cover cards.
- (b) If an automated card shuffling device is utilized, Minibaccarat shall be played with 12 to 16 decks of cards in accordance with the following requirements:
 - (1) The cards shall be separated into two batches with an equal number of decks included in each batch.
 - (2) The cards in each batch must be of the same design but the backs of the cards in one batch must be of a different color than the cards in the other batch.
 - (3) One batch of cards shall be shuffled and stored in the automated card shuffling device while the other batch is being used to play the game.
 - (4) Both batches of cards shall be continuously alternated in and out of play, with each batch being used for every other dealing shoe.
 - (5) The cards from only one batch shall be placed in the discard rack at any given time.
- (c) The decks of cards opened for use at a Minibaccarat table shall be changed at least once every 24 hours.

4. Opening of the table for gaming

- (a) After receiving six or more decks of cards at the table, the dealer shall inspect the cards for any defects. The floorperson assigned to the table shall verify the inspection.
- (b) After the cards are inspected, they shall be spread out face up on the table for visual inspection by the first player to arrive at the table. The cards shall be spread in horizontal fan shaped columns by deck according to suit and in sequence.
- (c) After the first player is afforded an opportunity to visually inspect the cards, the cards shall be turned face down on the table, mixed thoroughly by a washing of the cards and stacked.
- (d) If an automated card shuffling device is utilized and two batches of cards are received at the table, all the decks in one batch of cards shall be spread for inspection on the table separate from the decks in the other batch of cards. After the first player is afforded an opportunity to visually inspect the cards, each batch of cards shall separately be turned face down on the table and stacked.
- (e) If the decks of cards received at the table are preinspected and reshuffled in accordance with 205 CMR 146.50, subsections (a)—(d), above, do not apply.

5. Shuffle and cut of the cards

- (a) Immediately prior to commencement of play, unless the cards were reshuffled in

accordance with 205 CMR 146.50 (relating to reshuffled and preinspected cards), after each dealing shoe of cards is dealt or when directed by a floorperson or above, the dealer shall shuffle the cards, either manually or by use of an automated card shuffling device, so that the cards are randomly intermixed. If the cards have been manually shuffled, the dealer shall leave the entire stack of cards intermixed but not entirely squared off (leave them feathered) so that the floorperson can verify that the shuffle did not result in any uneven distribution of cards.

- (b) After shuffling or lacing the cards and, where applicable, reshuffling them, the dealer calling the game shall perform one of the following options. The dealer will use their right hand to offer the stack of cards, with backs facing away from him to the players to be cut, or at the casino's discretion, the dealer will cut the stack of cards for the table. The dealer shall begin with the participant seated in the highest number position at the table or, in the case of reshuffle the last curator and working clockwise around the table, shall offer the stack to each participant until a participant accepts the cut. If no participant accepts the cut, the dealer shall cut the cards.
- (c) The cards shall be cut by placing the cut card in the stack at least a deck in from either end.
- (d) Once the cover card has been inserted into the stack, the dealer shall take all cards above the cover card and place them on the bottom of the stack. The dealer shall then insert the second cover card in a position at least 14 cards above the bottom of the stack. The stack of cards shall then be inserted into the dealing shoe for commencement of play.
- (e) After the cards have been cut and before the cards have been placed in the dealing shoe, a floorperson or above may require the cards to be recut if the floorperson or above determines that the cut was performed improperly or in any way that might affect the integrity or fairness of the game. If a recut is required, the cards shall be recut by the next person entitled to cut the cards, as determined by subsection (b), above. The stack of cards shall then be inserted into the dealing shoe for commencement of play.
- (f) Prior to commencement of play, the dealer shall remove and expose the first card from the dealing shoe and place it, and an additional number of cards, drawn face down, equal to the face value of the first card drawn, in the discard rack. When determining the face value of the first card removed from the dealing shoe, a 10, jack, queen or king shall count as ten and an ace shall count as one. The licensee has the option of placing the burned cards face up for the player prior to placing them in the discard rack or bucket.
- (g) If there is no gaming activity at a Minibaccarat table which is open for gaming, the cards shall be removed from the dealing shoe and the discard rack, and spread out on the table face down unless a player requests that the cards be spread face up on the table. After the first player is afforded an opportunity to visually inspect the cards:
 - (1) If there is no automated shuffling device in use, the cards shall be mixed thoroughly by a washing of the cards, stacked, then shuffled and cut in accordance with this section.
 - (2) If an automated shuffling device is in use, the cards shall be stacked and placed into the automated shuffling device to be shuffled. The batch of cards already in the shuffler shall then be removed. Unless a player requests otherwise, the batch of cards removed from the shuffler does not need to be spread for inspection and reshuffled prior to being dealt, if:

- (i) The automated card shuffling device stores a single batch of shuffled cards inside the shuffler in a secure manner.
 - (ii) The shuffled cards have been secured, released and prepared for play in accordance with procedures submitted to the IEB.
- (h) When the licensee is using a manual shuffle the following steps will be incorporated into their shuffle procedure.
 - (1) The “plug” is a method for inserting unused cards from behind the cut card into the cards in the discard tray. This is usually the first step.
 - (2) The “riffle” is when the cards are divided into two piles and interlaced.
 - (3) The “turn” involves dividing the shoe into two stacks and rotating one stack 180 degrees before riffling the stacks together.
 - (4) The “strip” also known as running cuts. The strip should not occur before at least two riffles have taken place.
 - (5) The “cut” is the final step before the cards are put back into the shoe. This insures that the top card cannot be identified if it was accidentally exposed during the other steps.

6. Value of cards; Point Count of hand

- (a) The value of the cards in each deck shall be as follows:
 - (1) Any card from 2 to 9 shall have its face value.
 - (2) Any 10, jack, queen or king shall have a value of zero.
 - (3) Any ace shall have a value of one.
- (b) The Point Count of a hand shall be a single digit number from 0 to 9 and determined by totaling the value of the cards in the hand. If the total of the cards in a hand is a two-digit number, the left digit of the number shall be discarded and the right digit shall constitute the Point Count of the hand. Examples of this rule are as follows:
 - (1) A hand composed of an ace, 2 and 4 has a Point Count of 7.
 - (2) A hand composed of an ace, 2 and 9 has a total of 12 but a Point Count of only 2 since the left digit of the number 12 is discarded.

7. Wagers

- (a) The following are permissible wagers in the game of Minibaccarat:
 - (1) A wager on the Banker's Hand which shall:
 - (i) A wager on the Banker's Hand which shall: Win if the Banker's Hand has a Point Count higher than that of the Player's Hand unless EZ Baccarat is being played and the Point Counts of the Banker's Hand result in a Dragon 7.
 - (ii) Lose if the Banker's Hand has a Point Count lower than that of the Player's Hand.
 - (iii) Tie and be returned to the player if the Banker's Hand and the Player's Hand have the same Point Count or if EZ Baccarat is being played and the Point Counts of the Banker's Hand and the Player's Hand result in a Dragon 7.
 - (2) A wager on the Player's Hand which shall:
 - (i) Win if the Player's Hand has a Point Count higher than that of the Banker's Hand and if EZ Baccarat is being played and the Point Counts of the Player's Hand and the Dealer's Hand result in a Panda 8.
 - (ii) Lose if the Player's Hand has a Point Count lower than that of the Banker's Hand or if EZ Baccarat is being played and the Point Counts of the Banker's Hand and the Player's Hand result in a Dragon 7.
 - (iii) Tie and be returned to the player if the Point Counts of the Banker's Hand and the Player's Hand are equal.
 - (3) A Tie Wager which shall:
 - (i) Win if the Point Counts of the Banker's Hand and the Player's Hand are equal.
 - (ii) Lose if Point Counts of the Banker's Hand and the Player's Hand are not equal.
 - (4) If offered by a Licensee, a Dragon Bonus Wager on the Banker's Hand or Player's Hand, or both, which shall:
 - (i) Win if the selected hand is:
 - a. A Natural and the other hand is not a Natural.
 - b. A Natural 9 and the other hand is a Natural 8.
 - c. Not a Natural and has a Point Count that exceeds the Point Count of the other hand by four or more points.
 - (ii) Lose if the selected hand is:
 - a. A Natural 8 and the other hand is a Natural 9.
 - b. Not a Natural and has a Point Count less than or equal to the Point Count of the

- other hand.
- c. Not a Natural and has a Point Count that exceeds the Point Count of the other hand by less than four points.
 - (iii) Tie and be returned to the player if the selected hand is a Natural and the other hand is a Natural of equal Point Count.
- (5) A Dragon 7 Insurance Wager, if the table is designated for play as an EZ Baccarat table, which shall:
 - (i) Win if the Banker's Hand has a Point Count of 7 with a total of three cards dealt and the Player's Hand which has a Point Count of less than 7.
 - (ii) Lose if the Point Counts of the Banker's Hand do not result in a Dragon 7.
 - (6) A Panda 8 Insurance Wager, if the table is designated for play as an EZ Baccarat table, which shall:
 - (i) Win if the Point Counts of the Player's Hand has a Point Count of 8 with a total of three cards dealt and the Banker's Hand which has a Point Count of less than 8.
 - (ii) Lose if the Point Counts of the Player's Hand do not result in a Panda 8.
 - (7) A Lucky 6 Wager, if the table is designated for play as a No Commission Baccarat table, which shall:
 - (i) Win if the Point Count of the Banker's Hand wins with a 6; or
 - (ii) Lose if the Banker's Hand does not win with a 6.
 - (8) A Tiger wager, if the table is designated for play as a Tiger Baccarat table, which shall:
 - (i) Win if the point count of the Banker's hand wins with a 6; or
 - (ii) Lose if the Banker's hand does not win with a 6.
 - (9) A Big Tiger wager if the table is designated for play as a Tiger Baccarat table, which shall:
 - (i) Win if the point count of the Banker's hand wins with three cards totaling 6; or
 - (ii) Lose if the Banker's hand does not win with three cards totaling 6.
 - (10) A Small Tiger wager if the table is designated for play as a Tiger Baccarat table, which shall:
 - (i) Win if the point count of the Banker's hand wins with two cards totaling 6; or
 - (ii) Lose if the Banker's hand does not win with two cards totaling 6.
 - (11) A Tiger Tie wager if the table is designated for play as a Tiger Baccarat table, which shall:
 - (i) Win if the Banker's hand and Player's Hand tie with 6-point hands; or
 - (ii) Lose if the Banker's hand and Player's Hand do not tie with 6-point hands.
 - (12) A Tiger Pair wager if the table is designated for play as a Tiger Baccarat table, which shall:
 - (i) Win if either the Banker's hand or Player's Hand have a pair in their first two cards (Single Tiger Pair); or
 - (ii) Win if both the Banker's hand and Player's Hand have a pair in their first two cards (Double Tiger Pair); or
 - (iii) Win if the first two cards of the Banker's hand and Player's Hand have the same value or same face cards (Twin Tiger Pair); or
 - (iv) Lose if the Banker's hand and Player's hand do not have a pair in their first two cards.
 - (13) If offered by a Licensee, a House Money Wager which shall:
 - (i) Win if the first two cards of either the Banker's Hand or Player's Hand, or both, are a pair. For purposes of the House Money Wager, a pair must be of same rank (two

- queens, for example), regardless of suit.
- (ii) Lose if in the first two cards dealt to the Banker's Hand and the Player's Hand, neither the Banker's Hand nor the Player's Hand contains a pair.
- (b) Wagers at Minibaccarat shall be made by placing value chips or plaques on the appropriate areas of the Minibaccarat layout. Verbal wagers accompanied by cash may be accepted provided that they are confirmed by the dealer and the cash is expeditiously converted into value chips or plaques.
 - (c) At the discretion of the Licensee, the player/players at the table may be allowed to omit their wagers and request a 'Free Hand' be played out.
 - (d) A wager may not be made, increased or withdrawn after the dealer has announced "no more bets."

8. Hands of Banker and Player; procedure for dealing initial two cards to each hand

- (a) There shall be two hands dealt in the game of Minibaccarat, one of which shall be designated the Player's Hand and the other designated the Banker's Hand.
- (b) Prior to dealing any cards, the dealer shall announce "no more bets."
- (c) The dealer shall then deal an initial four cards from the dealing shoe. The first and third cards dealt shall be placed face down on the area designated for the Player's Hand and the second and fourth cards dealt shall be placed face down on the area designated for the Banker's Hand.
 - (1) Prior to dealing a third card to the Banker's or Player's Hand, the dealer shall settle all House Money Wagers as follows:
 - (2) If a player placed a House Money Wager, after the initial two cards of the Banker's Hand and Player's Hand have been turned face up on the layout, beginning from the dealer's right and moving counterclockwise around the table, the dealer shall collect all losing House Money wagers and pay all winning wagers in accordance with Section 12(j) (relating to payout odds; vigorish) provided that, at a player's discretion, the player may add the winning House Money payout to the player's original wager on the Banker's or Player's Hand in accordance with the following:
 - a. All of the winning House Money payout or, if specified in the licensee's Rules Submission filed, only a specified portion of the winning House Money payout shall be added to the area designated for the placement of the player's original wager on the Player's or Banker's Hand. The player's original wager and the House Money payout which was added to the player's original wager shall then be settled based on the outcome of the player's wager on the Player's or Banker's Hand.
 - b. A player may not touch the winning House Money payout. The dealer shall either hand the entire winning House Money payout to the player or place all or a portion thereof, as authorized by the licensee, on the area designated for the placement of the player's wager on the Player's or Banker's Hand.
 - (ii) After settling the House Money Wagers, the game shall resume by dealing any third cards that are required to be dealt.

- (3) Any third card required to be dealt to the Player's Hand shall be placed face down on the area designated for the Player's Hand.
- (4) Any third card required to be dealt to the Banker's Hand shall be placed face down on the area designated for the Banker's Hand.

9. Procedure for dealing a third card

- (a) After the dealer positions the cards in accordance with Section 8(c) (relating to hands of player and banker; procedure for dealing initial two cards to each hand), the dealer shall announce the Point Count of the Banker's Hand and the Player's Hand. Following the announcement of the Point Counts of each hand, the dealer shall determine whether to deal a third card to each hand in accordance with Section 10 (relating to rules for determining whether a third card shall be dealt).
- (b) After the dealer positions the cards in accordance with Section 8(c), any third card required to be dealt shall first be dealt face up to the Player's Hand and then to the Banker's Hand.
- (c) In no event may more than one additional card be dealt to either hand.
- (d) If the cover card appears as the first card in the dealing shoe at the beginning of a round of play or appears during play, the cover card shall be removed and placed to the side and the hand will be completed. Upon completion of that hand, the dealer shall announce "last hand." At the completion of one more hand, the cards shall be reshuffled.

10. Rules for determining whether a third card shall be dealt

- (a) If either the Banker's Hand or the Player's Hand is a Natural, no more cards may be dealt to either hand.
- (b) If the Point Count of the Banker's Hand and the Player's Hand is 0 to 7 on the first two cards, the Player's Hand shall:
 - (1) Draw (take a third card) if the Player's Hand has a Point Count of less than 6.
 - (2) Stay (not take a third card) if the Player's Hand has a Point Count of 6 or more.
- (c) If the Point Count of the Banker's Hand and the Player's Hand is 0 to 7 on the first two cards, the Banker's Hand shall draw or stay in accordance with the following requirements:
 - (1) If the Player's Hand does not receive a third card, the Banker's Hand shall be dealt a third card if the Point Count of the Banker's Hand is 5 or less.
 - (2) If the Player's Hand is dealt a third card and:
 - (i) The Banker's Hand has a Point Count of less than 3, the Banker's Hand shall be dealt a third card.
 - (ii) The Banker's Hand has a Point Count of 7, the Banker's Hand may not be dealt a third card.

The Banker's Hand has a Point Count of 3, 4, 5 or 6, the Banker's Hand shall be dealt or not dealt a third card in accordance with Table 1 as follows:

Table 1

When the Banker's first two cards total	Banker draws when Player's third card is
0, 1, 2	Banker hand always draws
3	Banker hand draws unless Player's third card is 8
4	2 – 7
5	4 – 7
6	6 – 7
7	Banker hand stands
8, 9	Natural – Neither hand draws

11. Announcement of result of round; payment and collection of wagers

- (a) After each hand has received all the cards to which it is entitled under Sections 8, 9 and 10 (relating to hands of player and banker; procedure for dealing initial two cards to each hand; procedure for dealing a third card; and rules for determining whether a third card shall be dealt), the dealer shall announce the final Point Count of each hand indicating which hand has won the round. If two hands have equal Point Counts, the dealer shall announce "tie hand." If the table is designated for play as an EZ Baccarat table and the Point Counts of the Banker's Hand and the Player's Hand result in a Dragon 7 or a Panda 8, the dealer shall announce "Dragon 7" or "Panda 8." If the table is designated for play as a No Commission Baccarat table and the Point Count of the Banker's Hand results in a Lucky 6, the dealer shall announce "Lucky 6." If the table is designated for play as a Tiger Baccarat table and the Point Count of the Banker's hand results in a Tiger, the dealer shall announce "Tiger."

- (b) After the result of the round is announced, the dealer shall first collect each losing wager. After the losing wagers are collected, the dealer shall, starting at the highest numbered player position at which a winning wager is located, mark or collect the vigorish owed by that player, unless the table is designated for play as an EZ Baccarat, No Commission Baccarat, or Tiger Baccarat table in which vigorish is not collected. Immediately thereafter, the dealer shall pay that player's winning wager and then, proceeding in descending order to the next highest numbered player position at which a winning wager is located, repeat this procedure until the vigorish owed by each player is either marked or collected and each winning wager is paid.
- (c) At the conclusion of a round of play, the dealer shall remove all cards from the table and place them in the discard rack in a manner that permits the reconstruction of each hand in the event of a question or dispute.

12. Payout odds; vigorish

- (a) A winning wager made on the Player's Hand shall be paid at odds of 1 to 1.
- (b) A winning Tie Wager shall be paid at odds of at least 8 to 1.
- (c) A winning wager made on the Banker's Hand shall be paid at odds of 1 to 1, except that the Licensee shall extract a vigorish from the winning players in an amount equal to 5% of the amount won unless the Licensee is offering EZ Baccarat in which vigorish is not collected. When collecting the vigorish, the Licensee may round off the vigorish to 25¢ or the next highest multiple of 25¢.
- (d) A dealer shall collect the vigorish from a player in accordance with one of the following procedures selected by the Licensee in its Rules Submission:
 - (1) At the time the winning payout is made.
 - (2) At a later time, provided that:
 - (i) The outstanding vigorish shall be collected prior to the reshuffling of the cards in a dealing shoe or when the player leaves the gaming table, whichever occurs first
 - (ii) The amount of the vigorish shall be tracked by placing a coin or marker button, which contains the amount of the vigorish owed, in the rectangular space on the layout that is imprinted with the number of the player owing the vigorish.
 - (iii) The coin or marker button may not be removed from the layout until the vigorish owed is collected.
- (e) If a Licensee offers the Dragon Bonus Wager, in accordance Section 7(a)(4) (relating to wagers), a vigorish may not be extracted on a winning Dragon Bonus Wager. Winning Dragon Bonus Wagers shall be paid out at the odds in one of the following pay tables selected by the Licensee in its Rules Submission filed:

Hand	Paytable A	Paytable B	Paytable C
Win by 9 points	30 to 1	20 to 1	30 to 1
Win by 8 points	10 to 1	8 to 1	10 to 1
Win by 7 points	6 to 1	7 to 1	4 to 1
Win by 6 points	4 to 1	4 to 1	4 to 1
Win by 5 points	2 to 1	3 to 1	2 to 1
Win by 4 points	1 to 1	1 to 1	2 to 1
Natural winner	1 to 1	1 to 1	1 to 1
Natural tie	Push	Push	Push

- (f) A winning Dragon 7 Insurance Wager, as described in Section 7(a)(5), shall be paid at odds of 40 to 1.
- (g) A winning Panda 8 Insurance Wager, as described in Section 7(a)(6), shall be paid at odds of 25 to 1.
- (h) If a licensee offers No Commission Baccarat, a winning wager on the Banker's Hand with a point total of 6 shall be paid at odds of 1 to 2.
- (i) A winning Lucky 6 Wager, as described in Section 7(a)(7), shall be paid as follows:
- (1) For a winning Banker's Hand containing two cards totaling 6 points, the payout is 12 to 1; or
 - (2) For a winning Banker's Hand containing three cards totaling 6 points, the payout is 20 to 1.
- (j) If a licensee offers Tiger Baccarat, a winning wager on the Banker's hand with a point total of 6 shall be paid at odds of 1 to 2.
- (1) For a winning Tiger wager, as described in section 7(a)(8), shall be paid as follows:
 - (i) For a winning Banker's hand containing two cards totaling 6 points, the payout is 12 to 1.
 - (ii) For a winning Banker's hand containing three cards totaling 6 points, the payout is 20 to 1.
 - (2) For a winning Big Tiger wager containing three cards totaling 6 points, the payout is 50 to 1.
 - (3) For a winning Small Tiger wager containing two cards totaling 6 points, the payout is 22 to 1.
 - (4) For a winning Tiger Tie wager if the Player Hand and Banker hand tie with 6-point hands, the payout is 35 to 1.
 - (5) For a winning Single Tiger Pair Wager if either the Banker's hand or Player's Hand have a pair in their first two cards, the payout is 4 to 1.
 - (6) For a winning Double Tiger Pair Wager if both the Banker's hand and Player's Hand have a pair in their first two cards, the payout is 20 to 1.
 - (7) For a winning Twin Tiger Pair Wager if the first two cards of the Banker's hand and Player's Hand have the same value or same face cards, the payout is 100 to 1.

- (k) If a Licensee offers the House Money Wager and the player elects to take the payout, the player shall be paid in accordance with the following pay table:

Hand	Odds
Player and Banker Pair	15 to 1
Player or Banker Pair	3 to 1

- (l) If a Licensee offers the Royal 9 Baccarat Progressive side wager for Minibaccarat games the Licensee will use either six or eight standard 52-card decks and six seats at a table. Each player chair will be assigned one unique Personal King-9 combination that can award a progressive. Personal King-9 combinations must be non-suited and unique to each player seat.

Game play begins with players placing their underlying Minibaccarat wagers and optionally the Royal 9 Baccarat Progressive wager. The wager is fixed at \$5.00. After all wagers are placed, the Banker hand and Player hand each receive two cards according to their game's procedures.

Table 1. Paytable

Hand	Pay
Personal King-9 vs. Personal King-9	Star Progressive
Banker Personal King-9	Spade Progressive
Player Personal King-9	Heart Progressive
Other Personal King-9 vs. Identical King-9	\$5,000
Suited Royal 9 vs. Suited Royal 9	\$1,500
Royal 9 vs. Royal 9	\$250
Any Suited Royal 9	\$50
Any Royal 9	\$25
All other hands	Loss

Hand Definitions	
Personal King-9 vs. Personal King-9	Player and Banker hand have exact "King-9" matching preprinted combination player is seated at
Banker Personal King-9	Banker hand matches preprinted combination player is seated at
Player Personal King-9	Player hand matches preprinted combination player is seated at
Other Personal King-9 vs. Identical King-9	Both Player and Banker hands match a "King-9" combination preprinted on any other seat
Suited Royal 9 vs. Suited Royal 9	Player hand and Banker hand both have a suited Royal 9, does not have to be same combination
Royal 9 vs. Royal 9	Player hand and Banker hand both have a Royal 9, does not have to be same combination
Any Suited Royal 9	A suited nine and any face card (J thru K) in the initial two cards dealt to Player or Banker hand
Any Royal 9	A nine and any face card (J thru K) in the initial two cards dealt to Player or Banker hand

The "Personal King-9 vs. Personal King-9" combination occurs when both the Player and

Banker hands have the exact "King-9" combination which matches the combination posted at the chair that the player placing the wager is seated at, while the "Banker Personal King-9" and "Player Personal King-9" combinations occur if only one of the Banker or Player hands match. The "Other Personal King-9 vs. Identical King-9" combination occurs when both the Banker and Player hands match one of the "King-9" combinations posted at a chair that the player placing the wager is not seated at. The "Other Personal King-9 vs. Identical King-9" combination is awarded regardless of whether the other players are placing a Royal 9 Baccarat Progressive side wager.

"Royal 9" means a nine and any face card (Jack through King) in the initial two cards dealt to a Banker or Player hand. A "Suited Royal 9" is a "Royal 9" combination where both cards in the hand are the same suit. A "Royal 9 vs. Royal 9" hand is when the Banker hand and Player hand both have a "Royal 9" combination, not necessarily the same "Royal 9" combination. A "Suited Royal 9 vs. Suited Royal 9" hand is when the player has a "Suited Royal 9" combination and the banker also has a "Suited Royal 9" combination, not necessarily the same suit or "Royal 9" combination. "Any Royal 9" and "Any Suited Royal 9" combinations are awarded when either the Banker hand or Player hand contains the respective combination.

- (m) If Must Hit Progressive for Stax is available, the dealer hitting end-round will determine if there is a random winner from those that participated in the Royal 9 Baccarat Progressive optional side bet. This will be indicated with the light-up bet sensor at that player spot as well as being indicated to the dealer on the dealer touch interface and the double sided progressive display at the table.

13. Irregularities

- (a) Except as provided in subsection (b), below, a card drawn in error from the dealing shoe that is not disclosed shall be used as the first card of the next hand of play.
- (b) A third card dealt to the Player's Hand that is not disclosed, when a third card is not authorized under Section 10 (relating to rules for determining whether a third card shall be dealt), shall become the third card of the Banker's Hand if the Banker's Hand is required to draw under Section 10(c). If the Banker's Hand is required to stay, the card dealt in error shall become the first card of the next hand of play.
- (c) If a third card dealt to the Player's Hand, when a third card is not authorized under Section 10, is disclosed at the time it is dealt or is found face up in the dealing shoe, the dealer shall use the disclosed card as the third card of the Banker's Hand if the Banker's Hand is required to draw under Section 10(c). If the Banker's Hand is required to stay, the dealer shall, in accordance with one of the following procedures designated in the Licensee's Rules Submission:
 - (1) Place the disclosed card and one additional card, drawn face down from the dealing shoe, into the discard rack without disclosing the additional card.
 - (2) Use the disclosed card as the first card of a simulated round of play in which wagers may not be accepted. The cards shall be dealt in accordance with this chapter and placed in the discard rack upon completion of the dealing procedures.

- (d) Except as provided in subsection (c), above, if a card is disclosed at the time it is dealt or a card is found face up in the dealing shoe, the dealer shall use the disclosed card as the first card of a simulated round of play in which wagers may not be accepted. The cards shall be dealt in accordance with this chapter and placed in the discard rack upon completion of the dealing procedures.
- (e) If there are insufficient cards remaining in the dealing shoe to complete a round of play, that round shall be void and all wagers shall be returned. A new round shall commence after the entire set of cards are reshuffled and placed in the dealing shoe.

14. Continuous shuffling shoe or device

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