



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 11, 2025 | 10:00 a.m.

VIA REMOTE ACCESS: 1-646-741-5292

MEETING ID/ PARTICIPANT CODE: 112 112 3711

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 - #564

1. Call to Order – Jordan Maynard, Chair

2. Meeting Minutes

- | | |
|---------------------|-------------|
| a. January 31, 2024 | VOTE |
| b. May 21, 2024 | VOTE |
| c. August 15, 2024 | VOTE |
| d. July 22, 2025 | VOTE |
| e. August 14, 2025 | VOTE |

3. Legal – Justin Stempeck, Interim General Counsel

- | | |
|--|-------------|
| a. 205 CMR 115.04: Phase 1 and new qualifier suitability determination, standards, and procedures – Discussion and Review of Regulation Amendments and Amended Small Business Impact Statement for final adoption by Commission - Autumn Birarelli, Staff Attorney | VOTE |
|--|-------------|

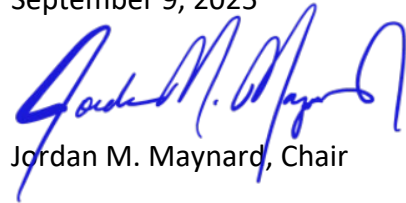


Massachusetts Gaming Commission

4. Racing – Dr. Alexandra Lightbown, Director of Racing and Chief Veterinarian
 - a. Plainridge Park Request to Reschedule the Cancelled Racing Days of June 24 and July 29, 2025 to September 26 and November 26, 2025-Steve O'Toole, Director of Racing, PPC **VOTE**
5. Sports Wagering Division – Carrie Torrissi, Division Chief, Sports Wagering
 - a. Event Catalog Update – Removal of Chinese Football Association – Tom Lam, Compliance and Operations Manager **VOTE**
6. Community Affairs Division – Joe Delaney, Division Chief of Community Affairs
 - a. Discussion regarding FY2027 Community Mitigation Fund
 - b. Boston – Modifications to 2022 and 2023 Community Mitigation Fund Grants **VOTE**
7. Commissioner Updates
8. Other Business - Reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: September 9, 2025 | 10:00 a.m. EST

September 9, 2025



Jordan M. Maynard, Chair

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



Massachusetts Gaming Commission

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Massachusetts Gaming Commission Meeting Minutes

Date/Time: January 31, 2024, 9:00 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292

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

Commissioners Present:

Chair Cathy Judd-Stein

Commissioner Eileen O'Brien

Commissioner Bradford Hill

Commissioner Nakisha Skinner

Commissioner Jordan Maynard

1. [Call to Order](#) (00:07)

Chair Judd-Stein called to order the 497th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was not conducted as all five Commissioners were present in person.

Chair Judd-Stein noted that pursuant to the Commission's Enhanced Code of Ethics, she filed a 23(b)(3) disclosure as she knew one of the candidates, Caitlin Monahan, professionally, and the role would report directly to herself as Chair.

2. [Review of Investigation and Enforcement Bureau \(IEB\) Director Selection Process](#) (1:31)

Commissioner Skinner noted that the Commission convened the Investigations and Enforcement Bureau ("IEB") Director screening committee ("Committee") and that during the past month, the Committee had been interviewing candidates for the IEB Director role. She added that the Committee did not have a predetermined number of candidates that would result from the screening process; however, they unanimously selected the candidates that would be interviewed during this meeting.

a. Interview and Consideration of IEB Director Candidates

i. [Candidate Interview: Caitlin Monahan](#) (5:18)

Chair Judd-Stein welcomed Ms. Monahan and stated she was looking forward to their conversation.

Commissioner Skinner asked Ms. Monahan why she was interested in the position, noting that she was currently a Deputy General Counsel at the Commission. Ms. Monahan stated that she was incredibly proud of the work she has done at the Commission since joining three years ago. She stated that her past experiences at a law firm taught her that she enjoyed leading teams and managing. She noted that the opportunity to lead the IEB at this organization was a compelling opportunity.

Commissioner Hill asked Ms. Monahan to elaborate on her experience working at a law firm. Ms. Monahan stated that she held an associate-level management position at the firm and that in that role, she managed 3-4 cases at a time and managed 20 associates and staff members. She added that she oversaw the day-to-day ongoing of those cases and ensured that the firm achieved great, timely, and quality results for their clients. Before holding that position, Ms. Monahan noted that she managed discovery attorneys and held a senior associate position where she guided associates in their roles. She added that while she is not currently in a managerial role with the Commission, she did take on a management role in guiding the promulgation of the sports wagering regulations.

Commissioner O'Brien asked Ms. Monahan to describe in detail the level of investigative experience that she would bring to the role. Ms. Monahan stated that while she was a litigator, she dealt with several large-scale, multi-year and multi-million-dollar litigations, typically serving as the defense counsel. She noted that her job in these cases was to figure out what happened, giving her extensive experience in discovery, collecting and reviewing documents, as well as taking depositions. She added that these experiences are directly applicable to the investigatory work that the IEB does.

Commissioner O'Brien asked Ms. Monahan to speak to the transferability of her work at the law firm during the six weeks she has been in the Acting IEB Director position. Ms. Monahan stated that she has started to see and receive reports of potential disciplinary actions in other jurisdictions and must determine whether they will be dealt with in the context of suitability or noncompliance. She noted that it is important to understand what the issue is, make sure the appropriate team has the information, and keep up with the matter to ensure everything is accounted for. She anticipates that if she were to continue in the role, she would get more involved with this aspect.

Ms. Monahan continued to discuss her management style and noted that the guiding principles of her style were communication and having strong relationships and culture. Commissioner Hill followed up by asking Ms. Monahan how she would ensure that the employees under her were completing their work. She noted that delegation is critical in this role as well as being able to trust your staff.

Commissioner Maynard asked what Ms. Monahan thought the role of the IEB was in regard to G.L. c. 23K and 23N as well as what she wanted to achieve in her first year as the IEB Director. Ms. Monahan stated that the statutes are different but both envision roles for the IEB. She added that since G.L. c. 23N was still new, they are still working to determine what the IEB's role will be, for example regarding noncompliance events. Ms. Monahan stated that her goals for the role included envisioning what the next 1-2 years will look like for investigatory work, licensing, and renewals. She also wanted to determine the IEB's staffing needs for 2025, onboard new employees effectively, and have the IEB take on a more proactive role.

Chair Judd-Stein asked Ms. Monahan to elaborate on her understanding of the governance structure of the Commission and how that will inform how she does her work. Ms. Monahan answered that her understanding was that Director of the IEB reports to the Chair, with the five Commissioners making final decisions on matters under the IEB's purview.

Chair Judd-Stein asked Ms. Monahan to further discuss how her work with the IEB will be informed by her previous work at a law firm. She stated that learning about client relations, relying on fellow staff and expertise, and having open discussions about other perspectives are all things she learned at the firm.

Commissioner Skinner asked what Ms. Monahan's approach to conflict would be. She stated that communication and listening to the opinions of others are important when dealing with conflict.

Commissioner Hill asked Ms. Monahan to discuss her experience appearing in front of a public board. She answered that in her last three years as Deputy General Counsel, it has been her job to provide information and guidance to the Commission in a public forum. Commissioner Hill followed up by asking her to elaborate on her experience with the Open Meeting Law. She stated that she has also dealt with this in her role in the past three years. She noted she is aware of the rules and limitations of this law, and she would ensure that the IEB is determining the right information for any meeting agenda.

Commissioner O'Brien asked Ms. Monahan what the biggest challenges were for the IEB. Ms. Monahan stated that the biggest challenge was licensing and onboarding new staff. She noted that her biggest challenge in the role of IEB Director would be to learn more about the day-to-day workings of the IEB and the details of the licensing system. Commissioner O'Brien also asked Ms. Monahan to quantify the types of investigations she worked on at the law firm. Ms. Monahan stated that 80-90 percent of her work was civil litigation, 10-20 percent was white collar investigations, and she did some work on pro-bono cases.

Commissioner Maynard asked Ms. Monahan about her leadership style and one leader she looked up to. Ms. Monahan stated that the former Director of the IEB Loretta Lillios was someone she looked up to and hoped to emulate. She noted that she wanted to be a steady figure that anyone would feel comfortable opening up to. Commissioner Maynard also asked how she would promote DEI in her role. Ms. Monahan stated DEI is very important to her and the Commission. She noted she wants to expand applicant pools by ensuring job postings are spread to affinity organizations to recruit new individuals. Commissioner Skinner followed up by asking how Ms. Monahan planned to mitigate any inadvertent negative impacts for people of color in her role. Ms. Monahan stated that when decisions are being made, she would ensure they are being made fairly and consistently across the board.

Chair Judd-Stein asked Ms. Monahan to describe an operational challenge that could be addressed through a technical solution to create administrative efficiency. Ms. Monahan discussed her time at the law firm and her experience with organizing large scale discovery, and her time dealing with sports wagering regulations. Chair Judd-Stein asked why Ms. Monahan thought the Legislature made the Director of the IEB report to the Chair instead of the Executive Director. Ms. Monahan stated it was likely due to the sensitive nature of the work that is done by the IEB. Chair Judd-Stein also asked Ms. Monahan if she had an administrative assistant in her past roles and what they would say about her. Ms. Monahan stated that she did have an assistant in her past role, and she hoped they would say she was kind, clear, and someone they could go to for guidance.

Commissioner Hill asked Ms. Monahan where she saw herself in 3-5 years at the Commission. Ms. Monahan stated if she were to accept the role, she would be committed to the agency. She emphasized that she appreciated the opportunity and would be honored to continue in the role of IEB Director.

Commissioner Maynard asked Ms. Monahan to give the Commission a thirty second pitch on why she should become the IEB Director. Ms. Monahan stated that she has knowledge of the role and relationships with individuals across the Commission and has an interest in taking on the challenge of the role.

Chair Judd-Stein thanked Ms. Monahan for applying and interviewing for the role.

ii. [Candidate Interview: Robert Charette](#) (1:55:33)

The Commission reconvened after a short break. All five Commissioners were present.

Chair Judd-Stein introduced Robert Charette and stated thanked him for applying for the position.

Commissioner Skinner asked Mr. Charette to explain his understanding of the role of IEB Director and why he was interested. Mr. Charette stated that the IEB Director oversees the vendors, employees, and conducts background investigations on individuals who work for or participate with the Commission. He added that much of his past experiences have been compliance and audit based. Commissioner Skinner how Mr. Charette saw his criminal investigatory experience transferring to the role. He stated that the skills he learned as an investigator would absolutely be transferable in terms of dealing with background checks or vendors.

Commissioner Hill asked Mr. Charette to explain his managerial style. Mr. Charette stated he has always been a people person. He noted important qualities that managers should have, such as integrity, honesty, empathy, compassion and effective communication. He added that not every manager can have one type of managerial style and that it varies based on the situation at hand. Commissioner Hill followed up by asking Mr. Charette to elaborate on how he would be day-to-day in the role. Mr. Charette stated he would absolutely delegate to his team and that in his current role, he manages roughly 55 staff members.

Commissioner O'Brien asked Mr. Charette what his investigation experience was and what types of investigations he had worked on. Mr. Charette stated he has worked on missing child cases, gun cases, and fugitive investigations, noting that in the past year, his agency arrested over 70,000 fugitives. Commissioner O'Brien asked Mr. Charette to elaborate on what his work entailed regarding the fugitive cases. He discussed a past case he had worked on and noted that he had extensive knowledge in utilizing every tool possible to achieve a certain result. Mr. Charette emphasized the importance of background checks for the Commission and how his skill set would help him in that area.

Chair Judd-Stein asked Mr. Charette what the first steps were that he would take in the role to familiarize himself with the Commission and the IEB. He stated that he would look, listen, and learn if he were to become the IEB Director. He discussed personal experiences with challenges he has faced and how he navigated them.

Commissioner Maynard asked Mr. Charette how he would decide on what would go into a report and what would be kept out. Mr. Charette stated all pertinent information would go into a report, noting that he would collect the facts, present them, and be transparent. Commissioner Maynard asked Mr. Charette what type of leader he was. Mr. Charette stated that as a leader, he wanted individuals to respect him. He emphasized he wants his staff to know he is sincere and cares about them.

Chair Judd-Stein asked Mr. Charette if he had the chance to familiarize himself with the structure of the Commission and how he would resolve disagreements. Mr. Charette stated that he understood the structure of the Commission and elaborated on his past experiences of dealing with disagreements. He mentioned he would refer to those with more experience and would advocate for his perspective while listening to others in a professional manner.

Chair Judd-Stein asked Mr. Charette how he navigated learning the differences in laws and policies when he shifted his career from New York to Rhode Island and how he would apply that experience in Massachusetts. Mr. Charette noted that state level dynamics are the most difficult to learn. To navigate this, he stated he would ask questions and learn from fellow staff.

Commissioner Skinner asked how Mr. Charette would approach and understand the work done by the Commission and IEB. He stated he would ask plenty of questions and do research. He noted that he would collaborate and rely on the legal counsel.

Commissioner Hill asked where Mr. Charette saw himself after five years with the Commission. Mr. Charette stated that he always wanted to work and collaborate with others. He emphasized he would be with the Commission for the long haul.

Commissioner O'Brien asked Mr. Charette to clarify if he was a member of the union in Rhode Island. He clarified he was not a union member but was a member of a group called the Detention Enforcement Officers, which is a part of the Union. Commissioner O'Brien also asked about Mr. Charette's experience testifying in court. He stated he does have experience in that regard and discussed different cases in which he has testified.

Commissioner Maynard asked Mr. Charette how many people reported to him in his current role. Mr. Charette stated that he had 55 employees who reported to him. Commissioner Maynard also asked how Mr. Charette would promote DEI in this role. Mr. Charette discussed personal experiences with DEI and its importance to him.

Chair Judd-Stein asked Mr. Charette if he had an administrative assistant in his past roles and what they would say about him. Mr. Charette stated he did have an administrative assistant, and he encouraged the Commission to speak to the people he worked with to get a better understanding of his leadership style.

Mr. Charrette asked the Commission if they could explain a day in the life of the IEB Director. Commissioner Hill noted that every day is different. Chair Judd-Stein stated that the IEB Director has important relationships within, as well as outside of, the Commission.

Mr. Charrette finished by stating that this position would integrate all his past experiences along with his passion for gaming. He noted he would become a director that the Commission would be proud of.

b. [Discussion and Selection of IEB Director](#) (3:15:49)

The Commission reconvened after a short break. All five Commissioners were present.

Commissioner O'Brien stated both candidates did an exemplary job answering the Commissioners' questions and have excellent skill sets. She did note that their skill sets were different, and neither of them had the skill sets the IEB Director has historically had in the position. She noted that Mr. Charette's background may not be as transferable and that he did not present case strategies in the way she had hoped. She stated that Ms. Monahan does not have the length of experience or level of management that Mr. Charette has. She continued by stating that she was leaning towards hiring Ms. Monahan as it would provide a more seamless transition for the IEB.

Commissioner Skinner agreed with Commissioner O'Brien's sentiment. She stated that some of the aspects of the job may be challenging for Mr. Charette, specifically the legal nuances of the role. She noted that Ms. Monahan would be able to step into the role more effectively.

Commissioner Hill stated he appreciated Mr. Charette's management style, experience, and passion for DEI. However, he added that Mr. Charette does not have experience in licensing and suitability investigations. Commissioner Hill noted that Ms. Monahan had the needed knowledge of the agency and the laws and regulations and had built relationships within the Commission.

Commissioner Maynard stated that Mr. Charette was strong in management and appreciated his vulnerability during his interview. He noted that Ms. Monahan has taken on complex tasks and navigated different personalities within the Commission. Commissioner Maynard added that both candidates could grow in the role but that Ms. Monahan understands the Commission and he was leaning towards her.

Chair Judd-Stein echoed the Commissioners' statements, noting that both candidates were strong in their own ways. She stated that Ms. Monahan has advised the Commission on legal and regulatory issues. She stated that she appreciated Mr. Charette's empathy, compassion, and humility. Chair Judd-Stein stated that either candidate would be successful in the role; however, she would be comfortable entrusting Ms. Monahan with the role.

Commissioner Hill moved that the Commission offer Caitlin Monahan the job of Director of the Investigations and Enforcement Bureau, subject to any and all background and reference checks. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

3. [Next Steps: Terms of Offer for IEB Director](#) (3:43:22)

a. Executive Session

Chair Judd-Stein stated that the Commission anticipates that it may meet in executive session in accordance with G.L. c. 30A, § 21(a)(2) to conduct strategy sessions in preparation for negotiations with the selected IEB Director Candidate, Caitlin Monahan, pursuant to Item 2 above, the IEB Director being nonunion personnel of the Commission. She further stated that the public session of the Commission meeting would not reconvene at the conclusion of the executive session.

Commissioner Skinner moved that the Commission enter an executive session for the reasons Chair Judd-Stein stated. Commissioner Maynard seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

Transcriber's Note: The Commission entered executive session, and the public session of the Commission meeting did not reconvene at the conclusion of the executive session.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated January 31, 2024.

Massachusetts Gaming Commission

Meeting Minutes



Date/Time: May 21, 2024, 11:00 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292

PARTICIPANT CODE: 112 825 4566

The Commission conducted this public meeting remotely utilizing collaboration technology. The 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:

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

1. Call to Order (0:04)

Interim Chair Jordan Maynard called to order the 517th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all four commissioners were present for the meeting.

2. Sports Wagering Operator Wager Limitations Roundtable (0:44)

a. Opening remarks and introduction of roundtable participants (0:56)

Interim Chair Jordan Maynard stated that the roundtable would primarily focus on how, when and why a patron would be limited by a Sports Wagering Operator in the Commonwealth. He noted that the Commission was made aware of reports from consumers and various media articles that some operators limit patrons who routinely win. He stated that some sports wagering operators claimed they were not in violation of house rules, State laws, or other authorized acts when the patrons were limited. He noted that operators have the right to limit their risk by blocking players attempting to circumvent the rules. He stated that many at the Commission considered the implication that patrons wagering honestly were being limited and how that limitation would incentivize those players to turn to the illegal market.

Interim Chair Maynard stated that ten operators decided against participating in the roundtable and preferred to discuss the topic in an executive session due to the sensitivity of the information. He highlighted the importance of public meetings and clarified that the team at the Commission developed questions to guide, but not limit, discussion.

General Counsel Todd Grossman stated that there was no provision of the law governing executive sessions or of the Public Records Law that covers the circumstances of this matter.

Interim Chair Maynard added that Justin Black would be representing Bally's Interactive ("Bally's") in the meeting.

Commissioner Skinner asked for clarification about the roles of the participants in the roundtable. Interim Chair Maynard stated that Co-Founder of Unabated Sports Jack Andrews was in attendance as well as CEO and Founder of Doura-Schawohl Consulting LLC Brianne Doura-Schawohl, gaming industry consultant at Closing Line Consulting Dustin Gouker, and Director of Research and Responsible Gaming Mark Vander Linden.

b. Review of previous discussions related to wager limitations and comments received by the MGC (10:04)

Sports Wagering Director Bruce Band stated that over the course of several months, he, Sports Wagering Operations Manager Andrew Steffen and Sports Wagering Business Manager Crystal Beauchemin had discussions with the licensees on the topic of wager limitations. He asked Operations Manager Steffen to explain those conversations.

Operations Manager Steffen provided an overview of recent activities by the Sports Wagering Division. He explained that the roundtable was in response to a public comment submitted to the Commission about the business practice of limiting sports wagers where a patron is not permitted to bet beyond a set amount for an event or sport. He stated that the matter had been under review for several months as the Sports Wagering Division expanded its team. He explained that in January, the team conducted research and met with three operators to gain insight into the topic. He noted that on March 28, 2024, the Sports Wagering Division presented its findings in a public meeting.

c. Topics of Discussion

i. Please detail how and why a patron may be limited on your platform, including how you may limit patrons on an individual basis (13:28)

Mr. Black stated that sports books offer a broad range of wagering opportunities. He added that Bally's does not limit players based on winnings but rather based on underlying factors specific to Bally's from a risk management perspective.

Mr. Andrews, who is also a professional gambler, stated that Bally's utilizes a third-party provider, Kambi Group Plc ("Kambi"), to operate their risk management program. He added that

Kambi has a history of identifying players based on their closing line value and expected value and uses stake factoring to determine for Bally's which players have been limited down.

Mr. Black stated that he could not speak on behalf of Kambi and emphasized that sports wagering odds were subject to a large number of variables. Therefore, sports books operate under the assumption that patrons will try to create an edge out of imperfect odds.

Commissioner O'Brien asked if there was a history of brick and mortar casinos imposing wager limitations as opposed to sports betting.

Director Band stated that brick and mortar operators limit "advantage players" as well as every table which will have a minimum and maximum bet requirement. He explained that advantage players such as "card counters" are not considered illegal in this jurisdiction.

Interim Chair Maynard asked Director Band to explain the communication process that occurs when a player is banned at a casino table. Director Band stated that a player cannot be banned at a table in this jurisdiction, but the amount that a patron can wager will be limited. He stated that casinos typically limit a patron to \$200,000 per hand.

Operations Manager Steffen noted that the number of hands that an advantage player may play can be limited or the deck of cards may be split in half.

Commissioner Skinner stated that her understanding was that initially, the issues and concerns brought to the Commission were limited to situations involving "sharps". She noted that additional comments received indicated that regular individuals and recreational patrons were being limited simply for winning. She added that in her opinion, this affects many more individuals than the handful of sharps that may be gaming the system from the operator perspective. She expressed that according to the memo prepared by the Sports Wagering Division, *contained in the Commissioners' Packet on pages 3 – 6*, it was within the Commission's regulations for an operator to limit patrons; however, the Commission was lacking information on the determination process on the part of the operator. She stated that the Commission was unlikely to get an answer today due to a lack of participation from sports wagering operators. She stated that there were complaints around a lack of communication from the operators, and she was concerned that individuals can bet large amounts and are limited when they start to win but were not given a reason why. She stated that she wanted to understand why this was occurring and what the operators' rationale is.

ii. Please explain the experience of a patron once they become limited (27:20)

Interim Chair Maynard agreed with Commissioner Skinner's sentiment and asked Mr. Gouker to describe the experience of a patron once they become limited.

Mr. Gouker stated that operators have a lot of data on this topic, and an important starting point was to understand what percentage of Massachusetts patrons were limited for winning opportunities because of violations of house rules or for responsible gaming reasons. He stated that this transparency is key.

Ms. Doura-Schawohl echoed Mr. Gouker's point that more data must be collected. She stated that there was a test case in Washington D.C. in which a patron was limited for problem or responsible gaming reasons without true justification.

Commissioner O'Brien asked if there were relevant regulations, statutes, or practices in the market that the Commission should be aware of. Ms. Doura-Schawohl responded that there are minimum bet standards in Australia because of concerns of patrons being limited. She explained that the UK has more robust programs to track problematic play. Further, New Jersey has a model which has distinctive obligations for a licensee that when certain thresholds of play are met, the player is required to talk to someone.

Interim Chair Maynard asked Mr. Andrews to describe the experience of a patron that becomes limited. Mr. Andrews stated that often patrons are not notified of the limitation and will make multiple attempts to understand what their limit is when betting. There are no listed minimum and maximum bets for online sports betting.

Commissioner Skinner asked for someone to speak to the concept of new player account limitations and how a limit is determined by an operator. Mr. Black responded that every new player who signs up on Bally's platform is treated the same and is not capped based on their first winnings. Commissioner Skinner asked Mr. Black to clarify that he did not believe that there was individual limit setting upon account creation. Mr. Black stated that she was correct.

iii. What are the responsible gaming implications if patron limits are more heavily regulated? (42:27)

Interim Chair Maynard asked about the implications of regulating patron limits. Ms. Doura-Schawohl responded by stating that stake limits are different from looking at aggregate data. She added that competing studies suggest that 1% of an individual's total income would be a "safe-zone" for gambling expenditures while another study suggests that it should be 3% of discretionary income. She stated that sports books have billions of data points at their disposal, and she proposed analyzing aggregate data to understand the risk that someone faces when gambling. She noted a Connecticut study which found that 71% of revenue was arrived at by 7% of the population, 1.8% of those individuals having a gambling problem or gambling diagnosis and 4.9% being at-risk. She stated that it would be worth exploring using data to mitigate gambling related harms.

Commissioner O'Brien asked if there are any regulations that tie the maximum bet to the minimum. Ms. Doura-Schawohl responded by stating that Australia has fixed odds betting and that she would provide that information.

Director Vander Linden stated the Commission endorsed lower risk gambling guidelines, both behavioral and financial, by recommending that no more than 1% of an individual's monthly income is used. He added that looking at aggregate data is essential. He stated that the Commission was interested in this and was pursuing how data can be used to protect players.

Mr. Gouker reiterated these points. Interim Chair Maynard stated that Director Vander Linden was creating an AI task force to address these issues.

iv. What would be the impacts to the industry if allowing limits on individual patrons was prohibited or limited by law or regulation? (53:14)

Mr. Black stated that if limiting was no longer possible, there are other strategies that will impact the offerings available to people in Massachusetts, such as product restrictions.

v. What are other jurisdictions and/or other sportsbooks doing? (54:51)

Interim Chair Maynard asked if there was any other jurisdiction which imposes a stricter limit or regulation than Massachusetts. Operations Manager Steffan responded that Massachusetts regulations are very similar to other jurisdictions that they were compared against.

Commissioner Skinner asked if there was a sportsbook that does not limit patrons. Mr. Andrews stated there are sportsbooks that do not limit patrons. These sportsbooks take a low margin approach to the industry and offer a fair playing field to all bettors; however, Massachusetts has a high barrier to entry for incoming operators.

Mr. Gouker agreed with Mr. Andrews and stated that a legislative change would fix this problem but that it may not be the best course of action.

Ms. Doura-Schawohl stated that a lower barrier to entry may not provide a solution to ultimately fix the issue of patrons complaining about being limited with little to no communication and leaving patrons who need to be limited not being offered that option.

Interim Chair Maynard stated that he was trying to understand how communication to patrons works and how specific this communication was.

Mr. Gouker agreed that lowering the barrier to entry would have policy ramifications and raised the possibility of creating a secondary licensing option. He emphasized the need for transparent communications to limited patrons, including what an individual is limited on, how they are limited, and why.

Mr. Andrews stated that patrons are not being informed about the reason they have become limited. He stated that operators deny that they limit players based on winnings and suggested that operators limit patrons on certain sports that they consistently win.

Interim Chair Maynard stated that Massachusetts consumers are treated very well, and the Commission deals with consumer issues every day.

Ms. Doura-Schawohl stated that there is interest about these types of communications from operators to patrons in many jurisdictions and at many levels of government.

Mr. Andrews commented that many players feel that games are fundamentally unfair and limiting is a part of that. He commended the Commission for holding a roundtable on the subject.

Mr. Gouker stated that the Massachusetts Attorney General's Office has taken action against fantasy parlay sites which offer parlays against the house. He explained that limiting also occurs in the unregulated market.

Commissioner O'Brien stated that the Commission must be proactive in terms of taking action to address player limiting and take into consideration responsible gaming and marketing matters. She withheld further comment but requested that this topic be addressed in future meetings.

Commissioner Skinner stated that the discussion was not as meaningful as she had hoped due to the lack of participation from operators. She added that she did not think that the meeting had scratched the surface of the issue. She agreed that the data was a good starting point.

Commissioner Hill shared in Commissioner Skinner's frustration that there was information that the Commission did not get today.

Interim Chair Maynard stated that the Commission strived to strike a proper balance for regulation. He added that he hoped that the Commission continued to learn about this subject.

3. [Other Business](#) (1:22:09)

Hearing no other business, Interim Chair Maynard requested a motion to adjourn. Commissioner Hill moved to adjourn. The motion was seconded by Commissioner O'Brien.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated May 17, 2024](#)
2. [Commissioner's Packet from the May 21, 2024](#), meeting (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: August 15, 2024, 10:00 a.m.
Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 444 4823

The Commission conducted this public meeting remotely utilizing collaboration technology. The 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:

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

1. [Call to Order](#) (00:04)

Interim Chair Maynard called to order the 528th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all four Commissioners were present for the meeting.

Interim Chair Maynard and the Commissioners thanked David Souza for his time with the Commission upon his departure.

2. [Meeting Minutes](#) (03:54)

Commissioner Skinner moved that the Commission approve the minutes from the September 7, 2023 and September 18, 2023 public meetings as included in the Commissioners' Packet, subject to any necessary corrections for typographical errors, or any other non-material matters. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.
Interim Chair Maynard: Aye.
The motion passed unanimously, 4-0.

3. [Administrative Update](#) (05:06)

a. [Wager Limitation by Operator Follow Up](#) (05:22)

Executive Director Dean Serpa noted that the Commission spoke about wager limitations in the sports wagering space during the August 1, 2024 public meeting and reached a consensus to hold a second discussion on the topic during a public meeting. Executive Director Serpa asked to set a date for that second discussion and to finalize the format of the conversation.

Commissioner Hill asked for a date no later than October and for the discussion to be a standalone meeting. Commissioner O'Brien agreed and noted that there could be statistics that need to be prepared for the meeting. Commissioner Skinner also agreed and noted that having questions prescribed for the operators in advance would be reasonable. Interim Chair Maynard agreed that prescribed questions were a good start and that the Commissioners reserved the right to ask further questions. Interim Chair Maynard established an expectation that every operator would engage with the Commission.

b. [FY24 Year End Financial Gaming Obligations](#) (11:11)

Investigation and Enforcement Bureau ("IEB") Gaming Agents Division Chief Burke Cain provided a brief casino update on events and promotions held by Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGM Springfield"), Wynn MA, LLC d/b/a Encore Boston Harbor ("Encore"), and Plainville Gaming and Redevelopment, LLC d/b/a Plainridge Park Casino ("PPC"). Chief Cain covered the financial gaming obligations for the three casinos, *found on pages 25-26 of the Commissioners' Packet*.

Interim Chair Maynard thanked Chief Cain. Commissioner O'Brien congratulated PPC for having had no underage financial forfeitures. Chief Cain showed appreciation for the gaming agents who worked at each of the locations.

4. [Legislative Update](#) (19:03)

Commissioner Hill provided a legislative update on the HERO Act and noted that it did not include language that would have allowed slot machines in veteran organizations as part of the final bill.

5. [Community Affairs Division](#) (20:05)

a. [Plainridge Park Casino Quarterly Report](#) (20:46)

General Manager North Grounsell presented the quarterly report for PPC, with topics including revenue and taxes, lottery sales, state and local spend, vendor diversity, compliance, review of

employment, and community development. *The quarterly report for PPC was found on pages 27-41 of the Commissioners' Packet.*

Commissioner Skinner asked what PPC's role was with the Diner en Blanc Boston event. Mr. Grounsell said that PPC acted in a supporting capacity for the event. Commissioner Hill also commented on his own attendance to one of the events named in the presentation. Interim Chair Maynard applauded PPC for their accomplishments.

b. [MGM Springfield Quarterly Report](#) (30:13)

Vice President and Legal Counsel Gus Kim, Vice President of Finance Arlen Carballo, Director of Compliance Daniel Miller, and Director of Public Affairs Beth Ward presented the quarterly report for MGM Springfield with topics including revenue and taxes, lottery sales, diversity and local spend, diversity procurement efforts, compliance, employment, community outreach and entertainment. *The quarterly report for MGM Springfield was found on pages 42-69 of the Commissioners' Packet.*

Commissioner O'Brien thanked the presenters for breaking down their underage compliance statistics but asked how the minors were getting through. Mr. Miller stated that underage individuals were primarily getting through unmanned locations. Commissioner O'Brien asked if MGM was exploring options for closing off those locations. Mr. Miller confirmed their attempts to close those entrance points to minors.

Interim Chair Maynard showed his appreciation for one of the staff members at MGM who was working on preventing underage individuals from entering the floor of the casino. Commissioner Skinner expressed her gratitude for the community engagement presentation. Mr. Kim thanked the Commissioners for their efforts.

c. [Encore Boston Harbor Quarterly Report](#) (51:40)

Senior Vice President and General Counsel Jacqui Krum, Executive Director of the Legal Department Juliana Catanzariti, Executive Director of Security and Investigations Tom Coffey, Vice President and General Counsel of WSI US, LLC d/b/a WynnBet Jennifer Roberts presented the quarterly report for Encore with topics including revenue and taxes, lottery sales, workforce, operating spend: diversity and local, compliance, human resources initiatives, promotions, and a WynnBet wind-down timeline. *The quarterly report for Encore was found on pages 70-101 of the Commissioners' Packet.*

Commissioner Skinner asked what action was taken by Encore against the parent whose minor child was intercepted consuming alcohol. Mr. Coffey stated that if the parent facilitated the entrance of the minor onto the floor, then they were both treated as trespassers. Interim Chair Maynard asked the ages of the minors. Mr. Coffey replied by stating that they were 17 years old. Commissioner O'Brien asked about the instance with longest time period of the minor having been on the floor. Mr. Coffey replied that it was the situation where a minor was with their parents on the floor.

Commissioner Skinner thanked Ms. Roberts for her presentation on WynnBet's wind-down operations. Commissioner Skinner stated that she had further questions on some outstanding items that she would follow up with them on. Interim Chair Maynard applauded the Encore team for their efforts to represent the community.

Transcriber's notes: The Commission went on a break at [1:08:44](#) and returned at [1:15:38](#).

d. [FY26 Community Mitigation Fund Policy Questions](#) (1:15:43)

Interim Chair Maynard announced the return of the Commission from break. Roll call attendance was conducted, and all four Commissioners were present for the meeting.

Commissioner Skinner clarified that her previous comment regarding further questions to Ms. Roberts was misdirected and should have been directed to Ms. Krum.

Chief of the Community Affairs Division Joe Delaney described the FY 2026 Community Mitigation Fund Policy process and presented questions for the Commission's review and consideration. *The questions and related information were included in the Commissioners' Packet on pages 102-104.*

Commissioner Hill responded to question 1 regarding the amount of money to be allocated for FY26 by saying that the Commission needed to proceed as before, allocating the same amount of funding to the community. Commissioner O'Brien agreed with Commissioner Hill. Commissioner Skinner also agreed and stated the increased need to communicate with the communities that the funds were a one-time allocation for the grant year. Interim Chair Maynard stated that the grant applications needed to be the guide for money allocation.

Commissioner Skinner asked for further understanding on how the licensees or operators would feel about the proposed funds transfer from Region A to Region B as outlined in question 2. She said that she found value in the licensees' input and wanted to make fully informed decisions. Commissioner O'Brien and Commissioner Hill both agreed with the recommendation for the funds transfer provided by Chief Delaney. Interim Chair Maynard stated his understanding of the situation and agreed with the recommendation. Commissioner Skinner clarified that she did not disagree with the but said that to fully understand the impact of their decisions, she wanted to hear from the licensees. Chief Delaney stated that he would reach out to the licensees.

All of the Commissioners stated their full agreement with the recommendations provided by Chief Delaney in response to question 3 to not make any changes to grant eligibility.

In response to question 4 on whether the Commission should make any changes to the distribution formula, Interim Chair Maynard asked if there was a community in Region A that wanted to get reclassified and asked if the Commission looked into it. Chief Delaney stated that it was Revere, which was not designated as a surrounding community, meaning they did not receive additional community mitigation funds. Chief Delaney clarified that Revere did not petition to be a surrounding community at the designated time, thus Revere did not receive the additional funding based on the formula. Interim Chair Maynard said that he preferred to know if the Commission was able to allocate the additional funds to Revere. Chief Delaney stated that he

would look into it further along with the Legal Division. He further noted that if the money could be allocated to Revere, the funding allocations in Region A would have to be rejiggered. Commissioner Skinner asked for a separate discussion dedicated to this issue. The Commissioners and Chief Delaney continued to discuss the issue and chose to delegate it to the Commission's Legal Division for further information.

Commissioner O'Brien asked Chief Delaney, responding to question 5 regarding whether the Commission should change the length of the grant term or not allow extensions of current grants, if the funds were restricted and protected, which Chief Delaney confirmed. The Commissioners agreed with the recommendation provided by Chief Delaney to reduce the grant term to two years.

For question 6 on whether the Commission should be more prescriptive on the required backup documentation, Commissioner Skinner agreed with the recommendation to develop additional guidance and added that the Commission needed to hold the applicants to a different standard when it came to the supporting documentation for funding applications. Chief Delaney agreed with the need for more clarity. Interim Chair Maynard also agreed that the integrity of the program had to be protected.

All of the Commissioners agreed with the recommendations provided by Chief Delaney for question 7 that the Commission should not make any changes to the identified project impacts.

For question 8 on whether the lease assistance that has been provided to the Hampden County Sheriff's Department should be limited, Interim Chair Maynard stated that he did not want to pre-judge an application. Commissioner O'Brien agreed with Interim Chair Maynard. Commissioner Hill agreed with the other Commissioners but asked if the Commission had any responsibility to notify consistent fund recipients if their application was going to be denied. After a brief discussion of the issue, the Commissioners agreed that the Commission should not pre-judge applications despite prior approvals and budgeting concerns.

For question 9 regarding a vehicle purchase policy, Commissioner O'Brien stated that the Commission already had a broad policy dealing with vehicles. Chief Delaney questioned the full extent of the application of the funding for the vehicle requests in relation to casino impact and agreed to provide more guidelines.

Interim Chair Maynard encouraged grant recipients to acknowledge that the grants were allocated by the Commission. He clarified that it would not be a condition on the grant but an offer to promote awareness of the work of the Commission.

6. [Sports Wagering Division](#) (2:17:30)

a. [Commission Consideration to Remove League from Event Catalog per 205 CMR 247](#) (2:17:35)

Sports Wagering Operations Manager Andrew Steffen introduced for the Commission's consideration the issue and the investigation behind the recommendation for the removal of the

International Boxing Association (“IBA”), which was run by a Russian national, from the Massachusetts Event Catalog, *as outlined on pages 105-107 of the Commissioners’ Packet*.

Commissioner Skinner stated her support for the recommendation and asked if the fact that the operations were run from Russia was enough for a revocation of the approval. Deputy General Counsel Carrie Torrisi stated that as the catalog contained restrictions related to Russia and Belarus and the related regulations give the Commission broad authority to determine what is and what is not in the catalog, the Commission could draw the conclusion that it intended to exclude this league from the catalog. Interim Chair Maynard asked how the outstanding wagers were to be settled. Mr. Steffen replied by stating that the process would involve cease-and-desist notifications to the operators or operator updates. Commissioner O’Brien expressed her support for the recommendation.

Commissioner Hill moved that the Commission revoke its prior approval of the IBA to be included in the official catalog of events and wagers in accordance with 205 CMR 247.03(8) as included in the Commissioners’ packet and discussed here today, and that the staff be authorized to remove the IBA from the official catalog of events and wagers posted on the Commission’s website. Commissioner O’Brien seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

b. [Request for Amendment to House Rules: Fanatics](#) (2:27:45)

Mr. Steffen introduced and reviewed amendments to the house rules of FBG Enterprises Opco, LLC d/b/a Fanatics Betting & Gaming (“Fanatics”), *as outlined on pages 108-114 of the Commissioners’ Packet*.

Commissioner O’Brien moved that the Commission approve the updates to Fanatics’ House Rules 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.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

Transcriber’s notes: The Commission went on a break at [2:33:43](#) and returned at [2:39:55](#).

7. [Research and Responsible Gaming](#) (2:40:45)

Interim Chair Maynard announced the return of the Commission. Roll call attendance was conducted, and all four Commissioners were present for the meeting.

a. [AI Working Group Update](#) (2:41:39)

Director of Research and Responsible Gaming Mark Vander Linden noted that the Commission expressed an interest a year ago in the utilization of Artificial Intelligence (“AI”) technology for the purpose of responsible gaming. He stated that the Commission decided to form a working group to review this topic. Mr. Vander Linden proceeded to give updates on the working group, *which were described on page 115 of the Commissioners’ Packet.*

Commissioner Skinner thanked Mr. Vander Linden for the information he provided to the Commission and asked him to share the “AI best practices” outlined by the International Gaming Standards Association.

Mr. Vander Linden stated that the Commission’s collaboration with other jurisdictions was essential, especially in regard to responsible gaming.

8. [Discussion regarding collective bargaining of the SEIU Local 888 Agreement](#) (2:52:21)

a. Executive Session

Transcriber’s note: Discussion of this agenda item occurred after Agenda Item numbers 10 and 11, at which time the Commission returned to this Agenda Item at the above-noted time.

Interim Chair Maynard read the following language into the record: “The Commission anticipates that it will meet in executive session in accordance with G.L. c. 30A, §21(a)(3) to discuss strategy with respect to collective bargaining of the SEIU Local 888 Agreement, as discussion at an open meeting may have a detrimental effect on the bargaining position of the Commission.”

Commissioner Skinner moved that the Commission enter into executive session for the reasons stated on the record by the Chair. Commissioner O’Brien seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

Interim Chair Maynard stated that before entering the executive session, the Commission would consider Agenda Item number 9.

9. [Legal](#) (2:54:30)

Interim Chair Maynard read the following language into the record: “The Commission anticipates that it will meet in executive session to review minutes from previous executive sessions, as their discussion at an open meeting may frustrate the intended purpose for which the executive sessions were convened pursuant to: G.L. c. 30A, §21(a)(4), c. 30A, §21(a)(7), and G.L. c. 4, §7(26)(f): May, 10, 2023.”

Commissioner O’Brien moved that the Commission enter into executive session on the matter for the reasons stated by the Chair. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Interim Chair Maynard: Aye.

The motion passed unanimously, 4-0.

10. [Commissioner Updates](#) (2:52:00)

After inquiry by Interim Chair Maynard, no Commissioner Updates were noted.

11. [Other Business](#) (2:52:14)

No other business was raised by the Commissioners prior to entering the executive session.

Transcriber’s note: The Commission entered executive session upon their vote and did not reconvene the public meeting.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda](#) dated August 13, 2024
2. [Commissioners’ Packet](#) from the August 15, 2024, meeting (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: July 22, 2025, 12:00 p.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 112 443 6361

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

Commissioners Present:

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

1. Call to Order (00:00)

Chair Maynard called to order the 559th 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 (00:34)

a. Presentation of Sports Wagering Operators Q1 Quarterly Reports (00:45)

i. Caesars Sportsbook (01:08)

American Wagering, Inc. d/b/a Caesars Sportsbook ("Caesars") presented their Q1 2025 Quarterly Sports Wagering Report. *A copy of their presentation is found in the Commissioners' Packet on pages 5-19.* Vice President of Compliance and Licensing Lisa Rankin reviewed Caesars' Q1 2025 revenue in comparison with Q4 2024.

Senior Vice President of Corporate Social Responsibility and Internal Communications Kierstin Flint presented Caesars' workforce diversity data and their Corporate Social Responsibility 2024 Report highlights. Commissioner Skinner briefly praised Caesars' initiatives. Commissioner Brodeur asked if the employees had health clinic access on site, which Senior Vice President Flint confirmed by stating that there were 13 locations across the company alongside virtual care.

Vice President of Procurement David Schulte presented Caesars' total vendor/supplier/engagement spend, including Massachusetts-related spend.

Vice President Rankin discussed Caesars' compliance data. Commissioner O'Brien asked to hear more detail on how underage monitoring flagged those prohibited players. Vice President Rankin stated that there was a major component in account review that caused the flag and noted that she would be able to provide more detail in an executive session.

Responsible Gaming Program Director Carolene Layugan shared Caesars' responsible gaming information. She mentioned that Caesars sent an email to online customers which informed them about GameSense Advisor contact information and the Gambling Disorder Screening Day on March 11. The email was delivered to 10,021 online customers and opened by 2,048 of them. Commissioner O'Brien asked if that was the typical ratio of emails delivered to opened. Director Layugan stated that it was the second email campaign conducted, and she did not know the numbers for the previous campaign.

Vice President Rankin briefly described Caesars' lottery engagement and concluded the presentation.

Commissioner Skinner requested that all of the sports wagering operators identify their representations on diversity goals noted during the application process and compare them to where they are at now in order to provide more context to the diversity data. Ms. Flint stated that Caesars would follow up on that request.

Commissioner Brodeur asked Chief of the Sports Wagering Division Carrie Torrisi to provide an overview on the intake of the underage cases by the Division. Chief Torrisi stated that all underage incidents were reviewed by the Commission's Gaming Enforcement Unit.

- [Executive Session](#) (33:45)

Chair Maynard stated that the Commission anticipated that it may meet in executive session in accordance with G.L. c. 30A, § 21(a)(7) and G.L. c. 4, § 7(26)(n) to review certain materials in connection with the sports wagering operators' policies and procedures, as approved by the Commission in accordance with 205 CMR 238.20 and/or 238.33, to prevent access by underage individuals as these matters relate to cyber security in the Commonwealth, and the discussion or public disclosure of which is likely to jeopardize public safety or cyber security.

Commissioner O'Brien moved that the Commission enter executive session on the matter and for the reasons just stated by the Chair. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

Transcriber's note: The Commission entered executive session at [34:52](#) and reconvened the public session of this meeting at [42:17](#).

II. [DraftKings](#) (42:41)

Crown MA Gaming, LLC d/b/a DraftKings ("DraftKings") presented their Q1 2025 Quarterly Sports Wagering Report. *A copy of their presentation is found in the Commissioners' Packet on pages 20-48.* Senior Director of Regulatory Operations Jake List reviewed DraftKings' Q1 2025 revenue in comparison with Q4 2024.

Vice President of Inclusion Equity and Belonging Cristina Ackas presented DraftKings' Q1 2025 workforce diversity data, recruitment events, and development trainings. She also presented DraftKings' Q1 2025 vendor/supplier diversity spend statistics.

Director List described DraftKings' compliance data. Commissioner O'Brien noted that the number of registration attempts was markedly higher than other operators and asked why that was such a discrepancy. Director List stated that it was DraftKings' first time presenting the statistic. Chief Torrisi stated that the Commission's Sports Wagering Division would look into it.

Senior Manager of Responsible Gaming Julie Hynes presented DraftKings' responsible gaming information and efforts.

Director of Communications Jared Hess discussed DraftKings' community, outreach and charitable impacts.

Commissioner O'Brien asked the Commission's Sports Wagering Division to coordinate with the operators on getting the answers to the previously asked question on underage determination processes. Chair Maynard and the Commissioners supported Commissioner O'Brien's proposition.

III. [Bally's](#) (1:10:55)

Bally's Interactive, LLC d/b/a Bally Bet ("Bally's") presented their Q1 2025 Quarterly Sports Wagering Report. *A copy of their presentation is found in the Commissioners' Packet on pages 49-61.* Director of Compliance Kim McAllister reviewed Bally's Q1 2025 revenue.

Executive Director of Diversity, Equity, and Inclusion Tracey Wiley presented Bally's workforce diversity statistics and goals. Director of Procurement Analysis and Diversity Spend Nancy Duvall presented the information on Bally's vendor/supplier spend and supplier diversity.

Director McAllister continued by presenting Bally's compliance metrics. Commissioner O'Brien asked if, due to their use of Artificial Intelligence to deny registration of underage users, those numbers were counted towards their compliance metrics. Director McAllister noted that those users were not allowed to register in the first place.

Head of Responsible Gaming Scott Nejrup shared Bally's responsible gaming program highlights. Commissioner Brodeur asked about the possibility of Bally's expanding a Rhode Island responsible gaming outreach program into Massachusetts. Mr. Nejrup stated that the program was a pilot, and due to its success, Bally's would look into implementing it in Massachusetts. Mr. Nejrup continued to present on Bally's responsible gaming tools.

IV. BetMGM (1:35:14)

BetMGM, LLC d/b/a BetMGM ("BetMGM") presented their Q1 2025 Quarterly Sports Wagering Report. *A copy of their presentation is found in the Commissioners' Packet on pages 62-87.* Senior Director of Compliance Sarah Brennan reviewed BetMGM's Q1 2025 revenue in comparison with Q4 2024 and presented BetMGM's vendor utility, both global and local.

Senior Director of DEI Jazmin Polite shared BetMGM's diversity statistics and programs. Commissioner Skinner asked if BetMGM had plans to increase recruitment efforts in the Commonwealth. Director Polite said that BetMGM was looking to identify more opportunities to recruit employees, including online job boards and in-person events. Commissioner Skinner applauded BetMGM's increase in the race/ethnicity voluntary identification statistics and asked what efforts were used to improve those numbers. Director Polite stated that it was primarily due to strong communication to their employees on the importance of the race/ethnicity information.

Director of Responsible Gaming Richard Taylor reviewed BetMGM's compliance data. In response to Commissioner O'Brien's previously asked question, he noted that BetMGM's system did not allow those under the age of 21 to enter a date of birth. Commissioner O'Brien asked if those who enter a date of birth under 21 were captured in the data report. Senior Manager of Suspicious Activity and Fraud Andrew Soles stated that the attempt to enter a date of birth under 21 was not captured and the individual was not allowed to proceed with the registration. Commissioner O'Brien asked if after a failed attempt the individual tried inputting their age as above 21, would the system capture the attempt. Mr. Soles said that the individual that provided an incorrect date of birth would not be able to pass the verification system.

Director Taylor continued the presentation by sharing BetMGM's responsible gaming data and efforts.

Director Polite discussed BetMGM's community, outreach and charitable impacts.

Transcriber's note: The Commission went on a break at 2:04:50 and returned at 2:16:56.

V. Fanatics Betting and Gaming (2:17:27)

Chair Maynard announced the return of the Commission. Roll call attendance was conducted, and all five Commissioners were present for the meeting.

FBG Enterprises Opco, LLC d/b/a Fanatics Betting & Gaming (“Fanatics”) presented their Q1 2025 Quarterly Sports Wagering Report. *A copy of their presentation is found in the Commissioners’ Packet on pages 88-106.* Senior Regulatory Counsel Michael Levine discussed Fanatics’ Q1 2025 revenue.

Senior Director of People Operations Stephanie Althouse presented Fanatics’ workforce diversity metrics, goals and initiatives.

Mr. Levine discussed Fanatics’ diverse and Massachusetts-specific spend.

Responsible Gaming Senior Manager Anthony D’Angelo presented on Fanatics’ responsible gaming metrics, tools and programs. Commissioner O’Brien asked if Fanatics captured failed registration attempts for underage users. Mr. D’Angelo stated that there was no opportunity for an individual to advance if they were under 21.

Mr. Levine further discussed Fanatics’ community, outreach and charitable impacts. Commissioner Hill thanked Fanatics for their continued work with the Make-A-Wish Foundation.

VI. FanDuel (2:39:35)

Betfair Interactive US, LLC d/b/a FanDuel (“FanDuel”) presented their Q1 2025 Quarterly Sports Wagering Report. *A copy of their presentation is found in the Commissioners’ Packet on pages 107-121.* Vice President of Regulatory Richard Cooper discussed FanDuel’s Q1 2025 revenue and compliance. Commissioner O’Brien noted that the operators would receive a follow-up request for information regarding underage access on their platforms.

Senior Manager of Responsible Gaming Cam Zuckert reported on FanDuel’s responsible gaming tools and metrics.

Vice President of Community Impact Keita Young presented on FanDuel’s community impact efforts and supplier relations.

Head of Inclusion, Learning & Engagement J.J. Jelks discussed FanDuel’s engagement principles, employee development initiatives, and workforce diversity metrics.

VII. Penn Sports Interactive (3:08:16)

Penn Sports Interactive, LLC (“PSI”) presented their Q1 2025 Quarterly Sports Wagering Report. *A copy of their presentation is found in the Commissioners’ Packet on pages 122-136.*

Senior Director of Partnerships and Business Development Adam Kates reviewed PSI's Q1 2025 revenue. He further presented on PSI's workforce diversity metrics and diversity spend.

Director of Regulatory Compliance Amanda Gaffney discussed PSI's compliance and responsible gaming data.

Director Kates reviewed PSI's lottery promotion. Director Gaffney concluded the presentation by discussing PSI's community outreach.

3. [Commissioner Updates](#) (3:16:32)

Commissioner Brodeur commented that Polymarket was re-entering the United States market as the Department of Justice dropped ongoing investigations into the entity. He noted that the operators' quarterly report presentations demonstrated the value of legalized gambling with robust supervision, unlike Polymarket which would not fall under the control of the Commission.

Chair Maynard reminded the residents of the Commonwealth that the legal operators were the best choice for betting. Commissioner Skinner followed up by suggesting that the Commission should create a public service announcement to reach broader audiences to deliver the message about choosing the legal operators. Commissioner O'Brien agreed and noted that the Commission had conversations with the Attorney General's Office about similar public service announcements.

4. [Other Business](#) (3:23:22)

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

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner 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 July 18, 2025
2. [Commissioners' Packet](#) from the July 22, 2025 meeting (posted on massgaming.com)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: August 14, 2025, 10:00 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 919 2761

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

Commissioners Present:

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

1. [Call to Order](#) (00:00) - 1004

Chair Maynard called to order the 561st Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

2. [Meeting Minutes](#) (00:32)

Minutes for the February 22, 2024, April 3, 2024, October 24, 2024, and July 1, 2025 public meetings were included in the Commissioners' Packet on pages 5 through 30.

Commissioner Brodeur moved that the Commission approve the minutes from the following public meetings, as included in the Commissioners' packet, subject to any necessary corrections for typographical errors or other non-material matters: February 22, 2024 and April 3, 2024. Commissioner Skinner seconded the motion.

Roll call vote:

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

The motion passed unanimously, 4-0 with one abstention.

Commissioner Brodeur moved that the Commission approve the minutes from the following public meeting, as included in the Commissioners' packet, subject to any necessary corrections for typographical errors or other non-material matters: October 24, 2024. Commissioner O'Brien seconded the motion.

Roll call vote:
Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Abstain.
Commissioner Brodeur: Abstain.
Chair Maynard: Aye.

The motion passed unanimously, 3-0 with two abstentions.

Commissioner Brodeur moved that the Commission approve the minutes from the following public meeting, as included in the Commissioners' packet, subject to any necessary corrections for typographical errors or other non-material matters: July 1, 2025. 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.

2. Research and Responsible Gaming (03:38)

a. Presentation of report, "The Impact of Legalized Gambling on Recovery Communities: A Community-Based Participatory Research Study"

Mark Vander Linden, Director of Research and Responsible Gaming, explained that G.L. c. 23K and G.L. c. 23N required the Commission to carry out research on populations disproportionately impacted by gambling in the Commonwealth. He stated that the Commission approved a research grant to Texas Tech University to explore the impact of gambling on recovery communities in partnership with the Massachusetts Council on Gaming and Health ("MACGH"). He stated that the research explored several questions regarding recovery and sought to determine what indicators affected recovery.

Dr. Devin Mills, Assistant Professor with the Department of Community, Family, and Addiction Sciences from Texas Tech University introduced Travis Spencer, Graduate Research Assistant at Texas Tech University. Dr. Mills and Mr. Spencer presented a report titled “The Impact of Legalized Gambling on Recovery Communities: A Community-Based Participatory Research Study”. Topics in the report included the following: objectives, the current gambling landscape, understanding recovery, risk factors, support systems, impact of legalized gambling on recovery communities, and recommendations. *The report and presentation were included in the Commissioners’ Packet on pages 31 through 111.*

Commissioner O’Brien asked if the focus group participants suggested any wording changes to the phrase “responsible gaming”. Dr. Mills stated that the focus groups discussed safer gambling practices but that there were different interpretations of what “safer” meant among the participants. He stated that a community-based study with players might be able to look into what language was best. He stated that the research did not result in recommendations regarding what terms to use. Mr. Spencer stated that there was a conversation in a breakout group regarding the term “accountable gaming” but expressed that this term might not fully capture the intent of responsible gaming advocates.

Commissioner Hill noted that the research indicated that the legalization of sports betting had increased harms without an increase of treatment options. He noted that GameSense, the Department of Public Health, and the Massachusetts Council on Gaming and Health had information regarding treatment options available to the public. Dr. Mills explained that the report was qualitative based upon responses received and that there may be a gap in awareness between what is available and what is known. He stated that the claims that there was no increase in treatment options were based upon the perceptions of those interviewed and may not necessarily be true.

Commissioner Hill noted that the opiate issue in Massachusetts was addressed by adopting legislation to educate the public that there was help for those who were addicted. He stated that it would take time to educate the public but that harm could be reduced significantly if the Commission adopted a similar approach. Dr. Mills stated that there would not be an immediate effect based on this work as it would take time to reach the masses and develop trust with the public. He stated that resources were available in Massachusetts, but the individuals interviewed did not feel like there were enough.

Chair Maynard noted that the research was centered on a focus group and not a wide-reaching poll. He stated that the results were what the focus group qualitatively thought. Commissioner Brodeur stated that part of the legislative mandate related to sports wagering was to create opportunities for growth and minimize harm. He noted that there were individuals facing addiction challenges that were presumably not in the focus group, such as incarcerated individuals. He asked if there would be value in a pilot program offering problem gambling resources for incarcerated individuals. Dr. Mills stated there would be value in that program, but it was not considered in this research sample. Chair Maynard stated that there was the opportunity for additional research there.

Dr. Mills noted that New Jersey was piloting a gambling court for those convicted of a crime with a gambling-related component. He stated that research was supportive of treatment courts in general in addition to some programing in the justice system.

Director Vander Linden thanked the presenters. He stated that they asked difficult questions and did a great job of engaging the recovery community. He stated that this type of research was intended to be a deep dive into specific communities and to add color to quantitative data. He stated that another community-engaged research project would be presented to the Commission in a couple of weeks.

3. Community Affairs Division (49:04)

a. Encore Boston Harbor Quarterly Report

Encore Boston Harbor's ("EBH") Executive Director of Legal Juliana Catanzariti and EBH's Executive Director of Security and Investigations Tom Coffey presented EBH's quarterly report with topics including the following: taxes, lottery sales, workforce diversity, vendor diversity, compliance, HR initiatives, and community outreach. *EBH's quarterly report presentation was included in the Commissioners' Packet on pages 112 through 137.*

Commissioner O'Brien inquired about the minor who was on the gaming floor for four hours and thirty-five minutes as reported. Mr. Coffey stated that there was an identification swap and that the minor had used a valid identification from another individual. He stated that the minor entered the gaming floor several times over a two-week period. He stated that security staff were going through remedial training on identification swaps.

Commissioner Hill noted that EBH's veteran employment numbers were stagnant and asked if EBH was doing outreach to the veteran community. Ms. Catanzariti stated that EBH partnered with veteran groups. She noted that some veterans chose not to disclose that they were veterans. She noted that she believed EBH had more veterans than reported. She stated that EBH worked with community partners and did open postings for job listings.

Commissioner Hill inquired about the decrease in lottery revenues at EBH. Ms. Catanzariti stated that EBH upgraded to new lottery machines, but the decline was due to a reorganization of cross-promotions with the lottery. She stated that a lottery promotion was pushed into the next quarter on the promotional schedule.

Commissioner Brodeur asked about the scope of EBH's college care package promotion. Ms. Catanzariti explained that EBH partnered with an organization called Bottom Line to provide care packages to college students during finals. She stated that EBH purchased supplies, and staff compiled the care packages before sending them to Bottom Line. She noted that she could send the Commission more information.

b. MGM Springfield Quarterly Report (1:02:14)

MGM Springfield's ("MGM") Vice President & Legal Counsel Gus Kim, MGM's Vice President of Finance Arlen Carballo, and MGM's Director of Public Affairs Beth Ward

presented MGM's quarterly report with topics including the following: taxes, lottery sales, workforce diversity, vendor diversity, compliance, community outreach, and entertainment. *MGM's quarterly report presentation was included in the Commissioners' Packet on pages 138 through 163.*

c. Discussion of FY2027 Community Mitigation Fund Grant Cycle (1:18:02)

Chief of the Community Affairs Division Joe Delaney explained that the Community Affairs Division was seeking guidance from the Commission regarding the Community Mitigation Fund grant program. He noted that the Community Mitigation Fund had approximately \$5.9 million available for the FY2027 fiscal year. He stated that this amount is approximately 30% of what was distributed in prior years and that there would be significant reductions in grants. *A memorandum regarding FY 2027 Community Mitigation Fund Policy Questions was included in the Commissioners' Packet on Pages 164 through 171.*

Chief Delaney stated that he wanted Commission input on four issues. The first issue was how funds should be split among the regions. He explained that the second issue was how much funding should be utilized for communities and how much funding should be provided to regional agencies. He asked if the Commission would want to make changes to the eligibility of municipalities. He explained that the last issue was whether the Commission wanted to make changes to the eligibility of regional agencies.

Chief Delaney noted that the Local Casino Mitigation Advisory Committees ("LCMAC") from both regions reached a consensus that the main focus of funds should be spent on municipalities with less funds being sent to regional agencies. He stated that both regions supported funding the workforce grants.

Chief Delaney noted that for the past two years, 66% of funds went to Region A, 30% of funds went to Region B, and 4% of funds went to Category 2 communities. Commissioner Hill expressed that he was comfortable with maintaining the block grant structure as it was in previous years as the block grant formula worked well. He stated that the structure should not be changed just because there were less funds available.

Commissioner Skinner stated that she agreed with Commissioner Hill. She stated that maintaining the existing block grant structure was the path of least resistance. She expressed that she did not want to have to determine which projects submitted would be more worthy of funding.

Chair Maynard stated that every application would have to be judged on its merit. Commissioner Brodeur stated that it was the Commission's job to make hard choices. He expressed concern that maintaining the status quo would result in some communities receiving de minimis amounts. Chair Maynard stated that he wanted the funds to go to the projects that presented the highest and best use for the funds. He noted that funding for the Community Mitigation Fund had been swept by the Legislature for two years now, but there was a possibility of funding being restored in the future.

Chief Delaney stated that the block grant formula could be applied to the reduced funds but that it was difficult to determine what amount of funds were going to be requested by regional agencies. He noted that District Attorneys' Offices ("DAs") were limited to \$100,000 in funding but that it was not clear how many DAs were going to apply.

Commissioner Skinner asked what factors would be considered to help the Commission evaluate what projects would result in the highest and best use for communities. She stated that if there was a significant project, the Commission would not want to be in the position of denying full funding due to adhering to the block grant guidelines. She expressed interest in identifying which factors would be considered a "higher use" of grant funding. Chair Maynard agreed.

Commissioner Hill stated that it was a subjective opinion and that each Commissioner would value different factors. He noted that the Commission moved to the block grant structure to remove subjectivity from the equation. He stated that it is not about the quality of the project but whether the project qualifies for funds. Commissioner Brodeur stated that the Commission would also have to develop guardrails regarding the funding giving the Community Mitigation Fund's new fiscal reality.

Chair Maynard stated that he would not judge painting the sidewalk and a public safety project the same. He stated that he wanted the Commission to have flexibility to say that one project is a better use of funds by comparison. He stated that ground rules would be important but that the Commission should have flexibility.

Chief Delaney stated that he planned to add this topic to the agenda for the September 11, 2025 public meeting at which point he would need a firm decision in order for his team to craft the Community Mitigation Fund guidelines. He noted that reducing the workforce grants from \$750,000 to \$250,000 would be a huge reduction that would lower the number of cohorts. He stated that if the Commission chose to have the flexibility to increase the workforce grants while reducing other grants, it may make sense. He stated that sticking to the block grant structure would also be easy to do.

4. Racing (1:59:27)

- a. Plainridge Park request to Reschedule the Cancelled Racing Day of June 23, 2025, to September 1, 2025

Director of Racing and Chief Veterinarian Dr. Alexandra Lightbown presented Plainridge Park Casino's ("PPC") request to reschedule the cancelled racing day of June 23, 2025. *PPC's request to reschedule the cancelled racing day was included in the Commissioner's Packet on pages 172 through 173.*

Commissioner Skinner noted that there were multiple dates listed in the memorandum and sought clarification regarding which racing day was cancelled. PPC's Director of Racing Steve O'Toole clarified that June 23, 2025 was the cancelled racing day.

Commissioner Skinner moved that the Commission approve Plainridge Park Casino's request to reschedule the race day previously scheduled for June 23, 2025 to September 1, 2025. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. Massasoit Greyhound Association, Inc. request to approve Churchill Downs Technology Initiatives Company platforms Twin Spires and DK Horse as Advance Deposit Wagering Providers in accordance with 205 CMR 6.20 (2:02:14)

Interim General Counsel Justin Stempeck explained that Massasoit Greyhound Association, Inc. d/b/a Raynham Park ("Raynham") had requested to use Churchill Downs Technologies ("Churchill Downs") as an Account Deposit Wagering ("ADW") provider. He stated that there was a robust discussion of this topic during the July 1, 2025 public meeting and that he had since sought further commentary from relevant stakeholders. *Materials regarding MGA's request to approve Churchill Down Technologies as an ADW provider were included in the Commissioners' Packet on pages 174 through 201.*

Counsel Stempeck stated that he spoke with the Racing Division and outside counsel and concluded that the limitations in the simulcast statute, G.L. c. 128C, § 2, were incorporated into the ADW statute in G.L. c. 128A, § 5(c). He stated that this was a consistent reading of the two statutes together. Commissioner Hill expressed appreciation for all of the input received from relevant stakeholders.

Attorney Michael Morizio, Counsel for Raynham, stated that he disagreed with Counsel Stempeck's summation. He stated that Section 92 of Chapter 194 of the Acts of 2011 superseded G.L. c. 128C, § 2. He stated that the simulcast statute set up minimum rights but that the Commission had authority under G.L. c. 128 C, § 8 to expand upon those rights, which included the authority to grant more simulcasting rights. He requested that the Commission approve Churchill Downs as an ADW provider for Raynham.

Chair Maynard thanked Attorney Morizio for his input and noted that the Commission received a copy of Raynham's argument in the submitted letter. Counsel Stempeck noted that G.L. c. 128A, § 5(c) referenced G.L. c. 128C and stated that the ADW statute specifically incorporated the simulcast statute. He stated that it was difficult to read the ADW statute in a way that would not incorporate the limitations of the simulcast statute.

Attorney Morizio stated that G.L. c. 128A, § 5(c) was intended to allow operators to conduct ADW in conjunction with simulcasting without violating laws regarding off-track betting. He

stated that there was nothing in the regulations that would require an examination of the simulcast schedule before the Commission approved an ADW service provider.

Commissioner Hill stated that he was considering granting Raynham's request without the simulcast restrictions. He stated that the topic needed further discussion and that the Commission had previously allowed Raynham to have ADW signals. He reiterated that he would allow Raynham's request without restrictions.

Attorney Bruce Barnett, representing Sterling Suffolk Racecourse, LLC d/b/a Suffolk Downs ("Suffolk Downs"), stated that Attorney Morizio's explanation did not capture the significant restrictions on all simulcast licensees located in G.L. c. 128C, § 2. He noted that G.L. c. 128A, § 5(c) did not only give the Commission a role in approving ADW providers, it also authorized ADW. He stated that Section 92 of the Expanded Gaming Act authorized Raynham and Wonderland to continue holding a racing meeting license and that the rights were not expanded beyond what it had previously. He stated that Raynham was bound by the restrictions in G.L. c. 128A and G.L. c. 128C.

Commissioner Skinner asked what the advantages and disadvantages would be for enforcing these restrictions on ADW. Dr. Lightbown stated that the licensees see which tracks are racing and pick the signals that would be most economically favorable. She stated that the restrictions would limit the number of signals on certain days. She stated that the restrictions would have an effect on how the licensee chooses which signals to receive. She noted that the Commission approved all potential signals the licensee may want to use but that the licensee was not obligated to use every requested signal. She stated that the licensee would request more signals than it may use so that it would not have to request a modification.

Commissioner Skinner asked why one licensee might take issue with the signals another licensee was receiving. Mr. O'Toole stated that when the legislation was adopted, restrictions were put in place to protect a delicate balance between the racing licensees. He stated that if PPC was offering signals Raynham could not offer, it would attract additional customers. He stated that the restrictions gave each licensee a competitive angle and that each licensee agreed to that provision.

Mr. O'Toole stated that the balance had shifted due to the limited costs for licensees that had ceased racing. He stated that PPC complied with the restrictions and that he wanted to ensure that restrictions remained while PPC was the only licensee offering live racing.

Attorney Morizio stated that there was no valid reason for any licensee to object to simulcasting by another licensee. He stated that the only reason to do so would be to try to monopolize the industry to the detriment of the public. He stated that the industry is better when businesses grow cooperatively. He stated that it was in the public interest and the industry's interest to allow Raynham's application.

Attorney Barnett stated that the intent was not to hurt other tracks. He explained that it was a matter of statutory interpretation and that the words in G.L. c. 128A, § 5(c) should have meaning. He explained that the Legislature had every opportunity to revise the restrictions set

forth in G.L. c. 128A, § 5(c) and free up ADW from the restrictions cross-referenced in G.L. c. 128C, § 2, but the Legislature had not done so.

Senior Counsel at Churchill Downs Andrew Silver stated that by statute, simulcast referred to the way in which races were broadcast, but they did not speak to how wagers were placed. He stated that the simulcast restrictions did not encompass ADW. He expressed support for Commissioner Hill's approach. He stated that Churchill Downs did not enter an agreement with Raynham contemplating that there would be limited or conditional approval. He stated that there could be operational consequences to conditioning the approval of the ADW provider. Chair Maynard stated that he spoke with Director Lightbown and that there might be implementation challenges with regard to imposing the restrictions.

Commissioner Brodeur expressed that it was his understanding that Churchill Downs took the position that no approval was necessary for ADW signals at the state level due to federal pre-emption. Attorney Silver stated that Churchill Downs put forward that position in a court case in Michigan but that Churchill Downs worked to comply with state law in a reasonable fashion when possible. He stated that Churchill Downs followed state law when there was a reasonable path to do so.

Commissioner Brodeur noted that the restrictions were in place by statute and that the Commission did not have the authority to vary or depart from the statutory scheme. He stated that prior approval of ADW signals that was done at odds with the statute were not a good place of reliance. He asked how the stakeholders could reconcile that they are asking the Commission to vary from what the statute says depending on interpretation.

Attorney Silver stated that the ADW statute provided the statutory floor of what is required at a minimum and that approval of additional tracks was consistent with the statute. Mr. O'Toole stated that when scheduling a daily menu of races, the track takes into consideration the statutory restrictions for that given day. He stated that signals could be added or removed to be compliant with the statute.

Attorney Morizio stated that the statutory scheme is confusing and that the restrictions applied to the minimum right each licensee has but did not limit the Commission's authority under G.L. c. 128C, § 8. He stated that the Commission had the authority to grant rights beyond the minimum set forth. He reiterated that Section 92 eliminated the restrictions set forth in G.L. c. 128C, § 2.

Attorney Barnett stated that the Legislature had made changes over the course of 15 years. He stated that Raynham was relieved of the obligation to pay simulcasting premiums to Suffolk Downs due to changes in the industry. He stated that the Legislature did not adjust the simulcast restrictions and that the Commission did not have the authority to disregard legislative directive.

Mr. O'Toole stated that the restrictions were implemented to protect live racing and create a delicate balance between the racing licensees. He stated that the statutorily required restrictions were still in place.

Commissioner O'Brien asked Counsel Stempeck if there was anything in his memorandum that needed further explanation or amendment. Counsel Stempeck noted that Churchill Downs' initial letter was in the meeting packet for the July 1, 2025 public meeting but was not included in this meeting's materials. He stated that G.L. c. 128C, § 2 is still good law. He stated that G.L. c. 128C, § 8 only gave the Commission the power to promulgate regulations, not the authority to promulgate regulations which run counter to a statutory provision. He stated that there was a balancing act between the licensees that was considered when the Legislature enacted the simulcast restrictions and that he would hypothesize that G.L. c. 128A, § 5(c) was included to carry over that balancing act to the ADW provisions. He reiterated his opinion that the restrictions remained in place and stated that it was difficult to ignore black letter law.

Commissioner O'Brien stated that if she were to vote consistent with Counsel Stempeck's statutory interpretation, she would want to know the practical implications and timelines for vendors to be in compliance. She stated that she was not in alignment with Commissioner Hill's suggestion that the Commission move forward and circle back to this discussion at a later point.

Chair Maynard asked if it was possible to give the licensees a runway for compliance. Counsel Stempeck stated that the Commission would have to build in time for licensees to come into compliance as this would be a change of interpretation that affects work with licensees. He stated that staff would speak to the licensees about an implementation timeline and get feedback regarding the impact this will have. Chair Maynard stated that the licensees should be given time to comply with the restrictions as there was a reliance on the Commission approving ADW signals in the past. Commissioner Brodeur stated that the Commission was bound by the statutory restrictions in deciding how to move forward.

Commissioner Hill moved that the Commission approve Massasoit Greyhound Association's request for approval for Churchill Downs Technology Initiatives Company, and its platform known as TwinSpires and DK Horse, as an advance deposit wagering provider. The motion was not seconded.

Commissioner O'Brien requested that the Commission staff meet with Raynham's staff to follow up on this discussion. Commissioner Skinner stated that the Commission staff would need to engage with the licensees to determine what the consequences would be in upsetting the status quo.

Attorney Silver stated that Churchill Downs had an agreement with Suffolk Downs and was operating in Massachusetts and stated that the request was to transition to Raynham as a partner. He noted that this matter had already been before the Commission twice and that Churchill Downs was not seeking a limited approval. Chair Maynard requested that the Commission staff return to this discussion with more information regarding implementation at the September 4, 2025 public meeting.

5. [Legal](#) (3:25:44)

a. Litigation Update

Executive Director Dean Serpa explained that the Commission had a human resources issue related to a complaint filed with the Massachusetts Commission Against Discrimination (“MCAD”). He stated that based on subject matter, it was appropriate for discussion in an executive session.

Chair Maynard stated that the Commission anticipated that it would convene in an Executive Session pursuant to G.L. c. 30A, § 21(a)(3) in conjunction with its review of litigation strategy with respect to an MCAD complaint, as discussion at an open meeting may have a detrimental effect on the litigation position of the Commission.

Commissioner Brodeur moved that the Commission enter an executive session on the matter and for the reasons just stated by the Chair. 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. Executive Session Minutes (3:27:36)

Chair Maynard stated that the Commission anticipated that it would meet in executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the intended purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(7) and c. 23N, § 6(i): May 23, 2023; G.L. c. 30A, § 21(a)(2): December 20, 2023; G.L. c. 30A, § 21(a)(7) and c. 4, § 7(26)(n): June 17, 2025 at 2:07 P.M.; and G.L. c. 30A, § 21(a)(3) and (7) and c. 4, § 7(26)(n): June 17, 2025 at 2:21 P.M.

Commissioner Brodeur moved that the Commission enter an executive session on the matter and for the reasons just stated by the Chair. 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.

Transcriber’s Note: The Commission entered an executive session at 3:29:36 in the meeting video and returned to the public meeting session at 4:35:18 in the meeting video.

6. Sports Wagering Division (4:35:52)

a. House Rules Update

I. DraftKings

Sports Wagering Compliance and Operations Manager Andrew Steffen presented a proposed House Rules update from DraftKings. He noted that the structure of the house rules was rewritten but that the rules largely remained the same. *The proposed changes to DraftKings' House Rules were included in the Commissioners' Packet on pages 202 through 455.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

II. [BetMGM](#) (4:39:10)

Sports Wagering Compliance and Operations Manager Tom Lam presented proposed changes to BetMGM's house rules. *The proposed changes to BetMGM's House Rules were included in the Commissioners' Packet on pages 456 through 457.*

Commissioner Hill moved that the Commission approve the updates to BetMGM's House Rules 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.

III. [MGM Springfield](#) (4:41:13)

Mr. Lam presented proposed changes to MGM Springfield's house rules. *The proposed changes to MGM Springfield's House Rules were included in the Commissioners' Packet on pages 458 through 459.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

IV. [FanDuel](#) (4:43:26)

Mr. Lam presented proposed changes to FanDuel's House Rules. *The proposed changes to FanDuel's House Rules were included in the Commissioners' Packet on pages 460 through 465.*

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

7. [Investigations and Enforcement Bureau](#) (4:50:22)

- a. Briefing on noncompliance matter related to Temporary Category 3 Sports Wagering Operator Betfair Interactive LLC, d/b/a FanDuel 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 explained that there was an alleged noncompliance incident involving FanDuel offering events that were not included in the Massachusetts Sports Wagering Catalog. She stated that wagers were offered on the Maharlika Pilipinas Basketball League ("MPBL") from June 4, 2024 through April 2, 2025. She stated that 62,851 wagers were placed in the amount of \$3,250,840. She stated that FanDuel self-reported this incident after a re-evaluation of the league's permissibility. She stated that FanDuel had relied upon their belief that the MPBL was a part of the FIBA member leagues, which are approved. *Materials regarding this noncompliance matter were included in the Commissioners' Packet on page 466.* She stated that a similar matter was presented to the Commission at the July 15, 2025 public meeting and that the matter was referred back to the Investigations and Enforcement Bureau ("IEB") for review.

Commissioner O'Brien noted that in the similar matter, the other operator had allowed wagers on the MPBL since launch. She stated that she had more questions regarding the timeframe of this incident as FanDuel did not offer the MPBL since launch, choosing to add it and then remove it. She stated that the time period that wagers were allowed, the number of wagers, and the number of wagers was striking. The Commission reached a consensus to refer this matter back to the IEB for a recommendation.

b. Briefing on noncompliance matter related to Category 3 Sports Wagering Operator Crown MA Gaming, LLC d/b/a DraftKings 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. (4:53:59)

Counsel Franks explained that DraftKings had also offered wagering on the MPBL between March 14, 2023 and April 11, 2025. She stated that 151,508 wagers were accepted for a sum of \$7,493,177. She stated that this was discovered by the Sports Wagering Division when it came to their attention that the MPBL was not sanctioned by FIBA. Commissioner O'Brien stated that attention should be paid the length of time wagering was permitted and the amount of money wagered. The Commission reached a consensus to refer this matter back to the IEB for a recommendation.

c. Briefing on noncompliance matter related to Temporary Category 3 Sports Wagering Licensee Bally's Interactive LLC ("Bally's") and discussion regarding next steps. Alleged noncompliance relates to Bally's contacting individuals on Voluntary Self Exclusion List and in "cool-off" status in violation of 205 CMR 256.07 and 205 CMR 256.06 (4:55:55)

Enforcement Counsel Nathaniel Kennedy stated that the IEB was looking for guidance regarding an instance of noncompliance by Bally's. He explained that Bally's had sent promotional emails to an individual on the voluntary self-exclusion ("VSE") list and five promotional emails to a player who was on cool-off status. He stated that Bally's claimed the emails were sent due to a data processing error that did not treat the accounts as closed. *Materials regarding this noncompliance matter were included in the Commissioners' Packet on page 467.*

Commissioner O'Brien noted that it was interesting that the error only occurred twice. She expressed an interest in learning whether the investigation finds the issue to be more systemic. Counsel Kennedy stated that the IEB would look for more information when conducting the inquiry. The Commission reached a consensus to refer this matter back to the IEB for a recommendation.

d. Continued Discussion of Sports Wagering Noncompliance Matter Involving American Wagering, Inc., d/b/a Caesars Sportsbook a Category 3 Sports Wagering Operator. Alleged noncompliance relates to wagers offered on "Tournament Total Red Cards", an unauthorized event in violation of M.G.L. c. 23N, § 3 and 205 CMR 247.01(2)(e) (4:58:39)

Counsel Kennedy explained that on February 26, 2025, the IEB presented an issue of alleged noncompliance from Caesars Sportsbook (“Caesars”) regarding offering wagers on the total number of red cards in a tournament in contravention of G.L. c. 23N. He stated that six wagers were accepted totaling \$8,217 between June 27, 2024 and July 9, 2024.

Counsel Kennedy explained that the Commission elected to proceed with an adjudicatory hearing regarding a similar instance of noncompliance by BetMGM. He asked if the Commission wanted to proceed with an adjudicatory hearing or refer this matter back to the IEB for a recommendation.

Commissioner O’Brien asked if the reason for the error was the same as the previous hearing on red card wagers. Counsel Kennedy stated that it was unclear what the reason for the error was at this point as the IEB has only had preliminary conversations with Caesars. He noted that BetMGM’s volume of wagers on red cards was significantly higher than Caesars, accepting 2,564 wagers in the sum of \$42,690 over the course of a year.

Chair Maynard asked if the decision was released for the BetMGM incident. Counsel Kennedy stated that the decision had yet to be released. Chair Maynard stated that he was fine referring this matter back for an IEB recommendation but that he would want to review the decision on BetMGM’s noncompliance first. The Commission reached a consensus to refer this matter back to the IEB for a recommendation.

9. [Commissioner Updates](#) (5:02:35)

The Commissioner did not have any updates to provide.

10. [Other Business](#) (5:02:43)

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

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

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 12, 2025](#)
2. [Commissioner’s Packet from the August 14, 2025, meeting](#) (posted on massgaming.com)



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

From: Autumn Birarelli, Staff Attorney

Cc: Justin Stempeck, Interim General Counsel

Re: Finalizing proposed amendment to 205 CMR 115.04

Date: September 4, 2025

Enclosed for the Commission's review is the proposed final draft of 205 CMR 115.04: Phase 1 and new qualifier suitability determination, standards, and procedures. The amendment clarified the process for new qualifier suitability hearings going forward.

This regulation amendment was before the Commission for initial review at public meeting on July 15, 2025. After initial discussion and review the Commission voted to promulgate the regulation by the normal process. A public hearing was held on August 26, 2025. No comments pertaining to this regulation were provided and no edits have been made to the regulation since its presentation to the Commission on July 15, 2025.

We are seeking a vote to adopt the final version of the proposed regulation. The final version of the regulation and accompanying amended small business impact statement have been included in the Commissioners' Packet.



Massachusetts Gaming Commission

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 115.00: PHASE 1 AND NEW QUALIFIER SUITABILITY DETERMINATION, STANDARDS, AND PROCEDURES

Section

- 115.01: Phase 1 and New Qualifier Determination Standards
- 115.02: Phase 1 and New Qualifier Procedures
- 115.03: Phase 1 and New Qualifier Investigation and Recommendations by the Bureau
- 115.04: Phase 1 and New Qualifier Proceedings by the Commission
- 115.05: Phase 1 and New Qualifier Determination by the Commission

115.01 : Phase 1 and New Qualifier Determination Standards

- (1) Phase 1 Determination Standards. The Commission shall not issue an affirmative determination of suitability for any Category 1 or Category 2 applicants unless:
 - (a) The applicant meets the standards in M.G.L. c. 23K, §§ 12, 16, 46 and 47.
 - (b) The applicant complies with the provisions of 205 CMR 111.00: *Phase 1 Application Requirements* and 205 CMR 115.00.
 - (c) The Commission has determined that the applicant has demonstrated financial stability pursuant to 205 CMR 117.00: *Phase I Determination of Financial Stability*.
 - (d) All qualifiers under 205 CMR 116.02: *Persons Required to be Qualified* have been determined to be suitable by the Commission or received a waiver under 205 CMR 116.03: *Waivers*.
- (2) Burden of Proof. All applicants for a Phase 1 suitability determination must establish their qualifications by clear and convincing evidence.
- (3) New Qualifiers. Subsequent to the issuance of a positive determination of suitability in accordance with 205 CMR 115.05(3) relative to a gaming licensee or applicant for a gaming license, if a new person is designated by the bureau as a person required to be qualified in accordance with 205 CMR 116.02: *Persons Required to be Qualified*, they shall submit a completed application to the bureau. An entity qualifier shall submit to the bureau a *Business Entity Disclosure Form - Category 1 and Category 2 Entity Applicants and Holding/Intermediary Companies* in accordance with 205 CMR 111.02. An individual qualifier shall submit to the bureau a *Multi-jurisdictional Personal History Disclosure Form* in accordance with 205 CMR 111.03 and a *Massachusetts Supplemental Form* in accordance with 205 CMR 111.04. A new qualifier designated in accordance with 205 CMR 116.02: *Persons Required to be Qualified* must establish their qualifications and meet the standards in M.G.L. c. 23K, §§ 12 and 16 by clear and convincing evidence and shall be subject to all applicable procedures contained in 205 CMR 115.00.
- (4) Continuing Duty. Once issued a positive determination of suitability, the gaming licensee and all qualifiers shall have a continuing duty to maintain suitability in accordance with 205 CMR 115.01(1) and (2). The gaming licensee and each qualifier shall have a continuing duty to notify and update the IEB, in writing, within ten days of the occurrence, unless an alternative filing time is authorized by the executive director, or where applicable, gaining knowledge of the following:
 - (a) Any denial, suspension or revocation by a government agency in any jurisdiction of a gaming related license, registration, certification, permit or approval held by or applied for by the gaming licensee or qualifier;
 - (b) Any discipline, including a fine or warning, related to gaming operations imposed upon the gaming licensee or qualifier by any government agency in any jurisdiction;
 - (c) Any fine related to gaming operations assessed on any gaming entity owned or operated by the parent to the gaming licensee by any government agency in any jurisdiction.
 - (d) Any arrest, indictment, charge or criminal conviction of any qualifier in any jurisdiction;
 - (e) Any complaints, allegations, or notice of investigation thereof made or known to be contemplated by a gaming regulator or other governmental agency against the gaming licensee, qualifier, or any gaming entity owned or operated by the parent to the gaming licensee, of which the gaming licensee or qualifier is or should reasonably be aware, involving conduct that if substantiated could reasonably lead to potential revocation or suspension of the license or approval held by the gaming licensee, qualifier, or gaming entity owned or operated by the parent to the gaming licensee, in that jurisdiction and/or imposition of a fine of \$50,000 or greater;

115.01 : continued

- (f) Any reports, complaints, allegations, or material legal proceedings made, commenced, or known to be contemplated by a governmental agency against the gaming licensee or qualifier, of which the gaming licensee or qualifier is or should reasonably be aware, involving conduct that if substantiated could reasonably lead to potential criminal charges including, but not limited to, allegations of theft or embezzlement;
- (g) Any information known or that should reasonably be known to the gaming licensee or qualifier, including by way of receipt of a subpoena, that the gaming licensee or qualifier is or may be the subject of a criminal investigation by a law enforcement or regulatory agency;
- (h) Any exclusion or barring of a qualifier from any casino, gaming establishment or gambling/gaming related entity in any jurisdiction;
- (i) The termination, suspension from employment, or other discipline of any key gaming employee licensed in accordance with 205 CMR 134.00: *Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations* or qualifier;
- (j) Any material pending legal proceedings required to be reported in accordance with 17 CFR 229.103 - (Item 103) Legal proceedings. For purposes of 205 CMR 115.01(4)(j) the registrant referred to in 17 CFR 229.103 - (Item 103) shall be both the gaming licensee and the parent company of the gaming licensee as determined by the IEB. Additionally, the gaming licensee and each qualifier shall provide notice of any pending legal proceeding which includes any allegation of fraudulent conduct by the gaming licensee or a qualifier, that may reasonably threaten the economic viability of the gaming licensee or a qualifier, or that alleges a pattern of improper conduct by the gaming licensee or a qualifier over a sustained period of time;
- (k) Any significant financial event related to a gaming licensee or entity qualifier. For purposes of 205 CMR 115.01(4)(k), a significant financial event means a merger, acquisition, consolidation, debt restructuring, material change in debt rating by major credit rating agencies (US/International), legal entity change, material ownership change, the assessment of a fine or penalty of \$250,000 or greater by the SEC or international equivalent, restatement of previously issued financial statement(s), late filing of financial statement(s) with the SEC or international equivalent, US or international equivalent bankruptcy petition, default of financial debt covenants and receivership, disposal of a material business segment or asset, or adverse action(s) taken by the IRS;
- (l) Issuance of an "Adverse" or "Qualified" audit opinion, or the international equivalent, by an independent accountant to the gaming licensee or qualifier;
- (m) A change in accounting firm engaged to perform attestation and/or assurance services for the gaming licensee or qualifier; and
- (n) Issuance of a delisting notice from a United States or international stock exchange relative to the gaming licensee or qualifier.

115.02 : Phase 1 and New Qualifier Procedures

- (1) When a completed RFA-1 application, *Multi-jurisdictional Personal History Disclosure Form, Massachusetts Supplemental Form, or Business Entity Disclosure Form - Category 1 and Category 2 Entity Applicants and Holding/Intermediary Companies* is filed, the application shall be referred by the Commission to the bureau for a determination of completeness and investigation.
- (2) Determination of Administrative Completeness. After receiving the application containing the information required by 205 CMR 111.02: *Business Entity Disclosure Form - Category 1 and Category 2 Entity Applicants and Holding/Intermediary Companies* or 205 CMR 111.03: *Multi-jurisdictional Personal History Disclosure Form* and 205 CMR 111.04: *Massachusetts Supplemental Form*, the bureau will either determine that the application is sufficiently complete for purposes of initiating substantive review or request additional information from the applicant.
- (3) Notice. After the bureau has determined that an application is administratively complete, in accordance with 205 CMR 115.02(2), it shall notify the applicant or new qualifier of such determination.

115.03 : Phase 1 and New Qualifier Investigation and Recommendations by the Bureau

- (1) The bureau shall conduct an investigation into the qualifications and suitability of all applicants and qualifiers, as provided for in M.G.L. c. 23K, §§ 12 and 16. The bureau may conduct the investigation, in whole or in part, with the assistance of one or more contractor investigators pursuant to 205 CMR 105.10: *Authority to Retain and Utilize Contractor Investigators*. Additionally, such an investigation may be conducted at any time after a qualifier is granted a positive determination of suitability to ensure that they continue to meet the suitability standards.
- (2) At the completion of the bureau's investigation, it shall submit a written report to the Commission. At a minimum, this report will include: recommendations pursuant to M.G.L. c. 23K, §§ 12, 14(i) and 16 and findings of fact pursuant to M.G.L. c. 23K, § 17(f), as required, relative to the suitability of the applicant for a gaming license and/or of any new qualifiers or existing qualifiers.

115.04 : Phase 1 and New Qualifier Proceedings by the Commission

- (1) After the Commission has received the bureau's report under 205 CMR 115.03(2), it shall provide a copy to the applicant or qualifier and the Commission shall ~~determine whether to~~ initiate a process for an ~~public hearing or~~ adjudicatory proceeding. ~~However, the Commission may only utilize the public hearing process with the qualifier's consent.~~
- (2) Adjudicatory Proceeding. ~~If~~**When** the Commission determines that an adjudicatory proceeding shall be held, the Commission shall conduct an adjudicatory proceeding pursuant to 205 CMR 101.00: *M.G.L. c. 23K Adjudicatory Proceedings* on the report by the bureau concerning the applicant or qualifier pursuant to 205 CMR 115.03(2).

~~(3) Public Hearing. If the Commission determines that a public hearing should be held, the Commission shall review the bureau's suitability report in a public hearing, subject to redaction in accordance with M.G.L. c. 4, § 7(26). The Commission will issue a notice in advance of the public hearing stating the date, time and place of the hearing and the form (oral or written) and conditions pursuant to which the Commission will receive public comments.~~

115.05 : Phase 1 and New Qualifier Determination by the Commission

- (1) After the proceedings under 205 CMR 115.04, the Commission shall issue a written determination of suitability pursuant to M.G.L. c. 23K, §§ 4(15), 12 and 17.
- (2) Negative Determination. If the Commission finds that an applicant or new qualifier or existing qualifier failed to meet its burden of demonstrating compliance with the suitability standards in M.G.L. c. 23K and 205 CMR 115.00, the Commission shall issue a negative determination of suitability.
- (3) Positive Determination. If the Commission finds that an applicant or new qualifier or existing qualifier has met its burden of demonstrating compliance with the suitability in M.G.L. c. 23K and 205 CMR 115.00, the Commission shall issue a positive determination of suitability which may include conditions and restrictions.
- (4) The Commission shall not entertain a Phase 2 application for any applicant unless and until the Commission has issued a positive suitability determination on that applicant.
- (5) No Appeal from Commission's Determination of Suitability. Pursuant to M.L.G. c. 23K, § 17(g), the applicant or qualifier shall not be entitled to any further review.
- (6) A host community may not hold an election in accordance with M.G.L. c. 23, § 15(13) until the Commission has issued a positive determination of suitability to the applicant, in accordance with 205 CMR 115.05(3), unless the following conditions are satisfied:
 - (a) Prior to the request by the applicant for an election, in accordance with 205 CMR 124.02(1): *Request for an Election*, the governing body of the community formally approves of holding the election prior to a positive determination of suitability having been issued to the applicant by the Commission; and

115.05: continued

(b) At the expense of the applicant, prior to the election the community has conducted a process for informing the community about the Commission's determination of suitability standards and procedures, which shall include, but not be limited to, the provision of a notice designed to be received by voting households within the community informing such households that an election is to be held for which the applicant has yet to be issued a positive determination of suitability, that the Commission will make its determination of suitability after completing a thorough background investigation of the applicant, its principal operating officers and investors, and that the Commission will not permit the applicant or its principal operating officers or investors to proceed with the application unless it determines that they are suitable to operate a gaming facility in Massachusetts. The content of the notice shall be forwarded to the Commission for approval prior to dissemination. A description of other methods to so inform the community about the Commission's determination of suitability standards and procedures shall also be forwarded to the Commission prior to holding of the election. Any failure to issue the notice to one or more voting households shall not be deemed by the Commission to be a failure to meet the requirements of 205 CMR 115.05(6), provided that a community demonstrates reasonable efforts to comply with the requirements of 205 CMR 115.05(6).

REGULATORY AUTHORITY

205 CMR 115.00: M.G.L. c. 23K, §§ 4(37), 5, 12, 13, 14(i), 16, 17, 46 and 47.



AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Amended Small Business Impact Statement in accordance with G.L. c. 30A, § 5 relative to the proposed amendments to 205 CMR 115.00: Phase 1 and new qualifier suitability determination, standards, and procedures, for which a public hearing was held on August 26, 2025, at 10:30 AM EST.

This regulation was initially developed as part of the regulatory framework governing casino gaming in the Commonwealth, and is authorized by G.L. c. 23K, §§ 5 and 12 (a)(6). It is now being amended, to clarify the process for suitability proceedings for new qualifiers.

205 CMR 115.04 governs the process in determining suitability of qualifiers to operators licensed pursuant to 205 CMR 131.00 and G.L. c. 23K § 19. Accordingly, this proposed regulation is unlikely to have a negative impact on small businesses.

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

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

It is not readily apparent that this regulation would affect small businesses, as it applies to the qualifiers of entities licensed under 205 CMR 131.00. Accordingly, there are no less stringent compliance or reporting requirements for small businesses.

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

This regulation establishes the Commission’s internal processes and procedures for determining the suitability of qualifiers of gaming licensees. As such, this proposed regulation does not impose any reporting requirements for small businesses.

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

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

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

The design standards are important as they encourage uniformity and are set forth in this regulation to establish the process for suitability proceedings in accordance with G.L. c. 23K, § 12 (a)(6). The amended regulation clarifies the process for suitability proceedings for new qualifiers.

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

This regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth at this time.

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

This regulation is not likely to adversely impact small businesses.

Massachusetts Gaming Commission
By:

/s/ Autumn Birarelli
Staff Attorney
Legal Division

Dated: September 9, 2025



Division of Racing

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

FROM: Alexandra Lightbown, Director of Racing

CC: Dean Serpa, Executive Director
Justin Stempeck, Interim General Counsel

DATE: September 11, 2025

RE: Plainridge Park Casino Request to Reschedule
Cancelled Racing of June 24 and July 29, 2025

Dear Commissioners:

Steve O'Toole, Director of Racing, Plainridge Park Casino, in consultation with the Harness Horseman's Association of New England, is requesting approval to replace the cancelled race days of June 24th and July 29th by adding September 26th, with a post time of 2 pm, and November 26th, with a post time of 1 pm. June 24th and July 29th were cancelled due to excessive heat and humidity.

Recommendation: That the Commission approve the request of Plainridge Park Casino to replace the cancelled days of June 24th and July 29th with live racing on September 26th (2 pm post time) and November 26th (1 pm post time), 2025.



Massachusetts Gaming Commission

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



PLAINRIDGE PARK
CASINO

August 28, 2025

Alexandra Lightbown
Director of Racing
Massachusetts Gaming Commission
101 Federal St.
Boston, MA 02110

Dear Director Lightbown,

Plainridge Park Casino respectfully requests approval to reschedule the previously cancelled days of live racing, Tuesday, June 24th and Tuesday, July 29th due to extreme heat to be rescheduled and conducted on Friday, September 19th post time 2:00pm and Wednesday, November 26th post time 1:00pm.

Sincerely,

Steve O'Toole
Director of Racing



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

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

MEMO **MEETING**
DATE: 9/4/2025 **DATE:** 9/11/2025

RE: Commission consideration to permanently remove a soccer federation from MA Event Catalog

EXECUTIVE SUMMARY:

The Sports Wagering Division recommends permanent removal of the Chinese Football Association (“CFA”), including but not limited to, all tiers of its men’s and women’s Chinese leagues, Chinese FA Cup and the Chinese National Team.

REGULATION BACKGROUND:

Per 247.03(8), “The Commission may grant, deny, limit, restrict, or condition a request made pursuant to this rule, and may revoke, suspend, or modify any approval granted under this rule.”

Additionally, per 247.03(12), the Commission may use any information it considers appropriate, including to but not limited to, information received from a sports governing body, in determining whether to authorize or prohibit wagering on a particular sporting event or wager category.

Lastly, pursuant to 247.04(8), the Commission, on its own authority, may limit, restrict, or exclude a certain type, form, or category of sports wagering on its own initiative, without a request pursuant to 247.04(1).



Sports Wagering Division

DISCUSSION:

On September 12, 2024, the Commission suspended all wagering on the CFA, including all tiers of men's and women's Chinese leagues and the Chinese FA Cup, pending the outcome of an independent investigation by the integrity monitoring group IC360. See Attachment A for previous memorandum provided to the Commission.

On May 27, 2025, IC360 concluded its investigation into the CFA. While the investigation did not uncover additional incidents beyond the previously reported cases, it did confirm widespread integrity concerns within the league. Specifically, it verified the systemic issues, such as bribery and match-fixing, involving personnel at all levels of the league, including high-ranking officials.

In alignment with the Sports Wagering Division's memo presented on September 12, 2024, we are referring this matter back to the Commission for a final determination on the permanent removal of all wagering on the CFA from the Commission's approved Event Catalog. This includes, but is not limited to, all tiers of its men's and women's Chinese leagues, Chinese FA Cup and the Chinese National Team.

CONCLUDING STATEMENT:

The Sports Wagering Division recommends the permanent removal of all wagering on the Chinese Football Association (CFA), including all tiers of the men's and women's Chinese league, the Chinese FA Cup and the Chinese National team.



Sports Wagering Division

Attachment A



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

FROM: Andrew Steffen – Sports Wagering Operations Manager

MEMO **MEETING**

DATE: 9/11/2024 **DATE:** 9/12/24

RE: Commission Consideration to Suspend Wagering on a Soccer Federation in the MA Event Catalog

EXECUTIVE SUMMARY:

The Sports Wagering Division received an integrity monitoring alert identifying match-fixing within the Chinese Football Association (CFA). The reported infractions revealed manipulation across the top three divisions of the men's leagues, the Chinese FA Cup, and the top division of the women's league.

REGULATION BACKGROUND:

Per 247.03(8), "The Commission may grant, deny, limit, restrict, or condition a request made pursuant to this rule, and may revoke, suspend, or modify any approval granted under this rule."

Additionally, per 247.03(12), the Commission may use any information it considers appropriate, including to but not limited to, information received from a sports governing body, in determining whether to authorize or prohibit wagering on a particular sporting event or wager category.

Lastly, pursuant to 247.04(8), the Commission, on its own authority, may limit, restrict, or exclude a certain type, form, or category of sports wagering on its own initiative, without a request pursuant to 247.04(1).

DISCUSSION:



Sports Wagering Division

The MA Event Catalog currently allows, and has allowed since the launch of sports wagering and the initial event catalog in 2023, sports wagering operators the opportunity to offer the Fédération Internationale de Football Association (FIFA) for wagering as an approved soccer governing body. The CFA falls within the Asian Football Conference (AFC) of FIFA and is the governing body that oversees the Chinese national team, the Chinese FA Cup, as well as the four professional tiers of Chinese soccer for the men and women.

On Tuesday, September 10, the MGC Sports Wagering Division received an alert from US Integrity regarding bans and suspensions for players and officials for match-fixing. The alert revealed at least 120 matches have been fixed involving 41 teams.

The bans come after a two-year investigation into match-fixing and gambling within the top tiers of Chinese soccer. ^[1] US Integrity further stated this investigation is ongoing and may have additional updates in the weeks ahead.

Also related to this investigation, last month, the former Vice President of the CFA, Li Yuyi, received an 11-year prison sentence and was fined ¥1 million yuan for his involvement in taking bribes. This comes after Li pleaded guilty in March to using his position to accumulate money and gifts worth over \$1.7 million between 2004 and 2021. ^[2]

Lastly, the former CFA Chairman, Chen Xuyuan, was sentenced this past March to life in prison for accepting more than \$10 million in bribes. ^[3]

Sport	Governing Body	League
Soccer	International Federation of Association Football (FIFA)	International and domestic events sanctioned by FIFA or FIFA member federations.
	International Champions Cup	International Champions Cup
	NCAA	NCAA

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¹ Per Reuters article dated 9/10/24 : <https://www.reuters.com/sports/soccer/china-bans-43-soccer-players-officials-life-match-fixing-2024-09-10/>

² Per The Standard article dated 8/20/24: <https://www.thestandard.com.hk/section-news/section/4/265474/11-year-jail-term-huge-fine-for-ex-CFA-executive-in-bribery-scandal>

³ Per Reuters article dated 3/26/24: <https://www.reuters.com/sports/soccer/ex-head-china-football-association-sentenced-life-prison-state-media-report-2024-03-26/>



Sports Wagering Division

CONCLUDING STATEMENT:

The Sports Wagering Division recommends the suspension of all wagering on the Chinese Football Association (CFA), including all tiers of the men's and women's Chinese league and the Chinese FA Cup until further investigation is completed.



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

FROM: Joseph E. Delaney, Chief of Community Affairs

CC: Dean Serpa, Executive Director, Justin Stempeck, Interim General Counsel

DATE: August 8, 2025

RE: FY 2027 Community Mitigation Fund Policy Questions

As we do each year, the Community Affairs Division keeps track of issues associated with the Community Mitigation Fund (CMF) and brings them to the Local Community Mitigation Advisory Committees (LCMACs) and the Commission for discussion and comment.

Given the circumstances regarding funding for the last two years, FY 2027 brings a whole host of new challenges for the continued implementation of the program. Based on the awards made in FY 2026, it appears that there will be approximately \$5.9 million available for FY 2027. We will be working with the Finance Division to finalize the exact number.

For FY 2026, the Commission originally estimated that the expenditures would total about \$19.5 million. This was based on the Block Grant formula for Communities, the limits placed on Regional Agency Grants, and historic grant applications. The \$5.9 million available for FY 2027 would be 30% of that total. So clearly, there will need to be major reductions to all grants based on these facts.

The key considerations this year are all based around how to best distribute the remaining funds.

Should the Commission change the allocation of funds between Region A, Region B and the Category 2 communities?

The following was the allocation formula for FY 2026 broken down by Region:

Region A – 66.41% of Total Allocation as follows:

Municipal Block Grants	\$11,500,000
Regional Agency Grants	<u>\$ 1,450,000</u>
Total	\$12,950,000



Massachusetts Gaming Commission

Region B – 29.74% of Total Allocation as follows:

Municipal Block Grants	\$ 4,300,000
Regional Agency Grants	<u>\$ 1,500,000</u>
Total	\$ 5,800,000

Category 2 – 3.85% of Total Allocation as follows:

Municipal Block Grants	\$ 500,000
Regional Agency Grants	<u>\$ 250,000</u>
Total	\$ 750,000

Grand Total \$19,500,000

If the same percentages were used for FY 2027, the available grant amounts would be:

Region A – 66.41% of Allocation	\$ 3,918,190
Region B – 29.74% of Allocation	\$ 1,754,660
Category 2 – 3.85% of Allocation	<u>\$ 227,150</u>
Grand Total	\$ 5,900,000

Historically, the funds generated by the casinos remained in their regions with surplus funds used to fund the regional agency grants. Technically, all of the remaining funds were generated in Region A.

Should the Commission make any changes to community eligibility?

Over the years, the Commission has established eligibility for the CMF as designated Host and Surrounding Communities, communities that are adjacent to a Host Community, and communities that petitioned to be a Surrounding Community, but were denied that status. These were the communities that were deemed eligible in the FY 2026 Municipal Block Grant Guidelines.

In developing the funding formula, one of the basic tenets was that the further a community was from a casino, the smaller the impacts. The Commission could consider whether all of these communities should continue to be eligible for funding. The Commission could consider limiting eligibility to some of those communities to help preserve more funds for the communities more directly impacted by the casinos.



Massachusetts Gaming Commission

Should the Commission continue to fund Category 2 communities?

The Plainridge Park Casino (PPC) does not contribute any funds towards the CMF. The only CMF funding from PPC came from its original application fee and totaled \$1,625,000. The CMF has provided well in excess of that amount of funding over the last 10 years to the Category 2 communities.

Should the Commission continue to fund Regional Agency grants?

MGL 23k Section 61 identifies “local and regional education, transportation, infrastructure, housing, environmental issues and public safety, including the office of the county district attorney, police, fire and emergency services” as eligible entities to receive CMF grants.

The Commission could consider reducing or eliminating some of these grant programs to help supplement funding for communities that are more directly impacted by the casinos, or to help preserve higher levels of funding for the regional programs that the Commission considers to be higher priority.

The following are the current grants that we have issued to Regional Agencies:

- **Workforce Development Grants** – One grant in Region A and one Grant in Region B with a maximum grant amount of \$750,000. These have gone to MassHire in Region A and HCC/STCC/Springfield Public Schools in Region B. These started at \$200,000 per Region and have grown over the years to the current \$750,000.
- **Regional Public Safety Grants** – The current Guidelines only specify the District Attorney’s Offices and the Attorney General’s office as directly eligible for funding. DA’s are limited to \$100,000 each and the AG is based on identified need. The Guidelines also state that other public safety agencies may be eligible based on available funding and demonstrated need. In 2026, grants were awarded to the following entities:
 - Hampden County District Attorney
 - Hampden County Sheriff’s Office
 - Suffolk County District Attorney
 - Attorney General
- **Regional Planning Grants** – These grants were introduced in FY 2025 as a way to look at more regional issues that may affect multiple impacted communities. The eligible entities are MAPC, PVPC and SRPEDD, with each eligible for up to \$250,000.



Massachusetts Gaming Commission

Should the Commission modify the Financial Waiver Requirements of the Guidelines?

Considering the reduced level of funding for FY 2027, it seems unlikely that there will be any significant sources of surplus funds available for waivers. The only circumstances where waivers might be available are if a community did not apply for funds, or certain projects were not deemed eligible for funding. We are recommending changing the wording of this waiver to reflect the current reality.

Should there be any changes to the grant categories and Guidelines?

Staff is not proposing any wholesale changes to the Guidelines. We have not identified any new categories of grants and the revisions made to the Guidelines over the last couple of years have resulted in improved applications. The current grant categories are:

- Community Planning
- Transportation (planning and construction)
- Public Safety
- Gambling Harm Reduction
- Specific Impact

Should the Commission make any changes to the distribution formula? The distribution formula seemed to work well for the last two years. If the Commission were to change the eligibility for funds, the formula might also need to change.

Attachment A demonstrates what the grant amounts would look like if the Commission funded each eligible entity at 30% of the FY 2026 amounts.

Input from the Local Community Mitigation Advisory Committees.

Meetings were held with both the Region A and Region B LCMACs on August 5. Staff reviewed the policy questions with the Committees and asked for input particularly regarding how best to distribute the funds.

Region A – Several members recommended that the focus be on the communities and not so much on the Regional Agencies. It was expressed that the regional agencies generally have other sources of funding that they can tap into. The City of Everett requested that the remaining funding only go to the Host Communities as they are the most impacted by the casinos. There were also several comments that recommended keeping all of the money in Region A since these funds were generated by Encore. Other comments recommended eliminating funding for the Category 2 communities. There was some support for reducing the number of eligible communities. There was also some support expressed for maintaining the Workforce Grant.



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Region B – Several of the members opined that the focus of the funds should be on the communities and not as much on the regional agencies. However, there was strong support for the Workforce Grants in Region B. There did not seem to be any support for reducing the number of eligible communities.



Massachusetts Gaming Commission

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Attachment A

The following tables demonstrate what the impact would be on each community and regional agency if we used 30% of the previous grant allocation. This is just for illustrative purposes.

Region A FY 2027 Formula

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Saugus	\$200,000	60,000
Lynn	\$200,000	60,000
Melrose	\$200,000	60,000
Total	\$11,500,000	3,450,000

Regional Agency	FY 2026 Allocation	30% of FY 26
MassHire	\$750,000	\$225,000
Suffolk DA	\$100,000	\$30,000
Middlesex DA	\$100,000	\$30,000
AG Office	\$250,000	\$75,000
MAPC	\$250,000	\$75,000
Total	\$1,450,000	\$435,000

	FY 2026	FY 2027
Region A Total	\$12,950,000	3,885,000



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Region B FY 2027 Formula

Community	FY 2026 Allocation	30% of FY 26
Springfield	\$1,403,700	421,110
W. Springfield	\$518,300	155,490
Holyoke	\$294,000	88,200
Chicopee	\$341,100	102,330
Ludlow	\$244,900	73,470
Wilbraham	\$313,800	94,140
E. Longmeadow	\$352,000	105,600
Longmeadow	\$324,800	97,440
Agawam	\$357,400	107,220
Hampden	\$75,000	22,500
Northampton	\$75,000	22,500
Total	\$4,300,000	1,290,000

Regional Agency	FY 2026 Allocation	30% of FY 26
HCC/STCC	\$750,000	\$225,000
Hampden DA	\$100,000	\$30,000
Hampden Sheriff	\$400,000	\$120,000
PVPC	\$250,000	\$75,000
Total	\$1,500,000	\$450,000

	FY 2026	FY 2027
Region B Total	\$5,800,000	1,740,000



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Category 2 FY 2027 Formula

Community	FY 2026 Allocation	30% of FY 26
Plainville	\$153,300	45,990
Wrentham	\$76,800	23,040
Foxborough	\$64,500	19,350
Mansfield	\$63,000	18,900
N. Attleborough	\$81,700	24,510
Attleborough	\$60,700	18,210
Total	\$500,000	150,000

	FY 2026	FY 2027
Cat 2 Total	\$750,000	225,000

Regional Agency	FY 2026 Allocation	30% of FY 26
SRPEDD	\$250,000	\$75,000

	FY 2026	FY 2027
Grand Total	\$19,500,000	\$5,850,000



Massachusetts Gaming Commission



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

FROM: Joseph E. Delaney, Chief of Community Affairs

CC: Dean Serpa, Executive Director, Justin Stempeck, Interim General Counsel

DATE: September 10, 2025

RE: FY 2027 Community Mitigation Fund Policy Questions

This is a revision to the memo of September 5, 2025, and includes the most up to date estimate of the amount of money available for the FY 2027 CMF round.

Based on our discussion at the Commission Meeting on August 14, 2025, the Community Affairs Division has prepared this memo to help guide the discussion regarding the allocation of funds for the FY 2027 CMF Grant round. In the earlier discussion, the main issues were distilled down to four essential questions. While we are not asking for a direct vote on any of these questions, staff is looking for a consensus of the Commission on how to proceed with each of these items so that we may start to prepare the FY 2027 CMF Guidelines.

For reference, we are currently estimating that there will be about \$5.0 million available to distribute in FY 2027 which is approximately 25% of the amount budgeted for FY 2026. These remaining funds were generated in Region A. We have also attached the previous memo for your reference as that memo included a number of charts that show what the impact would be on the individual communities and agencies.

1. **How should the funds be distributed among the Regions?** In FY 2026, the distribution was approximately 66% to Region A, 30% to Region B and 4% to the Category 2 area. The Commission could carry these percentages forward into FY 2027, which would result in the following distributions:

Region A -	\$3,300,000
Region B -	\$1,500,000
Category 2 -	\$ 200,000

The Commission could also redistribute these funds if desired. There were several comments at the Region A LCMAC meeting that suggested all of the remaining funds



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should go to Region A since the funds were generated in that Region. One member also expressed that all of the funds should go to the Host Communities. Region B generally opined that there should be no changes to the distribution percentages.

2. **How much of the funds in each Region should go towards municipalities and how much should go towards Regional Agencies?** In FY 2025 and FY 2026, caps were placed on most of the Regional Agency grants (\$750,000 for Workforce, \$250,000 for Regional Planning, \$100,000 for DA's offices – no cap was placed on Specific Impact or the Attorney General). We do not know from year to year, exactly who will be applying for Regional Agency Grants, so the exact amount of money to be awarded is determined after the review of the grants. This results in very different percentages of the Regional allotments going toward municipalities vs. Regional Agencies. For FY 2026 the following anticipated grant amounts were used in the Guidelines:

Region A

Municipal Block Grants	\$11,500,000 (89%)
Regional Agency Grants	<u>\$ 1,450,000 (11%)</u>
Total	\$12,950,000

Region B

Municipal Block Grants	\$ 4,300,000 (74%)
Regional Agency Grants	<u>\$ 1,500,000 (26%)</u>
Total	\$ 5,800,000

Category 2

Municipal Block Grants	\$ 500,000 (67%)
Regional Agency Grants	<u>\$ 250,000 (33%)</u>
Total	\$ 750,000

Both the Region A and B LCMACs indicated that they would like to see the money be focused on municipalities, with less emphasis on the Regional Agencies. The thought was that the Regional Agencies have other sources of funding that they can rely upon, while the municipalities do not. The one exception expressed was for continued funding for workforce grants.

The Commission could utilize these same FY 2026 percentages within the Regions or could apply a standard percentage across the Regions that would provide the same focus on municipalities in each Region (e.g., 85% municipalities, 15% Regional



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Agencies in all Regions). If the percentages used in FY 2026 are carried forward, the following amounts would be available for Regional Agency Grants:

Region A	\$363,000
Region B	\$390,000
Category 2	\$ 66,000

3. **Should any changes be made to municipal eligibility?** Historically, the Commission has accepted applications from Host Communities, Surrounding Communities, any community that directly abuts a Host Community and those communities that petitioned to become a Surrounding Community. Several communities were denied Surrounding Community status or withdrew their petitions. Most of these communities are fairly distant from the casinos and are less likely to suffer from significant impact of the casinos.

The Commission could consider eliminating those communities that petitioned to become a Surrounding Community, thereby increasing the amount of funds available to the other communities. Since those communities do not currently receive significant amounts of money, the effect of eliminating them would be fairly muted.

The Region A LCMAC expressed interest in eliminating these more distant communities while the Region B LCMAC thought that eligibility should remain the same. Several Region A LCMAC members opined that all of the remaining money should go to Region A communities and one member opined that all of the funds should go only to Host Communities.

4. **Should any changes be made to Regional Agency eligibility?** In the first several years of the CMF, the only Regional Agencies that received funding were Workforce Grants, DA assistance and grants to the Hampden County Sheriff's office. In FY 2025, this eligibility was expanded to include Regional Planning Agencies and the Attorney General's office. With the necessary reductions in funding, all of these grants will be far less impactful if awarded at the same ratio as previously.

The Commission could consider eliminating some of these eligibilities if certain categories of grants were considered to be higher priority. That would allow those priority grants to maintain a higher percentage of the previous grants, thereby being



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more impactful. For example, if each of the grants awarded in FY 2026 were to only receive 25% of their previous funding, the Regional workforce grants would drop from \$750,000 to \$187,500, the Regional Planning Grants would drop from \$250,000 to \$62,500 and the Regional Public Safety Grants would drop from \$100,000 to \$25,000. If, for example, the Commission prioritized Workforce Grants and Public Safety Grants, those grants could be maintained at a higher level.

If the Commission were to carry forward the same percentage of funds used in FY 2026 for Regional Agency Grants with no changes to eligibility, a commensurate reduction would need to be made in the category caps. Staff would also recommend adding caps to the Specific Impact Grant and AG Grant so the requests do not exceed the available funds.

Both the Region A and Region B LCMACs were in general agreement that the Workforce grants should be preserved but did not believe that the other Regional Agency Grants should be carried forward since those agencies have other sources of funding.



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Massachusetts Gaming Commission



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

FROM: Joseph Delaney, Chief of Community Affairs, Mary Thurlow, Senior Program Manager

CC: Dean Serpa, Executive Director, Justin Stempeck, Acting General Counsel

DATE: September 8, 2025

RE: Boston FY 2025 Block Grant and re-use of Public Safety Grant Funds from 2022 and 2023

The City of Boston is requesting that \$3,017.35 from the 2022 Public Safety Grant and \$42,533.14 from the 2023 Public Safety Grant be transferred to the FY 2025 Block Grant to help fund a Law Enforcement Program Coordinator.

Background: In FY 2025, the City of Boston requested funding for a full-time Law Enforcement Program Coordinator to help the City coordinate its activities with Encore Boston Harbor, the City of Everett Police Department, the State Police and the Gaming Enforcement Unit. The proposed starting salary for this position was \$57,298 and fringe benefits of \$14,602 for a total cost of \$71,900. The City has not been able to fill this position due to the offered salary and has re-evaluated the position. The City is now proposing a starting salary of \$88,309 with a total cost including fringe benefits of \$110,784. The Boston Police Department has identified a candidate for this position that would accept that salary.

There are current unexpended balances of \$3,017.35 and \$42,533.14 from the City's 2022 and 2023 grants. These unexpended funds were for additional police patrols in the Sullivan Square area.

Request: Boston requests that the balance of the 2022 and 2023 funding be transferred to the FY 2025 Block Grant. This is a high priority for the Boston Police Department, and the transfer of these funds will allow them to move forward with the hiring of this position.

Recommendation: The Law Enforcement Program Coordinator position was approved by the Commission as part of the FY 2025 Block Grant. Staff agrees that this is an important position and that the transfer of these funds will allow them to move forward. These transfers will also allow us to close out the two older grants. Therefore, we recommend the request.



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