



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 24, 2026 | 10:00 a.m.

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

PHONE CONFERENCE ID: 932 218 646#

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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 - #598

1. Call to Order – Jordan Maynard, Chair
2. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
 - a. Presentation of report, "Understanding Gambling & Help-Seeking Among Veterans" – Emma Hersh, Director of Veterans Programs, Technical Assent
3. Sports Wagering Division – Carrie Torrisi, Division Chief of Sports Wagering
 - a. Updates to Bally's House Rules - Griffin Miniutti, Compliance Officer II **VOTE**
 - b. Updates to DraftKings House Rules - David Harrison, Compliance Officer II **VOTE**
 - c. Updates to Plainridge Park Casino House Rules – David Harrison, Compliance Officer II **VOTE**
 - d. MGM Springfield Request to Pay Lost Sports Wagering Ticket Pursuant to 205 CMR 238.47 – Brittany Costello, Compliance Officer II **VOTE**



Massachusetts Gaming Commission

- i. Discussion Regarding Delegation of Lost Ticket Payout Approvals to Sports Wagering Division – Andrew Steffen, Compliance and Operations Manager **VOTE**

4. Legal Division – Kevin Scanlon, General Counsel

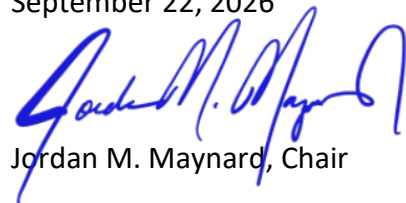
- a. 205 CMR 229.03: *Interim Authorization* - Discussion for possible Emergency Adoption, and/or Authorization to begin Promulgation – Jenna Hentoff, Deputy General Counsel; Caitlin Monahan, Director of the Investigations and Enforcement Bureau; Kathleen Kramer, Assistant Director of the Investigations and Enforcement Bureau **VOTE**
- b. 205 CMR 17.00: *Review of a Proposed Transfer of Interests in a Racing Meeting License* - Discussion and Review of Regulations and Amended Small Business Impact Statement for Final Review and Adoption, and Authorization to send the Regulations to the Clerks of the House and Senate – Judith Young Senior Associate General Counsel; Kevin Scanlon, General Counsel; Alexandra Lightbown, Director of the Division of Racing **VOTE**
- c. Request for Amendment of the Authorized Rules of Roulette - Judith Young, Senior Associate General Counsel; Jenna Hentoff, Deputy General Counsel; Burke Cain, Gaming Agents Division Chief; Dave DiOrio, Gaming Agents Division Assistant Chief; Marty Edwards, Assistant Casino Regulatory Manager, Encore Boston Harbor **VOTE**

5. Commissioner Updates

6. 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 22, 2026 | 10:00 a.m. EST

September 22, 2026



Jordan M. Maynard, Chair

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



Massachusetts Gaming Commission

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MGC Research Snapshot

Understanding Gambling & Help-Seeking Among Veterans

August 2026

What you need to know

This community-engaged qualitative study examined how gambling affects Massachusetts Veterans' well-being, trust, and help-seeking, and identified opportunities to strengthen prevention and engagement. Among study participants, gambling occurred within distinctive military and post-service contexts, related harm was often difficult to see or disclose, and management frequently relied on self-directed, relational, or indirect pathways. Participants and stakeholders also identified existing Veteran-serving infrastructure, trusted messengers, and natural touchpoints that could be better coordinated to reach Veterans. Initial solution design considerations include integrating gambling screening and support into existing systems, targeting periods of elevated risk, offering confidential, low-barrier pathways to care, and advancing peer-led, community-based, identity-responsive engagement. These considerations require further validation and testing.

What is this research about?

Research suggests military and Veteran populations experience elevated rates of problem gambling and gambling disorder compared with the general population but are not consistently screened and connected to appropriate services and supports. Little is known about gambling's effects on the financial, social, and emotional well-being of Veterans, as well as trust and willingness to engage in services. With funding from the Massachusetts Gaming Commission, this study, conducted by researchers from Technical Assent in partnership with the William Joiner Institute at the University of Massachusetts Boston, explored the effects of gambling on Veteran communities, strategies to strengthen prevention and engagement, and worked to build research capacity in Veteran-serving communities.

What did the researchers do?

Researchers from Technical Assent, in collaboration with the William Joiner Institute, created a 10-member Community Advisory Board (CAB) to help shape the research, support recruitment, and validate and interpret findings. The researchers also reviewed relevant literature and previous Massachusetts research

reports to inform the field research design. Using a human-centered design (HCD), community-based participatory research (CBPR) approach, and Technical Assent's CLIMB framework, the team conducted 43 in-depth interviews across 25 Massachusetts cities/towns, in addition to two stakeholder focus groups, to explore Veteran experiences and perceptions around gambling and service engagement. Researchers analyzed the qualitative data collected and identified key themes with ongoing input and three validation sessions with Veterans and community research partners to pressure-test findings, identify gaps, and add community context.

What did the researchers find?

Findings reflect the experiences of Veterans and stakeholders who participated in this qualitative study and should not be interpreted as representative of all Massachusetts Veterans.

Key findings included:

- **Veteran gambling:** Veterans described many of the same motivations for gambling as the general population, but military and post-service

experiences shaped the context in which those motivations occurred. Participants described military environments in which gambling could be normalized while disclosure of vulnerability was discouraged, and deployment conditions in which financial risk could feel less consequential. The transition out of service can concentrate multiple risk factors, including loss of structure, financial strain, identity disruption, and reduced social support. For some Veterans, monthly VA compensation can also act as a recurring gambling activator.

- **Gambling affects Veterans' lives:** When gambling escalated, participants described consequences ranging from depleted savings and housing instability to strained relationships and diminished self-worth. Financial harm was often more visible, while shame and concealment could make social and emotional consequences harder to recognize and recover from.
- **Pathways to manage gambling:** Veterans described self-directed, relational, formal, and indirect strategies for managing gambling, including spending limits or “fun money,” app deletion, self-exclusion, partner or peer accountability, and treatment for co-occurring conditions. Many relied primarily on self-directed and relational strategies rather than gambling-specific services, with harm reduction often occurring quietly and unevenly.
- **Bridges already exist:** Participants and stakeholders described Massachusetts Veterans as under-reached rather than inherently hard to reach. Existing Veteran-serving infrastructure, trusted messengers, and natural touchpoints create opportunities for engagement, but greater coordination, intentional outreach, and Veteran-centered delivery are needed.

Conclusions and Recommendations

Findings highlight the value of integrating gambling screening, awareness, and support into existing Veteran systems and holistic care services, while also offering confidential, low-barrier pathways to care. Additionally, findings suggest leveraging known elevated risk moments and transition periods for targeted outreach and prevention efforts, as well as

About the researchers

Taylor Goulbourne, Emma Hersh, and Suzanne Atchison are with Technical Assent, LLC. This research project was supported through collaboration with UMass Boston's William Joiner Institute and a Community Advisory Board. For more information about this study, please contact Emma Hersh at EHersh@technicalassent.com.

examine current prevention initiatives and services in advancing peer-led, community-based, and identity-responsive programming. Future efforts should examine current prevention initiatives and services in the context of military and Veterans. The next phase of this research project will include validating and prioritizing these solution design considerations, co-designing and testing potential solutions, piloting selected concepts, and developing community-validated recommendations and implementation guidance.

Citation

Goulbourne, T., Hersh, E., & Atchison, S. (2026). *Understanding gambling & help-seeking among veterans*. Arlington, VA: Technical Assent, LLC.

Key Words

Veterans; Community Engaged Research

Acknowledgments

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

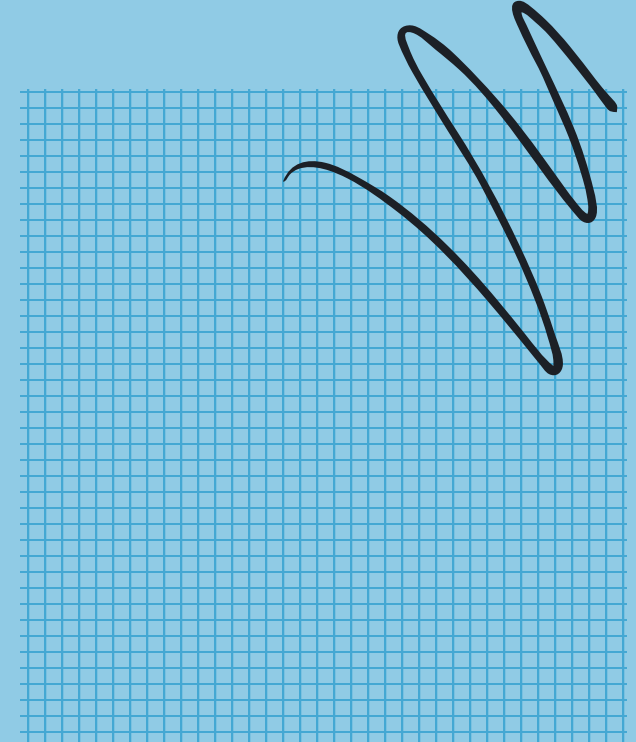


Massachusetts Gaming Commission

Understanding Gambling & Help-Seeking Among Veterans

August 3, 2026

Final Report, Version 2



Taylor Goulbourne, PhD
Emma Hersh, MPA
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Technical Assent, LLC



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Executive Summary

This report is organized in four parts. **Study Overview & Methods** describes why this research was conducted and how it was designed. **Findings** presents what Veterans and Veteran-serving stakeholders told us, organized around four themes. **Discussion** translates those findings—together with input from stakeholder focus groups and the research literature—into Insights and Solution Design Considerations. The **Appendix** provides supporting methodological, ethical, and participant detail.

Study Overview & Methods

Massachusetts and national research suggest that Veterans and military populations face elevated rates of problem gambling and gambling disorder compared with the general population (Freeman et al., 2020; Department of Veterans Affairs, 2025). Yet gambling problems remain inconsistently recognized and screened for in military and Veteran-serving healthcare settings, and specialized treatment options remain limited (Etuk et al., 2020; Vana et al., 2025). Prior research has documented elevated gambling risk and begun identifying barriers to recognition, help-seeking, and treatment, but has focused primarily on prevalence, clinical correlates, comorbidities, and treatment. Less is known about how gambling affects Veterans' financial, social, and emotional well-being, how identity factors shape vulnerability, resilience, and trust in services, and what strategies can foster that trust and support sustainable engagement within Veteran-serving communities (Levy & Tracy, 2018; Etuk et al., 2020; Vana et al., 2025). This study was designed to help address those gaps by examining how gambling affects Veterans' well-being, how identity shapes vulnerability and trust, and what strategies can strengthen prevention, engagement, and research capacity in Veteran-serving communities.

What we set out to do

- Examine how gambling affects Veterans' financial, social, and emotional well-being
- Explore how identity factors shape vulnerability, resilience, and trust in services
- Identify prevention and mitigation strategies that foster trust and engagement
- Build sustainable research and design capacity within Veteran-serving communities

Note: This report summarizes activities during Phase I of a multi-phase project; some objectives have been partially met and will be completed in future phases.

How we did it

- Review of Massachusetts Gaming Commission (MGC) funded reports, Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) findings, and other relevant literature to inform field research design
- 43 in-depth interviews with Veterans residing across 25 Massachusetts cities and towns, plus two stakeholder focus groups
- Community-engaged design using community-based participatory research (CBPR), human-centered design (HCD), and Technical Assent's CLIMB framework
- Academic partnership with UMass Boston's William Joiner Institute, a nationally recognized center in the Massachusetts Veteran community
- 10-member Community Advisory Board (CAB) spanning clinical, public health, policy, Veteran service, and academic sectors
- Three structured validation sessions with Veterans and CAB members

Summary of Key Findings

Across 43 interviews and two focus groups, four themes emerged that together explain why gambling-related harm among Massachusetts Veterans often goes unaddressed and what it will take to change that. The following findings reflect the varied experiences of study participants, not all Veterans.

Note Throughout this report, we added brackets [] and ellipses (...) to quotes for readability and clarity. They do not alter the original meaning. Quotes on this page are from Veterans.

1. Veteran Gambling Occurs in a Different Context than the General Population.

Veterans gamble for many of the same reasons as the general population. What emerged as distinctive is the context in which those motivations occur: a military culture that normalizes gambling and discourages disclosing vulnerabilities, deployment conditions that make financial risk feel low-stakes, a transition out of service that concentrates many risk factors, and—for some Veterans—a monthly VA compensation cycle that can activate gambling on a recurring basis.

“[When I'm deployed,] I'm always going to have a house. I'm always going to have food. So, it was easier to...continue gambling and maybe increase the betting. More risk; more gain.

2. Gambling Affects Veterans' Lives in a Less Visible Way.

When gambling escalates, the consequences range from depleted savings and housing instability to strained relationships and diminished self-worth. Veterans described the financial toll as often the most visible sign of harm, but the associated shame and concealment mean the social and emotional toll is frequently harder to see—and harder to recover from.

“There's a lot of shame involved... the loss of income, the loss of self-esteem, the loss of motivation, the manipulation.

3. Veterans Use Self-Directed, Relational, and Indirect Pathways to Manage Gambling.

Many Veterans have developed their own guardrails—spending caps, app deletion, self-exclusion, peer accountability—and for this group, gambling's impact is limited. For others, harm reduction happens quietly and unevenly, often through treatment for co-occurring conditions rather than gambling-specific care.

“To me, the opposite of addiction is connection. Now when I have an addictive thought, I've got a sponsor. I've got a place to go to make a telephone call to somebody that's 'gonna listen to me and give me good advice.

4. Bridges Already Exist to Reach Massachusetts Veterans, but Coordination is Needed.

Participants and stakeholders described Veterans as not a hard-to-reach population, but an under-reached one. The infrastructure, trusted messengers, and natural touchpoints already exist. What's missing is coordination, outreach, and a delivery model built around how Veterans engage rather than how institutions expect them to.

“I know when I'm not doing well, whether that's financially or mentally or whatever it may be, it's a lot easier to admit that if a person asks me than for me to go and ask for that help myself.

Insights & Solution Design Considerations



Each insight is grounded in what Veterans, practitioners, and the literature tell us about where the broader support ecosystem is falling short, and each design consideration points to a concrete, achievable next step for consideration.

Insight	Solution Design Considerations
Gambling-related harm among Veterans often goes undetected, but existing systems are well positioned to change that. Most participants had never been asked about gambling by VA providers, VSOs, or other Veteran-serving professionals, even when they regularly interacted with these systems.*	Integrate gambling screening into VA appointments, primary care visits, and touchpoints with community organizations (e.g., VSOs and nonprofits), and equip those systems to recognize and respond to gambling-related harm.
Veterans facing gambling-related harm need confidential, low-risk pathways to disclose and seek help. Military norms of self-reliance and emotional suppression, compounded by shame and professional or financial risk, can make disclosure and help-seeking feel unsafe.	Offer confidential, low-barrier pathways to care that prioritize psychological safety and reduce immediate career or security-clearance repercussions.
The service member-to-Veteran journey creates predictable windows of gambling risk and opportunities to intervene. From barracks card games to deployment earnings and monthly VA compensation, participants described recurring moments of elevated gambling risk.	Target outreach and prevention at the moments of highest risk, including during service, at transition, and near VA compensation disbursements.
Gambling often functions as a response to underlying distress—care for co-occurring conditions can help manage it. Participants frequently described gambling as a way to cope with emotional pain, mental health conditions, substance use, or financial distress.	Embed support into mental health, substance use, and financial counseling pathways so holistic care plans account for gambling-related harm as an expression of broader psychological or financial distress.
Credible engagement depends on identity-responsive, peer-led, and community-engaged outreach. Veterans were more likely to engage through trusted peers, credible community organizations, and programs that reflected their identities and experiences.	Invest in peer-led, community-based programming and harm-reduction messaging delivered by trusted messengers, designed to reflect Veterans' diversity and provide transparent, no-fee, safe, and inclusive pathways to engagement.

**A pilot study in VA primary care behavioral health identified potential gaps in the routine recognition and screening of gambling disorder (Kraus et al., 2020).*

Summary of Next Steps (Phase II)

Phase II will translate the Phase I findings into community-validated recommendations, tested solution concepts, and practical implementation guidance.

IMAGINE

Community Validation, Recommendation Development & Solution Co-Design

- Validate and prioritize the five Phase I solution design considerations
- Co-design potential solutions with Veterans and community partners
- Develop the initial community-validated report of recommendations

MAKE

Prototyping & Testing

- Develop and test up to two medium-fidelity prototypes
- Assess clarity, cultural relevance, trustworthiness, usability, and feasibility
- Refine selected concepts for pilot implementation

BRIDGE

Pilot Implementation & Evaluation

- Pilot and evaluate at least one prototype with up to two partner organizations
- Refine the solution and supporting implementation materials
- Finalize recommendations and implementation guidance
- Disseminate findings and co-developed resources

Phase II Outputs

1. Community-validated report of recommendations
2. Up to two tested prototypes
3. Pilot findings
4. Implementation, sustainability, and knowledge transfer guidance



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Study Background & Methods

Why This Study

Gambling has become increasingly accessible in Massachusetts, particularly following the introduction of retail and mobile sports wagering in 2023 (Massachusetts Gaming Commission, 2023), and gambling-related harm affects a meaningful subset of Massachusetts Veterans (Freeman et al., 2020). Yet gambling-related concerns remain underrecognized within systems designed to support Veterans: screening is inconsistent, awareness of gambling-specific services is limited, and military-cultural and institutional barriers can inhibit disclosure and help-seeking (Kraus et al., 2020; Vana et al., 2025). This study was designed to address this gap. Pre-study context:

- Veterans carry a disproportionate burden of gambling-related harm, yet it is often overlooked in Veteran-serving communities across Massachusetts (Freeman et al., 2020; Etuk et al., 2020)
- Existing MGC-funded research has established that the problem is real and measurable, but has focused primarily on prevalence and quantitative data-gathering
- The drivers of gambling behavior, what gets in the way of seeking help, and what kinds of support Veterans would trust and use remain largely unknown

This study brings together the voices of 43 Massachusetts Veterans, 10 Veteran-serving stakeholders, and a 10-member Community Advisory Board to fill that gap.

Veterans in Massachusetts Carry a Disproportionate Burden of Gambling-Related Harm

What existing research tells us

- In a Massachusetts population study, Veterans represented 20.6% of respondents classified as problem gamblers but make up approximately 3.7% of the total population in the Commonwealth (Freeman et al., 2020; Commonwealth of Massachusetts, Office of the Veteran Advocate, 2025).
- National estimates suggest approximately 8% of the U.S. Veteran and military populations experience problem gambling and 2% experience lifetime gambling disorder, compared with 1.4% problematic gambling and 0.4%–1.0% lifetime gambling disorder among adults overall (Department of Veterans Affairs, 2025).
- Active-duty service members had more than twice the adjusted odds of elevated gambling severity compared with civilians (Kraus et al., 2023).
- More than 40% of Veterans receiving inpatient treatment for gambling disorder reported a prior suicide attempt (Valle Frias et al., 2026).
- At-risk or problem gambling among Veterans is associated with PTSD, depression, substance use, trauma, and homelessness, with risk further shaped by post-deployment adjustment, stressful life events, and low social support (Department of Veterans Affairs, 2025).

What existing research has not yet fully captured

- **Lived Experience:** Qualitative research has begun to examine gambling trajectories and treatment barriers among U.S. Veterans and service members, but day-to-day experiences outside clinical and treatment contexts remain underexplored.
- **Veteran Diversity:** Studies have examined demographic and service-related differences in gambling risk, but there has not been significant research that explores how intersecting identities, service histories, and geography shape gambling experiences and help-seeking.
- **Behavioral Drivers:** While military cultural norms and stigma have been identified as barriers to help-seeking (Vana et al., 2025), how institutional trust shapes both gambling behavior and community-level engagement with services remains insufficiently understood in the U.S. context.

Research Aims

Four aims guided our multi-phase effort. Phase I, summarized in this report, focused on qualitative research, interpretation, and initial solution design considerations. Phase II will validate and prioritize those opportunities through co-design, prototyping, and pilot testing.

Aim 1. Well-being

Examine how gambling affects Massachusetts Veterans' financial, social, and emotional well-being, as well as their engagement with community supports

Aim 2. Identity factors

Explore how identity factors—age, race/ethnicity, LGBTQ+ identity, and military service history—influence Veterans' vulnerability, resilience, and trust in services

Aim 3. Fostering trust and engagement*

Identify prevention and mitigation strategies that foster trust and engagement across Veteran communities

Aim 4. Sustainable research and design*

Build sustainable research and design capacity within Veteran-serving communities to support ongoing action

A Note About Terminology

For the purposes of this study, **Veteran** is defined as any individual with prior service in the U.S. Armed Forces, including active duty, National Guard, or Reserve service. This definition includes individuals regardless of branch, length of service, deployment experience, or discharge characterization. Current service members were not eligible to participate. **Gambling** refers to participation ranging from recreational to harmful. **Gambling-related harm** refers to participant-reported financial, relational, emotional, housing, or other adverse consequences. **Problem gambling** is used only for screening results, prior research, formal services, or participant self-description. The study did not diagnose gambling disorder.

**This report covers Phase I. Research Aims 3 and 4 were initiated through community validation, interpretation, and capacity-building activities. These will be advanced further in Phase II through opportunity prioritization, co-design, prototyping, pilot implementation, and evaluation.*

Community-Engaged Research Using a Blend of Frameworks

This study leverages three complementary frameworks, each reinforcing the others to ensure the research is rigorous, community-grounded, and actionable.

- **Community-Based Participatory Research (CBPR):** Veterans and those who serve them were active partners in shaping and implementing the research.
- **Human-Centered Design (HCD):** Every activity centered Veterans' lived experiences—their needs, barriers, behaviors, and support preferences—and translated those findings into initial solution design considerations for further validation and testing.
- **CLIMB Model:** Technical Assent's five-phase framework (Clarify, Learn, Imagine, Make, Bridge) will move the work from community insight to tangible impact.*

Together, these frameworks kept Massachusetts Veterans at the center of the work, shaping how we asked questions, interpreted findings, and considered their practical use.



**This research phase applied the CLIMB Model's Clarify and Learn stages; future work will tackle the Imagine, Make, and Bridge phases.*

How HCD Shaped This Study

Human-centered design shaped how this study used qualitative research methods. Phase I centered on Veterans’ lived experiences, examined needs, barriers, behaviors, and support preferences in context. It also translated the findings into initial solution design considerations. The study was intended to identify evidence-informed opportunities for future action—framed as solution design considerations—not to estimate prevalence, establish causality, or demonstrate that proposed interventions will be effective. Those opportunities will require further validation, co-design, prototyping, and testing in Phase II.

Phase I: Qualitative Research & Interpretation	Phase II: Co-Design, Prototyping & Testing
Understand how participants experienced gambling, well-being, identity, trust, and help-seeking	Validate and prioritize the Phase I opportunity areas with Veterans and community partners
Identify recurring patterns, contrasting experiences, substantively important accounts, and areas where evidence was limited	Translate priority opportunities into specific tools, services, messages, workflows, or other solution concepts
Examine unmet needs, barriers, protective strategies, and support preferences in context	Co-design and test concepts with the people expected to use, deliver, or support them
Translate findings into initial solution design considerations and implementation questions	Refine selected concepts through usability, feasibility, acceptability, and cultural-relevance testing
Generate evidence about participants’ experiences and potential directions for action	Pilot selected concepts and gather early implementation evidence

How to Interpret the Current Findings

The findings in this report describe how study participants experienced and understood gambling-related issues. They should not be interpreted as estimates of how frequently those experiences occur among Massachusetts Veterans. The design considerations that emerged from Phase I are therefore best understood as evidence-informed directions for further validation, development, and testing, not as finalized or proven interventions.

A Community-Built Study Designed for Sustained Impact

Members of the Massachusetts Veteran and Veteran-serving stakeholder communities helped shape the research, validate findings, and build capacity for future community-led work. The following slide details how community partners contributed across the research process.*

Academic Partnership

Technical Assent partnered with UMass Boston's William Joiner Institute for the Study of War and Social Consequences (WJI), a nationally recognized center with deep roots in the Massachusetts Veteran community. WJI provided executive and PhD-level advisory support, graduate and undergraduate Veteran research assistants, and trusted community connections.



**Reference the Appendix for additional details on the training and coaching provided to the WJI Research Assistants and CAB. Also in the Appendix is the full roster of our Academic Partners and CAB members.*

Community Advisory Board

The Community Advisory Board (CAB) guided the study throughout, helping refine the research design, support recruitment, validate findings, and apply clinical, public health, policy, Veteran-service, community, and academic knowledge to the interpretation of findings and development of initial insights and solution design considerations.

For many CAB members, this was their first introduction to CBPR and HCD.

Capacity for What Comes Next

The study strengthened local capacity by training WJI Veteran research assistants in community-based participatory research and human-centered design, then partnering with them across data gathering, analysis, and synthesis.

Ongoing mentorship helped assistants build confidence applying qualitative methods in real-world settings, while validation sessions with the WJI team and CAB members pressure-tested findings, surfaced gaps, and added community nuance.

Phase II

The second phase will build on the Phase I foundation by co-designing community-owned interventions with Veterans, WJI, CAB members, and Veteran-serving organizations to create interventions grounded in context and built to last.

Community Participation Across the Research Process

Community partners contributed throughout the study, with roles ranging from consultation and review to direct participation in recruitment, data collection, interpretation, and validation.

Research Stage	Community Role	Decision-Making Contribution	Result
Study Design	WJI and CAB members reviewed research priorities and proposed methods	Advised question framing, cultural relevance, and feasibility	Refined protocol and discussion guides
Recruitment	CAB, WJI, VSOs, and partners supported outreach	Identified trusted channels and community settings	Broader community-based recruitment
Data Collection	WJI supported interviews with observation and note-taking	Added cultural context and Veteran-informed facilitation	More culturally-responsive data collection
Analysis	WJI participated in codebook development, coding, and synthesis sessions, while stakeholder perspectives from the focus groups and CAB informed interpretation of emerging themes and system-level barriers	Identified gaps, challenged assumptions, and connected participant experiences to service-system context	Refined and qualified findings and informed the initial insights and solution design considerations
Validation	WJI and CAB members participated in structured validation sessions to review insights, emerging themes, and proposed solution design considerations	Confirmed, challenged, and contextualized findings using lived experience and knowledge of Veteran-serving systems	Pressure-tested final themes and strengthened the relevance of solution design considerations

Research Methods

The study combined purposive recruitment, semi-structured qualitative data collection, ongoing assessment of informational sufficiency, and structured thematic analysis to examine Veterans' experiences with gambling and help-seeking.

Recruitment

The research team recruited Veterans through partnerships with the William Joiner Institute, Community Advisory Board members, Veteran Service Officers, Veteran-serving organizations, and state and community partners (including the Massachusetts Lottery), as well as digital outreach and distribution of study flyers. Interested individuals completed an eligibility screening survey through a study link or QR code.

Data Collection

The research team collected data between January and April 2026. They used Institutional Review Board (IRB) approved semi-structured guides for all interviews and focus groups. All sessions were audio-recorded with participant consent and transcribed for analysis.

Informational Sufficiency

The research team reviewed emerging findings throughout data collection to monitor theme saturation. Interviews concluded after the research team achieved thematic saturation (i.e., no materially relevant new themes emerged to expand the findings relevant to the research aims).

Analysis and Interpretation

The research team used a structured thematic analysis process that included transcript review and de-identification, codebook development and calibration, comparative analysis across Veteran interviews and stakeholder focus groups, analytic debriefs, and structured validation with Veterans and community research partners. The team distinguished recurring patterns from mixed, limited, or illustrative evidence and retained contradictory cases that qualified emerging interpretations.

**See the Appendix, "Human Subjects Protections," for the BRANY SBIR IRB exemption determination and procedures for consent, confidentiality, data security, and participant-risk response. See also "Qualitative Analysis & Interpretation" and "Treatment & Analysis of Identity Factors," for additional detail on coding, saturation, evidence strength, validation, and subgroup interpretation.*

In-Depth Veteran Interviews and Stakeholder Focus Groups

This study used purposive, nonprobability sampling to engage Massachusetts Veterans and Veteran-serving stakeholders through both formative and in-depth interviews* and focus groups. Recruitment sought a range of gambling experiences, military and post-service contexts, identities, and geographic perspectives rather than a statistically representative sample.



Formative Interviews

Before data collection began, Technical Assent conducted key informant interviews with Community Advisory Board members to refine the research design, discussion guides, eligibility criteria, and recruitment strategy.

**See Appendix, “Veteran Recruitment Dispositions,” for the number of completed interviews, nonresponses, withdrawals, no-shows, and other recorded recruitment outcomes.*



In-Depth Interviews

The research team conducted virtual and in-person semi-structured interviews with 43 Massachusetts Veterans. Interviews explored gambling experiences; military and post-service context; financial, social, and emotional well-being; identity; help-seeking; protective strategies; and support preferences.

Eligible participants were Massachusetts residents with prior U.S. military service who reported gambling within the prior 12 months. Participants received a \$50 gift card. All eligible individuals were invited to participate.

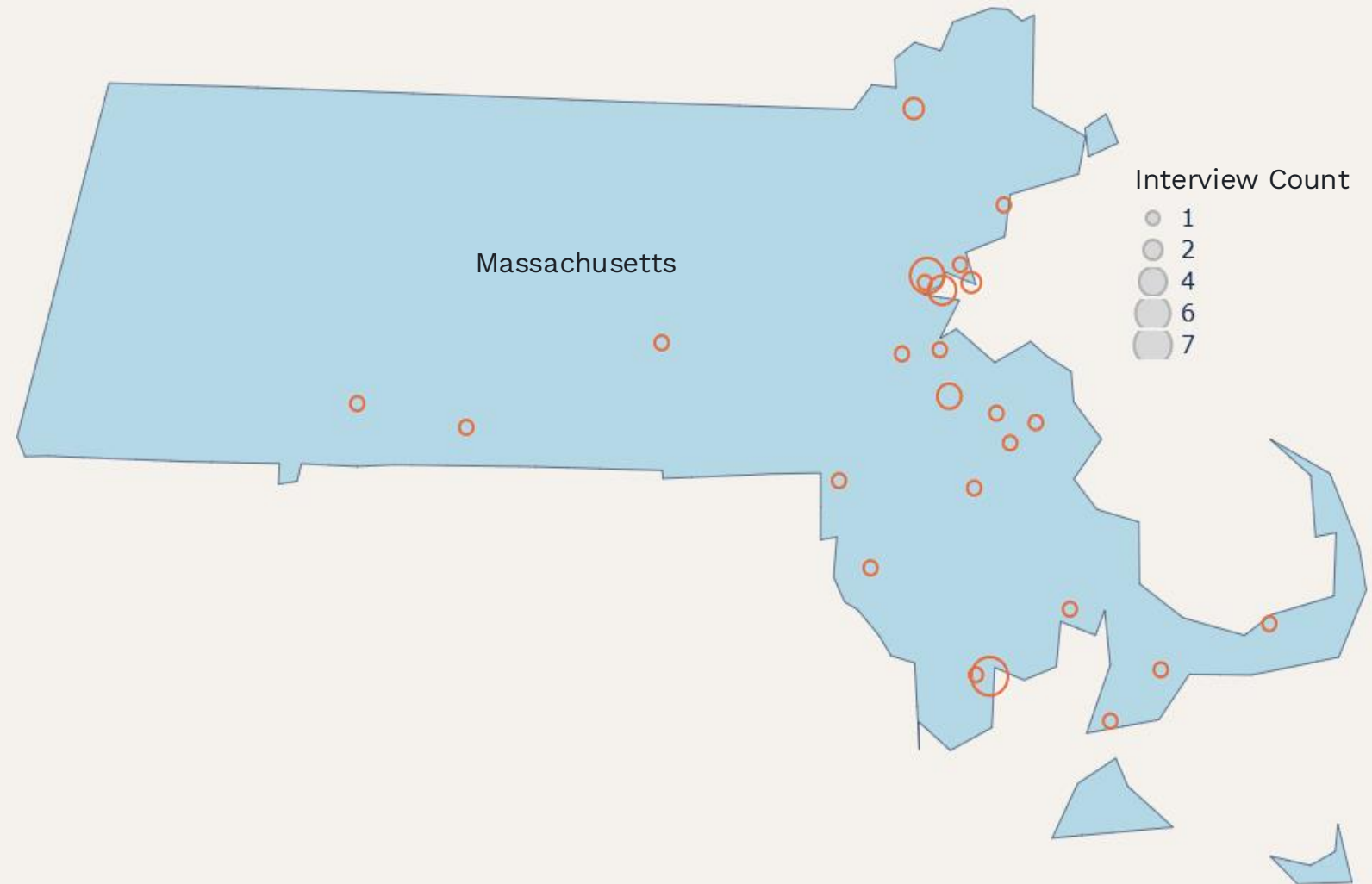


Focus Groups

Technical Assent conducted two virtual focus groups with 10 Veteran-serving stakeholders from across Massachusetts. The focus groups explored shared themes, contrasting perspectives, community dynamics, service barriers, and opportunities to strengthen prevention and support.

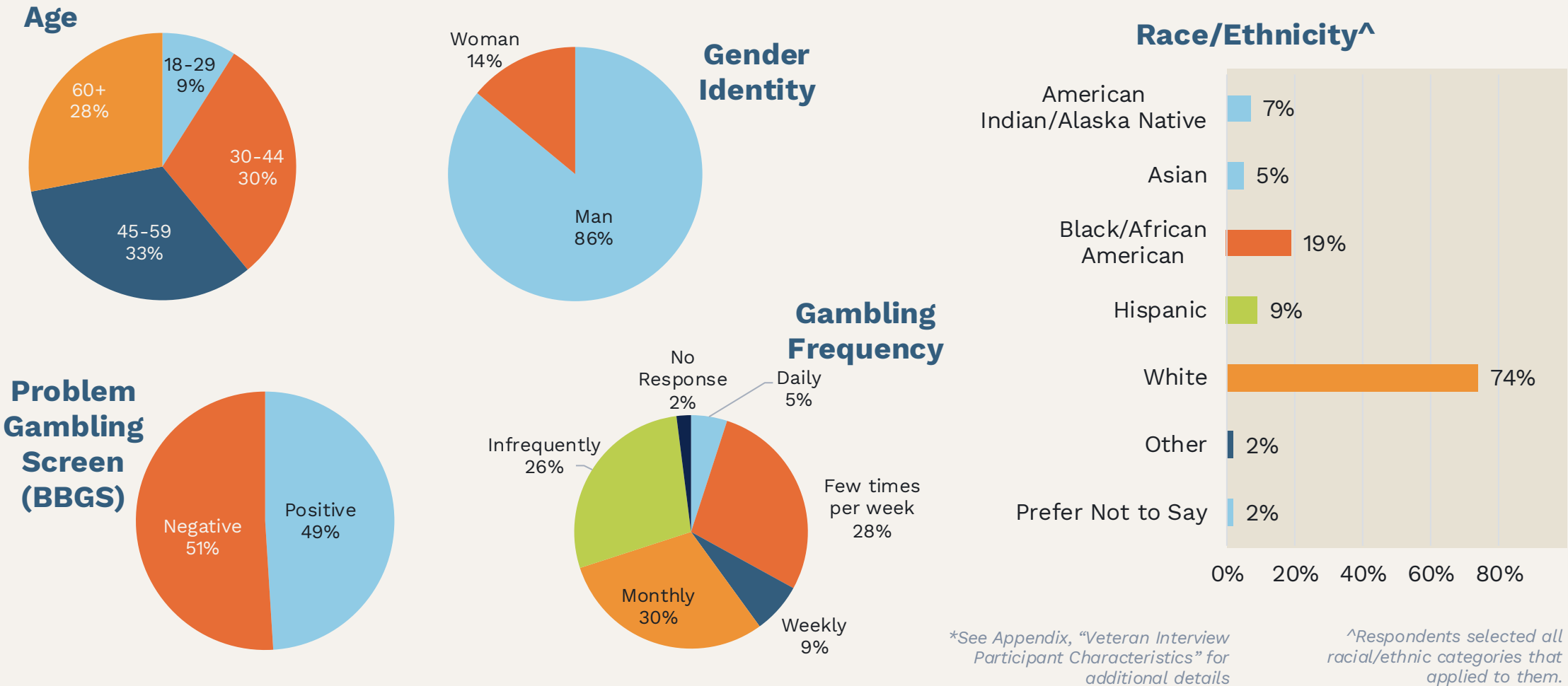
Geographic Reach of Interview Participants

Interviewees represented 25 towns and cities across Massachusetts, incorporating perspectives from Greater Boston, the South Shore, the South Coast, Cape Cod, Central Massachusetts, and Western Massachusetts. Participants came from urban, suburban, coastal, and less densely populated communities, although the study did not formally classify or compare findings by rurality. The study was not designed to produce regionally representative findings, but its geographic breadth included participants from communities with differing levels of service access, transportation, community resources, and gambling exposure.



Engaging a Diverse Range of Veterans

This study engaged 43 Massachusetts Veterans through in-depth individual interviews. We recruited participants from across the state, representing a diverse range of military backgrounds, demographics, life experiences, and relationships with gambling.*



Engaging Veteran-Serving Stakeholders

This study also engaged 10 Veteran-serving stakeholders through two focus groups to surface shared themes, differences, and community dynamics.

5

Municipal Government-Employed Veteran Service Officers (VSO)

Representing communities across
Eastern, Western, and Southeastern
Massachusetts

3

Clinicians

Psychologists and clinical social workers
with expertise in Veteran mental health

2

Other Veteran-serving Professionals

Clinical program manager and university-
based Veteran services director

Strengths of the Study

- This is the **first qualitative study** of its kind in Massachusetts to focus specifically on how gambling affects Veterans' well-being, help-seeking, and engagement with support services.
- The study **fills an important gap** in existing MGC-funded research by adding qualitative insight to prior work focused primarily on prevalence, quantitative screening, and sports wagering.
- The **community-engaged research design** strengthened the cultural relevance, validity, and interpretability of the findings by incorporating Veteran voices throughout the study.
- The **partnership** with the William Joiner Institute and the Community Advisory Board grounded the research in the lived experiences of Massachusetts Veterans and the perspectives of those who serve them.
- The study included **participants with varied military backgrounds**, ages, racial and ethnic identities, socioeconomic circumstances, gambling experiences, and geographic locations across Massachusetts.
- Structured **validation sessions** with Veterans, research partners, and Community Advisory Board members helped pressure-test the findings, identify gaps, and add community context.

Limitations of the Study

- The findings reflect the experiences of a **purposive, self-selected qualitative sample** and are not statistically representative of Massachusetts Veterans broadly.
- Recruitment through Veteran-serving organizations and community networks may have underrepresented **Veterans who are disconnected** from services, do not identify strongly with the Veteran community, or were less willing to discuss gambling.
- Participants were required to have gambled within the prior 12 months, which excluded **Veterans with historical gambling problems** who were no longer actively gambling.
- Although participants represented 25 Massachusetts towns and cities, in-person recruitment and interviewing in **Eastern and Southeastern Massachusetts** contributed to greater participation from those areas.
- Several **demographic and identity subgroups** included relatively small numbers of participants, so findings related to gender, race and ethnicity, LGBTQ+ identity, and other demographic factors should be interpreted as exploratory rather than as conclusions about those groups broadly.
- The study identified cross-cutting patterns across the support settings participants discussed, but it was **not designed to systematically compare** individual resources or service systems or assess their relative efficacy.
- The findings rely on participants' self-reported experiences and may be **affected by recall, interpretation, and willingness** to disclose sensitive information.
- The qualitative design **identifies patterns, meanings, and potential intervention** opportunities, but it cannot establish causality, determine the frequency of experiences across the broader Veteran population, or demonstrate that the proposed interventions will be effective.

Findings

Note: Findings reflect the Veterans and stakeholders who participated in this study, unless otherwise stated.

What Is Distinctive About Veterans' Gambling Experiences

The study did not include a non-Veteran comparison group. It therefore identifies Veteran-related contexts and solution adaptation considerations, rather than experiences proven to be unique to Veterans. The chart below provides additional context in which to interpret the findings.

Broadly Applicable Factors	Veteran-Related Contexts Identified in This Study	Implications for Program Design
Gambling for entertainment, social connection, excitement, coping, or financial gain	Gambling normalized in some barracks, deployment, and Veteran social settings	Existing prevention and support approaches may remain relevant but should be tested in military- and Veteran-informed contexts
Financial strain increases the consequences of losses	Transition-related disruption, service-connected health or employment challenges, and reliance on Veteran benefits shaped some participants' financial vulnerability	Adapt outreach timing, examples, referral pathways, and delivery partners to Veteran-related circumstances
Shame, concealment, and self-reliance can delay help-seeking	Military norms of toughness, concern about professional consequences, and distrust linked to prior institutional experiences affected disclosure for some participants	Offer confidential, low-stigma pathways and train trusted Veteran-serving messengers
Trusted relationships and peer support can facilitate engagement	Shared military experience increased credibility for many participants, though not all participants preferred Veteran-framed support	Provide both Veteran-led options and broader community-based or identity-responsive pathways
Mental health, substance use, trauma, and gambling can intersect	Some participants linked gambling with deployment, post-service transition, service-related trauma, or loss of military identity and structure which can further exacerbate these factors	Integrate gambling awareness into existing behavioral health, financial, and transition supports

What Makes Veterans' Relationship with Gambling Distinct: Motivations and Military Risk Factors

Veterans gamble for many of the same reasons as the general population: to socialize, relieve stress, cope with emotional pain, pursue financial gain, or experience excitement and anticipation. What distinguishes Veterans is not necessarily *why* they gamble, but the context in which those motivations emerge.

Military service and Veteran life create a set of conditions that can increase vulnerability to gambling-related harm. Participants described a military culture that normalizes gambling and discourages help-seeking, deployment environments where financial risk can feel detached from immediate consequences, and VA compensation payments that can serve as recurring gambling activators. Some Veterans also connected gambling's excitement and uncertainty to the high-intensity experiences associated with military service. Finally, the transition from military to civilian life often concentrates multiple risk factors at once, including loss of structure, financial strain, identity disruption, and reduced social support.

The findings that follow illustrate how military service and Veteran life shape a distinct risk context for gambling-related harm, even when the motivations for gambling themselves are familiar.

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Veterans gamble for many of the same reasons as the general population

Veterans described gambling as existing along a continuum. For some, it was a social or recreational activity that offered entertainment, excitement, connection, or participation in shared traditions. For others, it served to manage stress, cope with emotional pain, pursue financial opportunity, or recreate intensity.

Participants distinguished manageable gambling from harmful gambling less by the activity itself than by its impact. Gambling was more likely to remain manageable when they could maintain control, protect basic needs, avoid concealment or borrowing, and keep losses within their financial means.

Many Veterans described moving between these motivations over time, particularly during periods of stress or financial hardship.

These motivations are not unique to Veterans. What distinguishes Veterans is the military and post-service context in which they emerge, explored in the findings that follow.

The next three slides examine the nuances of this finding.

What We Heard

“It's fun. It's exciting. You don't know what's going to happen, you know, at any given time. You could be walking out of there with a pocket full of cash or walking out of there penniless.” —Veteran

“I got hurt and I was angry, and the first thing I did was gamble.” —Veteran

“I'd say very often when folks talk to me about compulsive behaviors...very often [it is] in response to some kind of emotion or symptoms that's distressing for them, and it becomes a way of trying to manage something. I would say with gambling as well.” —Clinician (Focus Group Participant)

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Gambling as a social activity—and nothing more

Many Veterans described gambling as a recreational activity woven into everyday life: playing cards in the barracks or during deployment, buying scratch tickets with family, participating in football pools or 50/50 raffles, playing Keno at a VFW, or visiting a casino with friends. In these settings, the primary value was often entertainment, excitement, camaraderie, or participation in a shared tradition rather than financial gain.

Military card games and informal wagering were frequently described as a form of connection during periods of downtime and isolation. Gambling at Veteran organizations similarly functioned as a social activity and, at times, as a form of fundraising or community participation.

These experiences help explain why many Veterans did not initially view their gambling as risky or even identify certain activities as gambling. For most participants who described these experiences, gambling remained manageable because it was limited, affordable, transparent, and did not interfere with basic needs or relationships.

What We Heard

“They’ll have squares at the club, so I throw \$50 on. I don’t even know who’s playing. I just do it to be involved with people and part of it.” —Veteran

“To me, it’s kind of a little bit of a fun activity, some entertainment. Sometimes you win a little bit, and you get excited.” —Veteran

“It’s strictly social.” —Veteran

“We did card games. I lived in the barracks. So, it was like, ‘all right, this day we’re gonna get together and play poker, spades.’” —Veteran

“Betting money definitely gives me more of a thrill... It makes it more engaging, more fun.” —Veteran

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Gambling as a coping mechanism for stress, emotional pain, and mental health challenges

Veterans described using gambling to manage stress, numb emotional pain, and escape difficult circumstances. This coping motivation is closely tied to mental health and trauma history, and it is where gambling is most likely to escalate into harmful patterns—particularly for Veterans carrying experiences that predate their gambling behavior.

What We Heard

“[It starts with] something overwhelmingly stressful—not having [electricity] for 52 hours—and I just spent probably like \$70, \$80 on lottery tickets as soon as the power came back on because I was like, ‘This sucks, let me get away from here.’” —Veteran

“We live fast, we live hard, you lose people. So sometimes you just want to escape.” —Veteran

“I had lost my brother. I had found myself spending a lot of money gambling, and I’m like, ‘why am I doing this?’ What [my providers] told me was it’s called angry gambling. So you gamble through anger and through hurt... Some people will drink, some people will do drugs, [I] gamble.” —Veteran

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Gambling as a perceived path out of financial hardship

For Veterans experiencing financial strain, gambling can feel like one of a limited number of available options. A lottery ticket or a casino bet represents not just a chance at winning, but a way out. Economic vulnerability is a significant and recurring driver of gambling-related harm in this population.

For some, this pattern developed while on active duty. Veterans who served as lower-enlisted troops on modest pay described gambling entire paychecks—because gambling was the most accessible activity in a constrained environment. And after years of hard, low-paid service, a distinct psychology emerged: a hunger for “easy money” that made gambling feel not just tempting but logical.

What We Heard

“The possibility that your whole world could change. There have been, sadly enough, times where winning \$70 was like, ‘all right, there's gas and food.’” —Veteran

“For me it's just like the hope of being able to live a decent life... that's why I always played the Lucky for Life. Because it was \$365,000 a year, and in my head, that's rich.” —Veteran

“If you got \$50 in your pocket. You don't have a place to sleep at, and a motel room's \$50. You can go get the motel room and be completely broke, or you can try to take that \$50 and make it into \$100.” —Veteran

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Veterans Distinguished Harmful Gambling by Its Impact, Not Simply Frequency or Cost

Veterans did not define harmful gambling based on a single dollar amount, activity, or frequency threshold. Instead, they described a set of practical and behavioral indicators that distinguished recreational gambling from that which caused harm.

Gambling was more likely to be viewed as manageable when participants could stop at a preset limit, use designated “fun money,” pay bills and meet basic needs, remain open with family members, and avoid chasing losses or borrowing money.

Gambling shifted toward harm when it became difficult to stop, depleted income needed for food or housing, was concealed from others, required borrowing, or became a primary response to distress. The same amount of gambling could therefore have very different consequences depending on a Veteran’s income, housing stability, family responsibilities, and available support.

Participants described both gradual escalation and sudden turning points, including transition from service, emotional distress, financial hardship, increased online access, and the loss of military supports that had previously made financial losses feel less consequential.

What We Heard

“I’ll only play with money that I know I can lose and it won’t affect paying the bill or paying for medication or things like that.” —Veteran

“I had lost my brother. I had found myself spending a lot of money gambling... So, you gamble through anger and through hurt... I lost my car to repo.” —Veteran

“Even if I’m only spending, like in a month at my worst I was spending like \$100 or \$200 a month... I’d spend those \$200 and then I’d have to ask my friend for like \$200 or \$250 just to make it through to the end of the month.”
— Veteran

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Identity and Military Experience Shape Veterans' Perspectives

Participants described their Veteran identity as one of several factors shaping their relationship with gambling, trust, and willingness to seek help. The clearest recurring patterns were tied to Veteran identity and military-service experience.

Shared military service often fostered credibility and connection. Many participants said they were more comfortable speaking with someone who understood military culture, while norms of self-reliance and toughness could make disclosure more difficult.

Deployment, transition from service, service era, and socioeconomic circumstances also shaped gambling exposure and vulnerability. These factors frequently interacted with one another rather than operating independently.

Veterans are not monolithic. While common themes centered on Veteran identity, shared military experience, trust, and disclosure, participants differed in whether Veteran-serving environments felt inclusive, credible, or relevant to their broader identities. Evidence related to gender, race and ethnicity, LGBTQ+ identity, and other demographic characteristics was generally more limited. These accounts remain important, particularly where participants described exclusion or mistrust, but they do not support conclusions about those groups broadly.

What We Heard

“I wouldn't go and talk to anybody that wasn't Veteran-connected because I just think like to understand a person and appreciate where they're coming from, you kind of have to walk a mile in their shoes... My time in the service definitely shaped me... It's still a big part of who I am. And so, you know, I would want someone to be... just know where I'm coming from, kind of thing.” —Veteran

“It's difficult for a veteran to ask for help, even though they need it and they want it. They feel like they're this, you know, pillar of concrete and they can't be broken down and they can't ask for assistance.” —Veteran

“My VSO where I was living at the time in [redacted] treated me horribly. Told me I wasn't a Veteran because I was female and I didn't serve in 'Nam.” —Veteran

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Military culture can normalize gambling while suppressing disclosure

Military culture shapes gambling risk through three interconnected dynamics: normalization, stigma, and professional consequence.

For many Veterans, gambling was simply part of the active-duty environment—card games in the barracks, casino trips near duty stations, and deployment downtime where it became routine. Veterans often described gambling not as a risky behavior, but as something everyone did.

Yet the same culture that normalized gambling discouraged help-seeking, with expectations around toughness, self-reliance, and keeping health problems private, creating stigma that was both external and internalized.

For service members and Veterans in security-clearance-dependent roles, disclosure may carry perceived professional consequences beyond the emotional difficulty of asking for help. Because financial instability can affect clearance eligibility and employment, acknowledging gambling-related harm may feel professionally risky. This creates a structural barrier to disclosure that is distinct from shame or internalized stigma.

What We Heard

“My first introduction to gambling was [when] I went into the Army at 17 years old. Shooting craps was one of my main things.” —Veteran

“I was stationed in eastern Connecticut, about 20 minutes from the largest casino in America...for nine out of my 10 years. We would go to the casino on the weekends. That's what we did.” —Veteran

“In my military experience, there was a huge stigma around getting help. There were multiple times my [fellow soldiers] went to get help and were penalized for it.” —Veteran

“A big stigma comes from that community, because certain military occupations require security clearances, and if there's a fiscal instability in that individual's life, that clearance can get pulled, and then they lose their jobs, so it spirals really, really quickly.” —Veteran Service Officer (Focus Group Participant)

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Gambling recreates an intensity that some Veterans associate with military service

For some Veterans, gambling is intrinsically appealing in a way that goes beyond social connection, entertainment, or the allure of potential financial gain.

The adrenaline of a close game, the anticipation of a winning hand, the feeling of being on the edge of something that could change everything: these experiences mirror the high-stakes intensity that military service normalized as part of daily life. And once they start gambling, that same intensity shapes how they play.

Veterans described being unable to stop when ahead, escalating when behind, and bringing the same ‘all-or-nothing’ commitment to gambling that they brought to military service. For this group, the draw and the pattern are inseparable.

What We Heard

“The rush. The rush. Yeah, it really is a rush. And especially if it's the close game. That's the rush for me.” —Veteran

“Whatever it is, whether that's the slot machine, whether that's the card games, or whether it's being on a mission and getting to that point pre-execution. There's that buzz and that hum that take you through it.” —Veteran

“So now I'm out [of the military] and it's almost the same...I'll go to the casino, I'll play until I don't have anything, or I'll play until I win big, whatever that is. It's very difficult for me to pull back...[an] all or nothing kind of thing.” —Veteran

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Deployment combines greater gambling exposure with fewer perceived financial consequences for some Veterans

For Veterans who deployed, the financial and social environment was unlike anything in civilian life. Income accumulated with few opportunities to spend it while housing, food, and other basic needs were guaranteed. Money simply piled up in the bank, making losses feel less consequential.

Long periods of downtime were often filled with card games, poker, slot machines, and sports betting that became embedded in daily life, and for some Veterans, deployment earnings then provided a ready bankroll upon returning home, allowing gambling behavior established during deployment to continue or intensify.

Together, accumulated income, reduced perceived consequences, social exposure to gambling, and limited recreational alternatives make deployment a unique risk window.

What We Heard

“My first deployment, it was 9 months... all the money coming in, just going into the bank... We could not spend it while deployed, so it just piled up. All my earnings from the deployment, I depleted them by betting [at] casinos... let's say \$30,000 that I earned. It was gone within a month.”
—Veteran

“[When I’m deployed,] I’m always going to have a house. I’m always going to have food. So, it was easier to, I guess, continue [gambling] and maybe increase the betting. More risk; more gain.” —Veteran

“I spent, better part of 12 of 27 years [in service] overseas, and I noticed that while I was overseas, there was a lot of gambling during soldiers' free time. I worry about how that [translates] into Veterans' daily living activities and habits.” —Veteran Service Officer (Focus Group Participant)

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The transition out of service represents a particularly high-risk window

The transition from military to civilian life emerged as a particularly vulnerable period. Separation removes conditions that made gambling feel low-stakes during service—stable income, housing, structure, and social connection—while introducing new financial pressures and uncertainties.

Veterans described depleting deployment earnings, gambling more as financial strain intensified, and struggling with the loss of identity and purpose that service had provided. The transition period can transform gambling from a manageable habit into a source of significant harm.

Both Veterans and stakeholders identified this window as a critical intervention opportunity.

What We Heard

“You're sending them home like, ‘here's 30 days of your medicine and your DD-214... you'll figure it out.’” —Veteran

“After I got out of the military, I definitely was gambling a lot. I would never ask [for] money to gamble, but what I would do is I'd gamble all my money away and then ask my friends for loans to get me through eating and stuff like that.” —Veteran

“You lose a sense of purpose. You lose a sense of meaning and importance. When I was in the military, I was the head honcho. And then when you get out, you're a civilian [but] not a lot of people understand your skills or experience that you bring to the table.” —Veteran

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Monthly VA compensation checks can create a recurring gambling activator post-service

For some Veterans receiving VA disability, pension, or other payments, monthly disbursements can create a recurring cycle of perceived financial security—even abundance—that leads to increased gambling, followed rapidly by financial depletion and mounting pressure. For some, gambling became closely tied to the rhythm of payment disbursement itself.

Disability rating reductions could trigger the same pattern in reverse, creating financial pressure that drove gambling to replace lost income.

In both cases, gambling was activated by changes in financial circumstances, either through a temporary sense of abundance or a perceived need to recover losses.

What We Heard

“When I first get my check, it's like you got extra money, so it's almost like you feel like king for a day. So, you just get whatever you want ...for a day. And so, buying more scratch tickets is a part of that. It's like an upgrade.” —Veteran

“My big trigger is always the beginning of the month when I get my money.” —Veteran

“A couple of days, it'll be the first of the month. Most Vets who have either a VA pension, [or a] service-connected disability, they're about to get their planned-upon money... and hopefully by the 15th..., they won't be standing around like, ‘Oh my God, how am I going to pay for whatever?’” —Veteran

“When we give out our checks, I would see Veterans with their front pocket completely bulg[ing] with scratch tickets...their whole check would pretty much go.” —Veteran Service Officer (Focus Group Participant)

How Veterans Manage Gambling through Self-Directed, Relational, and Indirect Pathways

Veterans described several pathways that helped keep gambling within acceptable limits or reduce harm as those limits began to erode. These included self-directed strategies (e.g., designated “fun money,” app deletion, and avoiding specific locations); relational supports, including partner or peer accountability; formal gambling-specific tools, such as self-exclusion; and indirect pathways via treatment for co-occurring conditions (e.g., depression, PTSD, anxiety, or substance use).

These strategies operate across the gambling continuum. For some, they preserve gambling as recreation; for others, they address escalation or established harm. Most participants relied primarily on self-directed and relational strategies rather than sustained engagement with gambling-specific services, drawing on discipline, trusted relationships, meaningful responsibilities, and care for related conditions. While many of these mechanisms are broadly applicable, their use by participants in this study was shaped by military culture, Veteran identity, reluctance to disclose vulnerability, and limited awareness or use of gambling-specific services.

Together, these accounts show that harm reduction is occurring, but often quietly and unevenly. Its effectiveness depends on financial circumstances, social support, gambling access, and the ability to maintain boundaries over time. What also stands out is that these strategies are rarely gambling-specific or system-driven. The findings that follow examine these protective mechanisms and the conditions shaping their success.

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Veterans often rely on self-directed guardrails rather than gambling-specific support

Many Veterans have developed self-directed strategies to limit gambling's impact, including setting spending caps, allocating "fun money," deleting sports betting apps, avoiding triggers such as stores that sell scratch-off tickets, and recognizing when to walk away.

A small number have taken additional steps by enrolling in formal self-exclusion programs, which can create a concrete, enforceable boundary between themselves and gambling venues and supplement personal willpower. However, awareness of these programs remains low, and their effectiveness is constrained by jurisdictional limits.

Overall, these Veterans are motivated to contain gambling's impact through self-initiated strategies, though these approaches are not always sufficient on their own and require ongoing effort to maintain. These practices are not unique to Veterans, but participants often relied on them because gambling-specific resources were unfamiliar, unavailable, or not viewed as a natural source of support.

What We Heard

"So, we ha[d] a fun money rule. If the fun money is gone, we didn't go out to eat or we didn't do this, that, and the other thing. We sure as hell ain't dipping out of the bill money."
—Veteran

"I ended up making the decision to enroll myself [in the] Massachusetts Self-Exclusion Program... It's a voluntary list where you sign up to voluntarily ban yourself from the facilities and, if applicable, any online gambling services if you sign up for that as well." —Veteran

"I'll delete it off my phone and then something will come up. I'll be like, 'okay, let me download it' and then I'll just pour a couple hundred dollars into it until I say, 'you know what, I need to get this off my phone again.'" —Veteran

"Sure, I went to [Gamblers Anonymous] meetings. They're hit or miss. It all depends on who's running the meetings. Some GA meetings I'd walk out and want to gamble because I'd hear the stories." —Veteran

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Social support is the protective factor Veterans described most often

Many Veterans described the most meaningful protection against gambling-related harm as coming from the people around them—a sponsor, a partner, a fellow Veteran who notices and shows up. These relationships provide accountability, connection, and a reason to pull back.

Veteran peer relationships frequently surfaced in the interviews. Participants consistently described greater trust in people who had “been through it” or understood military culture, and some described reaching out directly when another Veteran began to struggle. Shared experience reduced the need to explain themselves and made disclosure feel safer than approaching a formal program.

This protection depended on the relationship feeling authentic. Support from someone perceived as superficial, self-serving, or disconnected from the Veteran’s experience did not provide the same anchor. Veteran identity, camaraderie, and distrust of formal institutions therefore shape both who Veterans are willing to hear from and when they feel comfortable disclosing difficulty.

What We Heard

“To me, the opposite of addiction is connection. Now when I have an addictive thought, I’ve got a sponsor. I’ve got a place to go to make a telephone call to somebody that’s gonna listen to me and give me good advice. If I didn’t have that connection, there’s a lot of times in this world I would have slipped up.”
—Veteran

“I would say I found the perfect partner to give me a slap in the face every now and then, just having control of my finances. I am definitely not good in controlling my finances.” —Veteran

“I’d rather talk to somebody that’s been through it, and if they’ve been through it, obviously I’m going to listen more.” —Veteran

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Some Veterans address gambling indirectly through treatment for other conditions

For some Veterans, the path to managing gambling starts with getting help for something else—depression, anxiety, PTSD, or substance use. In doing so, they discover that treating an underlying condition provides meaningful relief from gambling urges as well. This is often not a planned outcome: because gambling is rarely disclosed as a primary concern, the relief comes as a byproduct of addressing what Veterans were willing to name.

Compulsive behaviors like gambling are frequently a response to distressing symptoms, meaning that treating the co-occurring condition can reduce the behavior even when gambling itself was never the stated focus of care.

While treating co-occurring conditions is not unique to Veterans, participants shared that gambling often remained undisclosed and unaddressed within mental health, substance use, and other care they were already receiving.

What We Heard

“I detoxed in Denton, Texas in 2023. And so doing AA helped me a little bit with the gambling as well. [It’s kind of] the same words, in the same groups... I’ve used some of those techniques to be able to help me with [gambling].”

—Veteran

“My gambling went down when I started getting medicated for my depression. I think a lot of times people aren’t just gambling addicts... they might be depressed or experiencing something else.” —Veteran

“I see my shrink on the phone once a month, so I know the triggers [for gambling]... Like, when the urge came, I knew it was because I was angry. I knew it was because I was hurt.”

—Veteran

“I think a large majority of the folks that we see in our, recovery-focused programs have another co-occurring mental health condition.” —Clinician (Focus Group Participant)

How Gambling-Related Harm Affects Veterans' Financial, Social, and Emotional Well-Being

For many Veterans in this study, gambling remained recreational or manageable. But for those whose gambling has escalated, the effects extended beyond financial loss to relationships, emotional well-being, housing stability, and willingness to seek help.

Many of these harms are not unique to Veterans. What the findings illuminate is how they were shaped by Veteran-specific circumstances, including military norms of self-reliance, transition-related disruption, fixed or benefit-based income, service-connected health concerns, distrust of institutions, and limited awareness of gambling-specific support.

The findings that follow examine both the consequences of gambling-related harm and the conditions that make that harm difficult to recognize, disclose, and address.

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Financial instability increases vulnerability to gambling-related harm

For Veterans whose gambling has escalated, financial consequences range from depleted savings and missed bill payments to car repossession, food insecurity, and homelessness.

The underlying mechanism is not unique to Veterans: the same gambling loss has greater consequences when a person has fewer resources available to recover. In this study, however, that vulnerability was often amplified by Veteran-specific circumstances, including reliance on VA disability compensation and pension, Chapter 115 assistance, or other fixed income; transition-related financial instability; and service-connected health or employment challenges.

Several participants also described gambling as a perceived path out of hardship. When financial options felt limited, a lottery ticket or bet could represent hope of relief, even when the loss further reduced already limited resources. Financial hardship and gambling-related harm therefore reinforced one another for some participants.

What We Heard

“Last year I had \$100,000 in the bank. There's no reason I should even be in the shelter, but here I am. And a lot of it... [is because of] drug addiction and the gambling addiction.”

—Veteran

“While I was living in Las Vegas, gambling made me homeless. Yeah, quite a few times.” —Veteran

“As desperation cranked up, so did my willingness to gamble.” —Veteran

“Just because you spend a small amount, doesn't necessarily mean that it doesn't impact your life. If it's still 20% of your income going to gambling... that's still 20% of your income.” —Veteran Service Officer (Focus Group Participant)

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The social and emotional toll of gambling-related harm is often harder to see and recover from than the financial losses

Multiple participants described the relational and emotional consequences of gambling as equal to or greater than the money lost. Concealment, broken trust, conflict, and the failure to meet family responsibilities affected how participants saw themselves as partners, parents, and Veterans.

Shame operated at several levels. Participants described shame about losing money, being unable to stop, deceiving people they cared about, and failing to live up to military-ingrained expectations of discipline, responsibility, and self-reliance. For some, these expectations were reinforced by military culture, where acknowledging loss of control or asking for help could feel incompatible with the identity they had been expected to maintain.

The resulting shame also reinforced concealment. Hiding gambling required participants to manage explanations, financial gaps, and conflicting versions of their lives across relationships, which deepened isolation and made disclosure less likely. Even Veterans already receiving mental health or substance-use care often did not raise gambling as a concern.

Financial losses may be recoverable, but damaged trust, diminished self-worth, and prolonged secrecy can persist long after gambling has stopped or decreased.

What We Heard

“There's a lot of shame involved... the loss of income, the loss of self-esteem, the loss of motivation, the manipulation.” —Veteran

“[Gambling became] no different than the drug addiction that I was fighting. I'm always trying to get money to either get high or gamble, and one addiction or the other... causes strains on relationships, girlfriend, not being a good father, not being a good son, not being a good brother.” —Veteran

“So, if you're spending a lot of time hiding, what you're actually doing is lying to every person that you encounter. So, your life is a lie. You have to put on a performance for your wife, your kid, your employer, your co-worker, everybody... Silence is a killer.” —Veteran

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Gambling-related concerns often remain undisclosed across support settings, an issue compounded by institutional distrust

Across nearly every interview, participants reported no awareness of Veteran-specific gambling resources. Veterans in active VA mental health care described never having disclosed their gambling—not because they refused, but because the question never came up.*

Trust in organizations is highly personal and often fragile. Some Veterans, particularly those with positive VA experiences or strong community ties, express meaningful trust in Veteran-serving institutions while others, including those discharged under policies later repealed and those who have watched benefits change without notice, describe near-total distrust of formal systems.

What emerges consistently is that trust is built through individual relationships, not institutional reputation, and that gambling is one of the last things Veterans are likely to disclose to anyone until a crisis makes it unavoidable.

Several common factors shaped whether Veterans sought help, disclosed gambling-related concerns, or remained engaged. Shame and concealment often delayed disclosure, while institutional distrust and limited awareness of gambling-specific resources reduced the likelihood that Veterans would seek formal support. In contrast, trusted relationships, shared military or lived experience, and practical assistance created lower-stigma pathways for engagement.

What We Heard

“I would guess that most Veterans would tell you there are none. That, like, obviously there's gambling resources, right? But focused, like, Veteran resources for gaming, I never heard of such a thing.” —Veteran

“I had never mentioned about my gambling problem to someone other than my spouse. Even though I've had mental therapy through the VA, I actually never mentioned about the gambling problem.” —Veteran

“I've never heard anything specific to gambling problems for Veterans.” —Veteran

“I think that [asking about gambling] is something I want to incorporate into my conversation when I'm meeting clients and Veterans for the first time because of this discussion, so thank you for having me on.” —Veteran Service Officer (Focus Group Participant)

**A pilot study in VA primary care behavioral health demonstrated the feasibility of screening for gambling disorder and identified a need for greater attention to gambling within routine care (Kraus et al., 2020).*

What It Takes to Reach Veterans

Participants and stakeholders identified existing, trusted pathways for reaching Veterans that are not yet consistently activated around gambling-related harm. The infrastructure to support them exists. The trusted messengers exist. The natural touchpoints exist. What's missing is coordination, intentionality, and a delivery model built around how Veterans engage with support rather than how institutions expect them to. The findings in this section point toward a clear and actionable path forward for Massachusetts—but they also carry a warning: Veterans have watched agencies come in, gather information, promise change, and disappear without results. That institutional credibility gap is real, and any effort to reach Veterans must be designed with follow-through at its center.

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Trust generally depends on known relationships, transparency, and clear pathways to support

Veteran trust in support systems generally reflected three orientations:

- **Interpersonal over Institutional:** Many participants trusted an individual provider, clinician, peer, or Veteran Service Officer while remaining skeptical of the larger organization.
- **Community over Institutional:** Some placed greater trust in community-based organizations that offer personal relationships, continuity, and local accountability.
- **Pragmatic Access:** Others were open to formal services but lacked awareness of available resources or a clear route into support.

Across these orientations, trust was shaped by familiarity, transparency, and credible referrals. Participants were more cautious about unfamiliar organizations, unclear fees, inconsistent funding, and services perceived as deceptive or self-interested, including fake claims assistance and misleading support groups. Trust in a specific person or community organization did not necessarily extend to the broader institution.

What We Heard

“I got trust with the individual that is my doctor, but not in the larger organization.” —Veteran

“I would put more trust in community-based groups than I would in the VA, mostly just because government funding is subject to the whims of whatever Congress and/or the president [decide] at any given moment... especially in my circumstance, like there's a political agenda [about] trans folk, unfortunately. And I've seen benefits get taken away in my lifetime.” —Veteran

“Anybody working with Veterans should be culturally aware of military culture [and] expect that there is going to be a higher level of mistrust. You are going to have to work harder to gain that trust...maybe versus other populations.” —Clinical Program Manager (Focus Group Participant)

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Veteran identity is a point of pride and connection, but reaching Veterans means engaging the whole person

For most Veterans in this study, service is a core part of their identity, a source of pride and connection, and a powerful lever for trust and engagement.

But the Veteran community is not monolithic. Women Veterans, LGBTQ+ Veterans, and Veterans of color describe navigating spaces not designed with them in mind, and in some cases being told outright that they do not belong. For these Veterans, effective support must engage the whole person, not just their Veteran identity. Intersectional identity matters.

The willingness to engage with support was explicitly tied, in multiple interviews, to whether the person or program reflected another aspect of the participant's full identity, not just their service-based one.

At the same time, a meaningful portion of participants stated that their Veteran identity had no bearing on their gambling or help-seeking. For them, military service was a job—one chapter of a larger life—and framing all outreach through a Veteran identity lens would miss them entirely.

What We Heard

“There are specific challenges about being a Veteran that only Veterans can understand. Unfortunately, there are also specific challenges about being queer that only queer people understand, and the overlap isn't great.” —Veteran

“I'll walk down the hall [at VA] and I'll be asked questions like, ‘What's your sponsor's Social Security number?’ I'm like, ‘I don't have a sponsor. I have my own Social Security number. I served.’” —Veteran

“‘Veteran’ is just one of many hats that people wear. They might be mothers or fathers, or maybe Latino or Black or queer. And those identities also matter just as much as the Veteran identity.” —Veteran

“[Being a Veteran] is a piece of their identity that carries through all different parts of their life, whether it's a new occupation, their role in their family, different decades, and stages ... of life.” —Clinical Program Manager (Focus Group Participant)

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Reaching Veterans requires proactive connection, and the ask itself is a critical first step

Veterans rarely seek help specifically for gambling-related concerns. Military culture discourages it, shame compounds it, and awareness of Veteran-specific resources is nearly nonexistent. Participants described receiving VA mental health care without ever disclosing their gambling, not because they refused but because they were never asked.

Participants in one transition house described talk of the research team's interviews rippling through the building. Veterans were talking to each other about what came up, surfacing experiences they hadn't named before.

Practical entry points are already present in existing systems. But how the question is asked matters as much as whether it is asked: check-the-box digital forms do not produce honest answers. The ask works when it is part of a conversation, coming from someone the Veteran already trusts.

What We Heard

"I know when I'm not doing well, whether that's financially or mentally or whatever it may be, it's a lot easier to admit that if a person asks me than for me to go and ask for that help myself."
—Veteran

"Or maybe you guys could even work with the VA, right? Like those questionnaires when you go to the doctor, oh, like, 'how much alcohol do you consume'... slap a gambling question in there." —Veteran

"I didn't realize how much it affected me until I came here. I kind of, like, buried it." —Veteran

"I think on the clinical end, we do have ways of assessing [gambling-related harm]...but we don't do it as a matter of course for everybody." —Clinician (Focus Group Participant)

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Effective support is peer-led, community-embedded, flexible, and partially exists

To effectively reach and support Veterans, tap into the ways Veterans already navigate the world rather than building from scratch. Veterans and clinicians recommended working through organizations that already have Veterans' trust and reaching them through *people* rather than *new programs*. Strategies include:

- **Leveraging Existing Networks:** Veterans are already connected to VSOs, peer groups, and community organizations. Programs should distribute support through these established, trusted channels.
- **Prioritizing Lived Experience:** Peer support should be a prominent option. Veterans often prefer to work with someone who has “been through it” and understands their context without an explanation.
- **Offering Flexible Engagement:** Programs must meet Veterans where they are—emotionally and logistically, offering multiple modes of connection (e.g., online, phone, informal social settings).
- **Using Financial Literacy as a Gateway:** Budgeting conversations with case managers or VSOs are practical, low-barrier entry points. Because financial strain is often the first visible sign of problem gambling, these discussions create a natural opening for screening.
- **Using Social Gambling Settings for Low-Stigma Outreach:** Veteran organizations, sports pools, raffles, and community events may support brief education, financial check-ins, and peer outreach. Because they can also normalize risk, outreach should preserve their social value while increasing awareness.

What We Heard

“[It’s] essential, crucial. Why would I talk to a non-Veteran person about gambling problems or addiction? I wouldn't do it.”
—Veteran

“I work closely with our VSO... and he'll call me and go, 'Hey, I got this Veteran. I can't really help him, but this is what's going on.' And then he pushes them to our website and our organization.” —Veteran (and Community-Based Organization Representative)

“I'd probably feel more comfortable reaching out if there were online resources versus just going in person. I feel like a lot of times the Veteran won't go because they have to go somewhere and then go talk about it.” —Veteran

“We try to work on a peer specialist or peer support kind of model as best we can. We find that it can be really helpful with breaking down the barriers.” —Clinical Program Manager (Focus Group Participant)



Technical
Assent

Discussion

From Insights to Action

This section synthesizes the key findings from Veteran interviews with the perspectives of clinicians, VSOs, and community advocates who participated in stakeholder focus groups as well as the existing research literature on gambling among Veteran populations. Together, these three data sources yield five core insights into Massachusetts Veterans' gambling habits and explain the current landscape, root causes, and barriers to meaningful change.

Each insight is structured around two simple but important questions:

- What do Veterans, practitioners, and the broader system want to achieve?, and
- What is currently getting in the way?

The solution design considerations that follow represent initial steps to address the barriers and pain points elevated from the insights. Future solution design should build on the cross-cutting facilitators identified in the research, including trusted messengers, shared military or lived experience, practical assistance, and transparent referral pathways. It should also address the barriers that repeatedly constrained engagement, including shame, concealment, institutional distrust, and limited awareness of gambling-specific resources.

**Descriptions of “what the evidence tells us” reflect the findings from Veterans and stakeholders who participated in this study, unless otherwise stated.*

Gambling-related harm among Veterans often goes undetected, but existing systems are well positioned to change that

What the evidence tells us: Most participants reported never being asked about gambling by a healthcare provider, VSO, or other Veteran-serving professional, despite many regularly interacting with these systems. This is a pattern corroborated by an MGC-funded study that identified possible gaps in screening for gambling disorder by VA providers during routine medical care (Kraus et al., 2020).

Focus group participants confirmed the gap: gambling is not routinely asked about, organizational silos prevent warm handoffs, and most VSOs lack the training and resources to recognize or respond to gambling-related harm even when they suspect it.

Gambling-related harm goes undetected, not because it is rare, but because it is often not discussed, routinely screened for, or addressed as part of Veteran well-being. These gaps may be especially consequential for Veterans with complex health and social needs who already face challenges navigating fragmented systems (Miller et al., 2021). Several participants indicated this study was the first time they had been asked about gambling in a Veteran context. The most practical entry points already exist. They just need to be activated.

Solution Design Consideration: Integrate gambling screening into existing VA appointments, primary care visits, and touchpoints with community organizations (e.g., VSOs and nonprofits, etc.), and better equip those systems to respond.



“Or maybe you guys could even work with the VA, right? Like those questionnaires when you go to the doctor, oh, like, ‘how much alcohol do you consume’... slap a gambling question in there.”

—Veteran

Veterans facing gambling-related harm need confidential, low-risk pathways to disclose and seek help

What the evidence tells us: Even when Veterans recognize that gambling has become a problem, the cultural and professional conditions of military service create powerful disincentives to acknowledging the problem openly. Self-reliance, emotional suppression, and a “work hard, play hard” mentality create the conditions to keep gambling behaviors hidden and avoid seeking support. As a result, shame becomes both a consequence and a barrier.

For Veterans receiving mental health care, shame is one reason they never raised gambling during treatment. For those in security clearance-dependent roles, acknowledging a gambling problem may feel professionally risky because financial instability can affect clearance eligibility and employment. For Veterans on fixed incomes, gambling-related harm and poverty compound each other in ways that are very difficult to escape, and the financial consequences of disclosure can feel as threatening as the problem itself.

Research confirms these are not isolated experiences: a qualitative study of 28 U.S. Veterans identified emotional suppression rooted in military culture and structural ignorance of gambling problems as the two primary barriers to treatment (Vana et al., 2025), and only 2.1% of Veterans with problem gambling reported seeking help (Metcalf et al., 2022). Thus, the challenge is addressing the conditions that make disclosure feel risky.

Solution Design Consideration: Effective interventions should account for the conditions that make disclosure and help-seeking feel risky. Interventions should prioritize psychological safety by offering confidential, low-barrier pathways to care and decoupling support for gambling-related harm from immediate career or security-clearance repercussions.



“There's a lot of shame involved... the loss of income, the loss of self-esteem, the loss of motivation, the manipulation.”

—Veteran

The service member-to-Veteran journey creates predictable windows of gambling risk and opportunities to intervene

What the evidence tells us: Rooted in conditions of military service, service members and Veterans are disproportionately affected by gambling-related harm (Freeman et al., 2020; Kindbridge Research Institute, 2022). Participants described gambling as normalized through barracks culture, deployment downtime, and informal wagering among peers, with no negative framing attached. Deployment compounded this by creating unique financial conditions: income accumulated while basic needs were covered, increasing comfort with financial risk.

Research indicates that gambling-related harm can be intertwined with psychological distress, PTSD symptoms, and gambling used as a form of escape or coping (Dighton et al., 2023). These vulnerabilities may become particularly acute following discharge, when Veterans can experience loss of routine and camaraderie, identity-related adjustment, isolation, and financial or employment stressors (Dekel et al., 2026).

For Veterans receiving monthly VA compensation, participants described a recurring cycle of perceived abundance and rapid depletion that may create additional windows of elevated risk. Therefore, the findings suggest that risk may cluster at predictable moments. Those moments represent concrete opportunities for intervention.

Solution Design Consideration: Target outreach and prevention at moments of elevated risk, including during service, at transition, and around VA compensation disbursement periods.



“[When I’m deployed,] I’m always going to have a house. I’m always going to have food. So, it was easier to, I guess, continue [gambling] and maybe increase the betting. More risk; more gain.”

—Veteran

Gambling often functions as a response to underlying distress—care for co-occurring conditions can help manage it

What the evidence tells us: Participants frequently described gambling to cope with emotional pain, manage stress, navigate financial hardship, or recreate the intensity they missed after leaving military service. For some, it is also intertwined with depression, PTSD, anxiety, and substance use. Several Veterans described their gambling urges diminishing after receiving treatment for underlying mental health concerns, despite never seeking gambling-specific care.

Research confirms that Veterans who gambled are more than 7x as likely as non-Veterans to report avoidance or escape from distress as a gambling motivation (Dighton et al., 2023); that PTSD symptoms are associated with a higher risk of developing problem gambling up to 10 years later (Etuk et al., 2020); and that among VA mental health service users, pathological gambling is associated with increased rates of depression, anxiety, and substance use disorders (Edens & Rosenheck, 2012).

Focus group participants echoed this, describing gambling as one expression of a broader pattern of compulsive behavior in response to distress.

Solution Design Consideration: Embed support into existing mental health, substance use, and financial counseling pathways, ensuring that holistic care plans account for gambling-related harm as a symptom of broader psychological and/or financial distress.



“My gambling went down when I started getting medicated for my depression. I think a lot of times people aren't just gambling addicts... they might be depressed or experiencing something else.”

—Veteran

Credible engagement depends on identity-responsive, peer-led, and community-embedded outreach



What the evidence tells us: Trust emerged as one of the most important determinants of engagement throughout the study. Participants frequently distinguished between trust in individuals and trust in institutions, describing meaningful relationships with clinicians, peers, and VSOs, even when they remained skeptical of larger organizations.

Veterans participating in a peer-led patient navigation intervention described improved engagement in care, stronger patient-clinician relationships, and greater confidence communicating with clinicians (Eliacin et al., 2023). Broader research has also identified negative attitudes toward services, prior care experiences, stigma, and pride as barriers to Veterans' help-seeking (Hitch et al., 2023).

Trust also operates differently depending on who the Veteran is and what they have experienced. Women Veterans, LGBTQ+ Veterans, and Veterans of color describe navigating spaces not designed with them in mind, meaning that trust in these communities relies heavily on explicitly proving a space is safe and inclusive.

Together, these findings suggest that gambling-related outreach should be transparent, explicitly no-fee, credibly endorsed, and designed to offer multiple pathways for connection.

Solution Design Consideration: Invest in peer-led, community-based programming and harm-reduction messaging that recognizes gambling's recreational and social value and reflects the full diversity of the Veterans it aims to reach. Integrate outreach into settings where gambling is already visible, when appropriate.



“I would put more trust in community-based groups than I would in the VA, mostly just because government funding is subject to the whims of whatever Congress and the president [decide] at any given moment. And they're also, especially in my circumstance, like there's a political agenda [about] trans folk, unfortunately. And I've seen benefits get taken away in my lifetime.”

—Veteran

Appendix

Human Subjects Protections

This study was conducted in accordance with applicable federal requirements for research involving human participants under 45 CFR 46. Technical Assent submitted the study to the Biomedical Research Alliance of New York (BRANY) SBER IRB, which determined the research to be exempt under Categories 2(i)(a) and 2(iii), with limited IRB review. Research personnel completed required human subjects protection training, and the research team implemented the following safeguards.

Consent & Voluntary Participation

- Eligible participants received an informed consent form before their scheduled session and had an opportunity to review it and ask questions.
- At the beginning of each interview or focus group, a trained research team member reviewed the consent form, confirmed participants' understanding, and obtained electronic consent.
- Participants were informed that participation was voluntary and that they could skip any question, decline to answer, or withdraw at any time without penalty or effect on their relationship with any organization or service.
- Participants provided separate permission for audio recording and could participate without being recorded.

Privacy & Confidentiality

- Interviews were conducted virtually through secure Zoom sessions or in person at a mutually agreed private location. Stakeholder focus groups were conducted virtually.
- Participants were assigned unique study IDs, and identifying information was separated from research data and stored in an encrypted linkage file accessible only to the principal investigator.
- Transcripts and analytic materials were de-identified before analysis, and quotations used in reporting were reviewed to remove identifying details.
- Focus group participants were asked to respect the confidentiality of the discussion; however, confidentiality among participants could not be guaranteed.

Data Security & Retention

- Screening data, recordings, transcripts, notes, and analytic files were stored in Technical Assent's secure, password-protected, encrypted Box environment.
- Access was limited to authorized research personnel trained in human subjects protections, confidentiality, and approved study procedures.
- Audio recordings were deleted after transcription accuracy was verified.
- De-identified transcripts and analysis files may be retained for up to five years after study completion and then permanently destroyed.

Participant Risk & Support Procedures

- Interview and focus group guides were designed to address sensitive topics using trauma-informed, nonjudgmental questioning. Participants could skip questions, pause, or end the session at any time.
- Research team members were prepared to pause the discussion and assess whether a participant wished to continue if signs of distress emerged.
- Participants were provided with relevant support resources when appropriate; however, the study did not provide clinical treatment, crisis counseling, or case management.

Qualitative Analysis & Interpretation



A structured, multi-stage thematic-analysis process supported the development, testing, and refinement of the study's findings and recommendations.

The research analysis team, consisting of three Technical Assent researchers and four WJI research partners, reviewed all 43 interview and focus group transcripts for accuracy and de-identified them before analysis. The team supported consistency through independent coding of an initial subset of transcripts and codebook calibration, using a draft codebook grounded in the research questions and semi-structured guides. Two team members independently coded an initial subset of transcripts to calibrate code application and compare discrepancies, resulting in refinement of the code definitions before the team continued analysis.

One to two team members then manually coded transcripts in Dovetail. The team assessed thematic saturation through ongoing comparison of newly coded transcripts against the developing codebook and thematic framework. Coding continued until successive transcripts no longer produced substantively new codes, themes, or meaningful variations relevant to the research questions. Based on this assessment, formal thematic coding concluded after 31 of the 43 transcripts. The remaining 12 transcripts were reviewed against the established thematic framework to assess whether they introduced new themes, materially different perspectives, or contradictory evidence, but were not subjected to full line-by-line coding.

Team members compared evidence across Veteran interviews and stakeholder focus groups, refined codes and themes, and identified recurring patterns, contrasting experiences, substantively important

individual accounts, and areas where evidence remained limited or insufficient. Regular analytic debriefs strengthened coding consistency and theme development. Team members compared interpretations, reconciled coding and thematic differences through consensus-based discussion and documented key analytic decisions.

The team compared the qualitative findings with stakeholder perspectives and relevant literature to identify convergence, divergence, and additional context. Veterans, WJI research partners, and CAB members then pressure-tested the findings through structured validation sessions. The team distinguished recurring evidence from mixed, limited, or illustrative evidence and retained contradictory and negative cases within the analyzed transcripts when those accounts qualified or challenged an emerging interpretation. The analysis team included both Veteran and non-Veteran researchers from Technical Assent and the William Joiner Institute.

This mixed composition, together with the debriefs, coding calibration, and validation practices described above, helped surface and challenge individual researcher assumptions so that interpretations reflected more than any single team member's perspective.

Treatment & Analysis of Identity Factors

Identity was examined as an exploratory, cross-cutting dimension of participants' gambling experiences, trust, and help-seeking.

Interview questions invited participants to reflect on whether and how aspects of their identity or background, including Veteran status, military-service history, age, race and ethnicity, gender, LGBTQ+ identity, geography, and socioeconomic circumstances, affected their relationship with gambling, willingness to seek help, or trust in services.

The research team reviewed identity-related content across Veteran interviews and stakeholder focus groups to identify recurring patterns, contrasting experiences, substantively important individual accounts, and areas where evidence was insufficient. Because the study used a purposive qualitative sample and several demographic subgroups included relatively small numbers of participants, the

analysis was not designed to produce representative comparisons across groups.

Identity-related findings are therefore presented according to the strength of the available evidence and are qualified where subgroup evidence was limited. The analysis did not treat identity characteristics as independent or causal factors and considered how demographic identities interacted with military service, deployment, transition, socioeconomic circumstances, and institutional experiences. The research team reviewed broader findings through validation sessions with Veterans, WJI research partners, and CAB members; however, the study did not conduct separate validation sessions for each demographic subgroup.

Community Capacity Building

To advance Aim 4, Technical Assent partnered with WJI and the CAB to strengthen research and design capacity within Massachusetts Veteran-serving communities. Capacity building occurred through formal training, guided practice, mentorship, and direct participation throughout Phase I.

WJI Research Partners

- Received access to a curated learning library and practical research resources
- Completed Technical Assent-led training in HCD, desktop and field research, interviewing, synthesis, and reporting
- Received ongoing coaching in literature review, study design, participant recruitment, qualitative data collection, coding, and synthesis
- Participated in interviews as observers and note takers
- Contributed to codebook refinement, theme development, validation, and review of the draft report

Community Advisory Board

- Received an orientation to HCD and CBPR
- Advised on study design, recruitment strategy, cultural relevance, and Veteran engagement
- Supported outreach and participant recruitment through trusted community networks
- Reviewed and validated emerging findings
- Provided feedback on the draft report and considerations for dissemination, sustainability, and future implementation



These activities built practical skills, strengthened community ownership of the research, and created a foundation for continued co-design, prototyping, and implementation in Phase II.

Veteran Recruitment Dispositions

The study used broad community, organizational, digital, and in-person outreach to identify Massachusetts Veterans who may have been eligible to participate. Interested individuals completed an initial eligibility screening, followed by secondary verification as needed before an interview was scheduled.

Disposition	Number	Description
Completed interview	43	Eligible participants who completed a semi-structured interview
Invited, no response	32	Eligible individuals who were invited to participate but did not respond after at least two follow-up contacts
Withdrew prior to interview	14	Individuals who withdrew before the scheduled interview began
Did not attend	6	Individuals who did not attend a scheduled interview
Other disposition	20	Individuals determined to be ineligible during secondary screening; this category also included suspected fraudulent responses
Total recorded dispositions	115	Individuals with a documented outcome in the Veteran recruitment tracker

These figures describe the outcomes recorded in the study's Veteran recruitment tracker. They should not be interpreted as a conventional recruitment funnel or used to calculate a response rate because:

- outreach was distributed through multiple organizations, community networks, digital channels, flyers, referrals, and in-person activities;
- the total number of individuals who encountered recruitment information could not be determined; and

- not every recorded individual progressed through the same scheduling stages (e.g., those recruited in person did participate in a separate scheduling step).

Accordingly, the counts reflect recorded recruitment dispositions, not the proportion of all Veterans reached who ultimately participated.

Veteran Interview Participant Characteristics (N=43)

Characteristic	n	%
Age		
18-29	4	9%
30-44	13	30%
45-59	14	33%
60+	12	28%
Gender		
Man	37	86%
Woman	6	14%
Race/Ethnicity*		
American Indian or Alaska Native	3	7%
Asian	2	5%
Black or African American	8	19%
Hispanic or Latino/a/x	3	9%
White	32	74%
Other	1	2%
Prefer Not to Say	1	2%
Socioeconomic Status		
Comfortable	20	47%
Meeting needs, but stressed	12	28%
Significant challenges	8	19%
Hard to meet needs	3	7%

Characteristic	n	%
Service Era (select all that apply)		
Post-9/11	24	56%
Gulf War	13	28%
Peacetime	5	12%
Vietnam War	4	9%
Other	2	5%
Combat Experience		
No combat experience	20	48%
Combat experience	18	43%
No response	4	9%
Problem Gambling Screen (BBGS)		
Screened positive	21	49%
Screened negative	22	51%
Gambling Frequency		
Daily	2	5%
Few times per week	12	28%
Weekly	4	9%
Monthly	13	30%
Infrequently	11	26%
No Response	1	2%

Characteristic	n	%
Types of Gambling*		
Lottery tickets	39	91%
Casino games	29	67%
Sports betting	18	42%
Bingo or raffles	18	42%
Private betting	16	37%
Online gambling	7	16%
Fantasy sports	6	14%
Horse or dog race betting	3	7%
Other	5	12%
Length of Military Service^		
Less than 3 years	6	16%
3-5 years	11	30%
6-9 years	7	19%
10-19 years	4	11%
20 or more years	9	24%

*Respondents selected all racial/ethnic categories and gambling categories that applied to them

^Length of military service was calculated from participants' reported military service start and separation dates. These screener questions were optional; 37 of 43 participants provided sufficient information for calculation.

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Acknowledgements

This study would not have been possible without the time, trust, and expertise of the many individuals and organizations who contributed to this work.

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 - Jeremy Rhodes

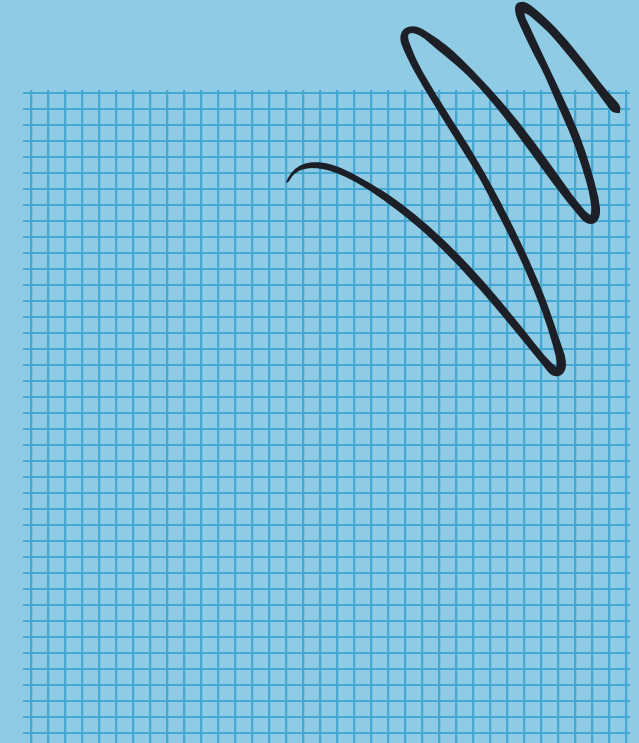
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Massachusetts Gaming Commission

Understanding Gambling & Help-Seeking Among Veterans

September 24, 2026



Presented by Emma Hersh, MPA
Technical Assent, LLC

Research Team: Taylor Goulbourne, PhD;
Emma Hersh, MPA; Suzanne Atchison, MA





Technical
Assent

Research Context & Methods

Why This Study

Gambling has become increasingly accessible in Massachusetts, particularly following the introduction of retail and mobile sports wagering in 2023, and gambling-related harm affects a meaningful subset of Massachusetts Veterans. Yet gambling-related concerns remain underrecognized within systems designed to support Veterans.

WHAT WE ALREADY KNEW

- Existing research — including MGC-funded work — confirms Veteran gambling-related harm is real and measurable, but is often overlooked in Veteran-serving communities and focuses on prevalence, not lived experience
- Screening is inconsistent across Veteran-serving systems, and awareness of gambling-specific resources is limited

WHAT REMAINED UNKNOWN

- **Lived Experience:** How gambling actually shows up in Veterans' day-to-day lives — and why it escalates for some but not others
- **Identity & Diversity:** How service history, identity, and geography shape risk and help-seeking
- **Trust & Disclosure:** What blocks disclosure, and what kinds of support Veterans would trust and use

This study brings together the voices of 43 Massachusetts Veterans, 10 Veteran-serving stakeholders, and a 10-member Community Advisory Board to close that gap.

Veterans in Massachusetts Carry a Disproportionate Burden of Gambling-Related Harm

- ~8% of the U.S. Veteran and military populations experience problem gambling compared with 1.4% among adults overall
- Active duty service members have 2x+ the adjusted odds of elevated gambling severity compared to civilians
- At-risk or problem gambling among Veterans is associated with PTSD, depression, substance use, trauma, and homelessness, with risk further shaped by post-deployment adjustment, stressful life events, and low social support

Veterans represent **20.6%** of Massachusetts' problem gamblers, but just **3.7%** of the population.

These figures establish scale but not cause. This study was designed to directly address that gap — through the voices of Veterans themselves.

Research Design & Community Partnership

Four research aims, a rigorous qualitative design, and a community-embedded partnership shaped how this study examined gambling's impact on Massachusetts Veterans.

What We Set Out To Do

Well-being: Examine how gambling affects Veterans' financial, social, and emotional welfare

Identity: Explore how age, race/ethnicity, LGBTQ+ identity, and service history influence vulnerability, resilience, and trust

Trust & Engagement*: Identify strategies that foster trust and engagement across Veteran communities

Sustainable Capacity*: Build lasting research and design capacity in Veteran-serving communities

How We Did It

Sample: 43 in-depth Veteran interviews; two stakeholder focus groups (10 participants)

Recruitment: Engagement with WJI and our Community Advisory Board, VSOs, Veteran-serving organizations, the Massachusetts Lottery, and digital outreach

Data Collection: IRB-approved semi-structured guides; sessions audio-recorded and transcribed

Analysis: Structured thematic coding to saturation, validated with Veterans and community partners

Who We Partnered With

Academic Partner: UMass Boston's William Joiner Institute (WJI) provided PhD-level advisory support and Veteran research assistants

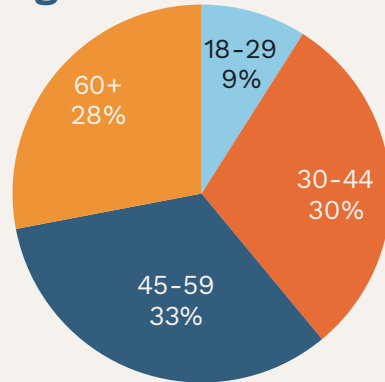
Community Advisory Board: 10 members spanning clinical, public health, policy, Veteran-service, and academic expertise, engaged from design, through validation

**Advanced further in Phase II*

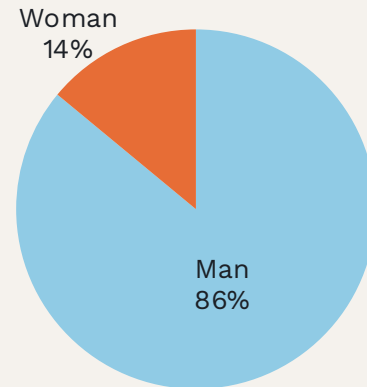
Engaging a Diverse Range of Veterans

This study engaged 43 Massachusetts Veterans through in-depth individual interviews. We recruited participants from across the state, representing a diverse range of military backgrounds, demographics, life experiences, and relationships with gambling.

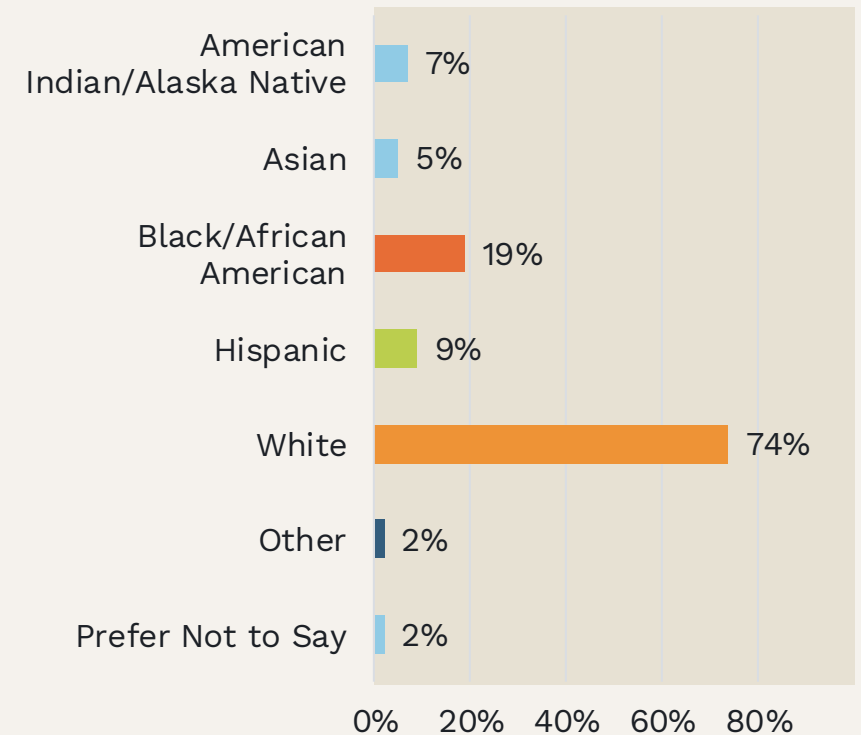
Age



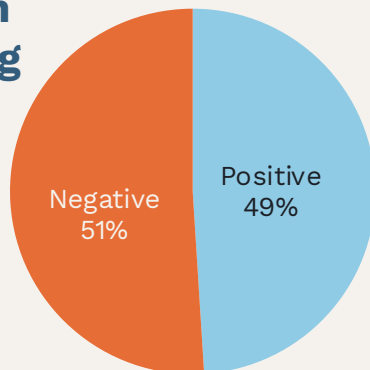
Gender Identity



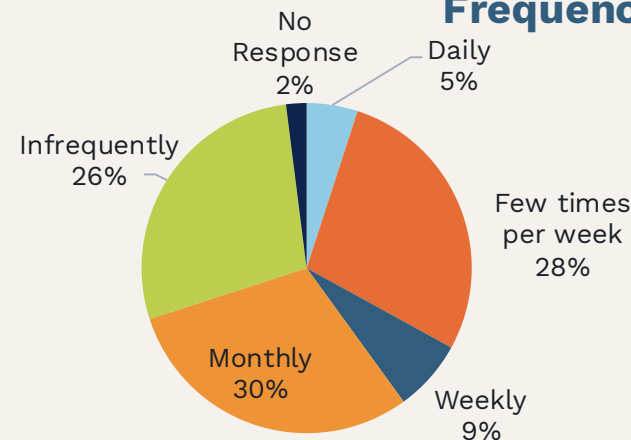
Race/Ethnicity[^]



Problem Gambling Screen (BBGS)



Gambling Frequency



[^]Respondents selected all racial/ethnic categories that applied to them.

Findings

Summary of Key Findings

Across 43 interviews and two focus groups, four themes emerged that together explain why gambling-related harm among Massachusetts Veterans often goes unaddressed and what it will take to change that.

1. Veteran Gambling Occurs in a Different Context than the General Population. Military culture normalizes gambling and discourages disclosure.

“ [When I'm deployed,] I'm always going to have a house. I'm always going to have food. So, it was easier to...continue gambling and maybe increase the betting. More risk; more gain.

3. Veterans Use Self-Directed, Relational, and Indirect Pathways to Manage Gambling. Veterans lean on personal guardrails and peer relationships far more than gambling-specific services.

“ I'll delete it off my phone and then something will come up. I'll be like, 'okay, let me download it' and then I'll just pour a couple hundred dollars into it until I say, 'you know what, I need to get this off my phone again.'” — Veteran

2. Gambling Affects Veterans' Lives in a Less Visible Way. Financial harm is visible; the shame-driven social and emotional toll often is not and is harder to recover from.

“ There's a lot of shame involved... the loss of income, the loss of self-esteem, the loss of motivation, the manipulation.

4. Bridges Already Exist to Reach Massachusetts Veterans, but Coordination is Needed. Veterans aren't hard to reach; they're under-reached. The infrastructure, trusted messengers, and natural touchpoints exist, but the coordination does not.

“ I know when I'm not doing well, whether that's financially or mentally or whatever it may be, it's a lot easier to admit that if a person asks me than for me to go and ask for that help myself.

The findings in this presentation reflect the varied experiences of study participants, not all Veterans.

What Makes Veterans' Relationship with Gambling Distinct

Veterans gamble for many of the same reasons as everyone else — connection, stress relief, financial hope, excitement. What's different is the context: a military culture that normalizes gambling and discourages disclosure, deployment conditions that make financial risk feel low-stakes, a transition period that concentrates multiple risk factors at once, and, for some, a monthly VA compensation cycle that can activate gambling on a recurring basis.

+ + +

Military culture can normalize gambling while suppressing disclosure

- Gambling was often just part of active-duty life — barracks card games, casino trips near duty stations, deployment downtime — normalized rather than flagged as risky.
- That same culture discourages help-seeking: expectations of toughness and self-reliance make acknowledging a problem feel incompatible with military identity.
- For service members in security clearance-dependent roles, disclosure can carry real professional risk — financial instability can jeopardize a clearance, adding a structural barrier beyond shame.

What We Heard

“I was stationed in eastern Connecticut, about 20 minutes from the largest casino in America...for nine out of my 10 years. We would go to the casino on the weekends. That's what we did.” –Veteran

“In my military experience, there was a huge stigma around getting help. There were multiple times my [fellow soldiers] went to get help and were penalized for it.” –Veteran

“A big stigma comes from that community, because certain military occupations require security clearances, and if there's a fiscal instability in that individual's life, that clearance can get pulled, and then they lose their jobs, so it spirals really, really quickly.”
–Veteran Service Officer (Focus Group Participant)

+ + +

The transition out of service represents a particularly high-risk window

- Leaving service removes what made gambling feel low-stakes — steady income, housing, structure, and social connection — while introducing new financial pressure.
- Veterans described depleting deployment earnings, gambling more as financial strain intensified, and struggling with the loss of identity and purpose that service had provided.
- Both Veterans and Veteran-serving stakeholders named this transition window as one of the clearest opportunities to intervene.

What We Heard

“You're sending them home like, ‘here's 30 days of your medicine and your DD-214... you'll figure it out.’”

–Veteran

“After I got out of the military, I definitely was gambling a lot. I would never ask [for] money to gamble, but what I would do is I'd gamble all my money away and then ask my friends for loans to get me through eating and stuff like that.” –Veteran

“You lose a sense of purpose. You lose a sense of meaning and importance. When I was in the military, I was the head honcho. And then when you get out, you're a civilian [but] not a lot of people understand your skills or experience that you bring to the table.”

–Veteran

+ + +

Monthly VA compensation checks can create a recurring gambling activator post-service

- For Veterans receiving VA disability or pension payments, the monthly cycle can create a pattern: a temporary sense of financial security drives increased gambling, followed by rapid depletion.
- Disability rating reductions can trigger the same pattern in reverse: financial pressure driving gambling to replace lost income.
- For some, gambling becomes tied to the rhythm of the payment cycle itself, not just financial need.

What We Heard

“When I first get my check, it's like you got extra money, so it's almost like you feel like king for a day. So, you just get whatever you want ...for a day. And so, buying more scratch tickets is a part of that. It's like an upgrade.” –Veteran

“My big trigger is always the beginning of the month when I get my money.” –Veteran

“When we give out our checks, I would see Veterans with their front pocket completely bulg[ing] with scratch tickets...their whole check would pretty much go.” –Veteran Service Officer (Focus Group Participant)

How Gambling-Related Harm Affects Veterans' Financial, Social, and Emotional Well-Being

For many Veterans in this study, gambling remained recreational or manageable. But for those whose gambling escalated, the effects extended beyond financial loss — to relationships, emotional well-being, housing stability, and willingness to seek help. Much of this harm is shaped by Veteran-specific circumstances: military norms of self-reliance, transition-related disruption, and limited awareness of gambling-specific support.

+ + +

Gambling-related concerns often remain undisclosed across support settings

- Nearly every participant had never been asked about gambling by a VA provider, VSO, or clinician — not because they refused, but because the question never came up.
- Trust in Veteran-serving systems is personal, not institutional: many trust an individual provider or peer while staying skeptical of the larger organization.
- For Veterans who've watched benefits or policies shift without notice, that distrust runs deeper. Gambling becomes one of the last things disclosed until a crisis forces it.

What We Heard

“I had never mentioned about my gambling problem to someone other than my spouse. Even though I've had mental therapy through the VA, I actually never mentioned about the gambling problem.” –Veteran

“I've never heard anything specific to gambling problems for Veterans.” –Veteran

“I think that [asking about gambling] is something I want to incorporate into my conversation when I'm meeting clients and Veterans for the first time because of this discussion, so thank you for having me on.”
–Veteran Service Officer (Focus Group Participant)

How Veterans Manage Gambling through Self-Directed, Relational, and Indirect Pathways

Veterans described several pathways that help keep gambling within limits or reduce harm once those limits start to erode: self-directed strategies like spending caps and app deletion, relational supports like partner or peer accountability, and indirect pathways through treatment for co-occurring conditions like depression or PTSD. Most relied on these personal strategies rather than gambling-specific services — often because those services were unfamiliar, unavailable, or didn't feel like a natural source of support.

+ + +

Social support is the protective factor Veterans described most often

- The most meaningful protection often wasn't a program — it was a person: a sponsor, partner, or fellow Veteran who noticed and showed up.
- Veterans consistently described greater trust in people who had "been through it" — shared experience reduced the need to explain themselves.
- That protection depended on the relationship feeling authentic; support that felt superficial or purely institutional didn't provide the same anchor.

What We Heard

"To me, the opposite of addiction is connection. Now when I have an addictive thought, I've got a sponsor. I've got a place to go to make a telephone call to somebody that's gonna listen to me and give me good advice. If I didn't have that connection, there's a lot of times in this world I would have slipped up."

–Veteran

"I would say I found the perfect partner to give me a slap in the face every now and then, just having control of my finances. I am definitely not good in controlling my finances." –Veteran

"I'd rather talk to somebody that's been through it [military service], and if they've been through it, obviously I'm going to listen more." –Veteran

What It Takes to Reach Veterans

Participants and stakeholders were consistent: Veterans aren't a hard-to-reach population — they're an under-reached one. The infrastructure, trusted messengers, and natural touchpoints already exist. What's missing is coordination, intentional outreach, and follow-through. Veterans have also watched agencies come in, gather information, and disappear without results — so any effort to reach them must be built on consistency, not just good intentions.

+ + +

Veteran identity is a point of pride and connection, but reaching Veterans means engaging the whole person

- Shared military service is a powerful lever for trust and connection — many participants said they were more comfortable with someone who understood military culture.
- The Veteran community isn't monolithic: women Veterans, LGBTQ+ Veterans, and Veterans of color described navigating spaces not built with them in mind.
- For some participants, being a Veteran had no bearing on their gambling or help-seeking at all; service was one chapter of a larger life, not a defining identity.

What We Heard

“I'll walk down the hall [at VA] and I'll be asked questions like, ‘What's your sponsor's Social Security number?’ I'm like, ‘I don't have a sponsor. I have my own Social Security number. I served.’” –Veteran

“‘Veteran’ is just one of many hats that people wear. They might be mothers or fathers, or maybe Latino or Black or queer. And those identities also matter just as much as the Veteran identity.” –Veteran

“[Being a Veteran] is a piece of their identity that carries through all different parts of their life, whether it's a new occupation, their role in their family, different decades, and stages ... of life.”
–Clinical Program Manager (Focus Group Participant)

+ + +

Trust depends on known relationships, transparency, and clear pathways to support

Veteran trust in support systems generally reflected three orientations:

- **Interpersonal over Institutional:** Many participants trusted an individual provider, clinician, peer, or Veteran Service Officer while remaining skeptical of the larger organization.
- **Community over Institutional:** Some placed greater trust in community-based organizations that offer personal relationships, continuity, and local accountability.
- **Pragmatic Access:** Others were open to formal services but lacked awareness of available resources or a clear route into support.

What We Heard

“I got trust with the individual that is my doctor, but not in the larger organization.” –Veteran

“I would put more trust in community-based groups than I would in the VA, mostly just because government funding is subject to the whims of whatever Congress and/or the president [decide] at any given moment... especially in my circumstance, like there's a political agenda [about] trans folk, unfortunately. And I've seen benefits get taken away in my lifetime.” –Veteran

“Anybody working with Veterans should be culturally aware of military culture [and] expect that there is going to be a higher level of mistrust. You are going to have to work harder to gain that trust...maybe versus other populations.” –Clinical Program Manager (Focus Group Participant)

+ + +

Effective support is peer-led & community-embedded

Veterans trust people, not new programs — effective support taps into networks they already use:

- **Leveraging Existing Networks:** Distribute support through the VSOs, peer groups, and community organizations Veterans already trust.
- **Prioritizing Lived Experience:** Offer peer support. Veterans prefer someone who's "been through it."
- **Offering Flexible Engagement:** Meet Veterans where they are — online, phone, or informal settings.
- **Using Financial Literacy as a Gateway:** Budgeting conversations with case managers or VSOs are practical, low-barrier entry points.
- **Using Social Gambling Settings for Low-Stigma Outreach:** Use the sports pools, raffles, and community events Veterans already attend for brief education and peer outreach.

What We Heard

"[It's] essential, crucial. Why would I talk to a non-Veteran person about gambling problems or addiction? I wouldn't do it." –Veteran

"I'd probably feel more comfortable reaching out if there were online resources versus just going in person. I feel like a lot of times the Veteran won't go because they have to go somewhere and then go talk about it." –Veteran

"We try to work on a peer specialist or peer support kind of model as best we can. We find that it can be really helpful with breaking down the barriers."
–Clinical Program Manager (Focus Group Participant)



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Solution Design Considerations

Insights & Solution Design Considerations



Each insight is grounded in what Veterans, practitioners, and the literature tell us about where the broader support ecosystem is falling short, and each design consideration points to a concrete, achievable next step for consideration.

Insight	Solution Design Considerations
Gambling-related harm among Veterans often goes undetected, but existing systems are well positioned to change that. Most participants had never been asked about gambling by VA providers, VSOs, or other Veteran-serving professionals, even when they regularly interacted with these systems.	Integrate gambling screening into VA appointments, primary care visits, and touchpoints with community organizations (e.g., VSOs and nonprofits), and equip those systems to recognize and respond to gambling-related harm.
Veterans facing gambling-related harm need confidential, low-risk pathways to disclose and seek help. Military norms of self-reliance and emotional suppression, compounded by shame and professional or financial risk, can make disclosure and help-seeking feel unsafe.	Offer confidential, low-barrier pathways to care that prioritize psychological safety and reduce immediate career or security-clearance repercussions.
The service member-to-Veteran journey creates predictable windows of gambling risk and opportunities to intervene. From barracks card games to deployment earnings and monthly VA compensation, participants described recurring moments of elevated gambling risk.	Target outreach and prevention at the moments of highest risk, including during service, at transition, and near VA compensation disbursements.
Gambling often functions as a response to underlying distress; care for co-occurring conditions can help manage it. Participants frequently described gambling as a way to cope with emotional pain, mental health conditions, substance use, or financial distress.	Embed support into mental health, substance use, and financial counseling pathways so holistic care plans account for gambling-related harm as an expression of broader psychological or financial distress.
Credible engagement depends on identity-responsive, peer-led, and community-engaged outreach. Veterans were more likely to engage through trusted peers, credible community organizations, and programs that reflected their identities and experiences.	Invest in peer-led, community-based programming and harm-reduction messaging delivered by trusted messengers, designed to reflect Veterans' diversity and provide transparent, no-fee, safe, and inclusive pathways to engagement.

Summary of Next Steps (Phase II)

Phase II will translate the Phase I findings into community-validated recommendations, tested solution concepts, and practical implementation guidance.

IMAGINE

Community Validation, Recommendation Development & Solution Co-Design

- Validate and prioritize the five Phase I solution design considerations
- Co-design potential solutions with Veterans and community partners
- Develop the initial community-validated report of recommendations

MAKE

Prototyping & Testing

- Develop and test up to two medium-fidelity prototypes
- Assess clarity, cultural relevance, trustworthiness, usability, and feasibility
- Refine selected concepts for pilot implementation

BRIDGE

Pilot Implementation & Evaluation

- Pilot and evaluate at least one prototype with up to two partner organizations
- Refine the solution and supporting implementation materials
- Finalize recommendations and implementation guidance
- Disseminate findings and co-developed resources

Phase II Outputs

1. Community-validated report of recommendations
2. Up to two tested prototypes
3. Pilot findings
4. Implementation, sustainability, and knowledge transfer guidance

Acknowledgements

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

FROM: Griffin Miniutti – Compliance Officer II, Sports Wagering

MEMO **MEETING**
DATE: 9/16/2026 **DATE:** 9/24/2026

RE: Update to Bally Bet House Rules

REGULATION BACKGROUND:

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

EXECUTIVE SUMMARY:

Bally Bet has submitted revisions to their Massachusetts online House Rules. A detailed summary of the latest updates and additions can be found in the attached redline exhibit. Please note that the exhibit consists of excerpts from the Operator's redline submission only where changes have been made, with some unaltered portions included for context as necessary.

The summary of changes is as follows:

1. **General Betting Rules:** Language under "Betting Props" and "Result Settlement" has been revised to enhance clarity.
2. **Football:** New language added to further outline the settlement policy for certain touchdown markets.
3. **Australian Rules Football:** Revisions made to reflect updated rules within the sport and expand settlement policy for milestone player offers.
4. **Baseball:** New language added to reflect changes in settlement logic related to suspended games and the mercy rule. Revisions made to existing language to enhance clarity.
5. **Cycling:** Section heading revised to reflect the consolidation of Cyclo-Cross house rules.



6. **Soccer:** References to markets not available in MA removed, and existing language revised to enhance clarity.
7. **Rugby League:** The “Try Scorers” market language has been revised to further outline the refund policy.
8. **Mixed Martial Arts:** New language added to explicitly reference applicable exceptions.

CONCLUDING STATEMENT:

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

Exhibit

Revisions:

GENERAL RULES

BETTING PROPS

- (b) ~~"Grand Salami" is where~~ It is possible to bet on the total number of listed occurrences (Example: Total Goals, Total Runs) happening in a collection of matches/events on a specified round/day/match day. All relative matches/events must be completed for bets to stand except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.

RESULT SETTLEMENT

- (i) Bets on events that are cancelled, postponed or rescheduled more than 12 hours beyond their official start time will be void, unless otherwise specified in sport-specific rules or the specific bet offer. However, bets will remain valid under the following exceptions:
- The Event did not have an official start time confirmed by the relevant governing body at the time of bet placement.
 - Event is rescheduled for ~~logistical or~~ broadcast reasons but remains within the same competition round and the sequence of official fixtures for all participants remains unchanged.
 - The start time is ~~advanced~~ brought forward to an earlier time, but the math still occurs within the same round, and the order of official fixtures is preserved. Past-posting and similar cancellation occurrences as defined in Section II(A)(6)(d) still apply.

SPORT SPECIFIC RULES

FOOTBALL

- (x) For First / Last Touchdown offers, bets are settled based on the player who scores the first or last touchdown of the game, as applicable.

If no touchdowns are scored during the game, wagers placed on the "No Touchdown" selection will be settled as winners and all other bets will be settled as losers.

Only touchdowns count for settlement purposes. All other scoring methods (including field goals, safeties, defensive two-point conversions, or any non-touchdown scores) are not considered.

AUSTRALIAN RULES FOOTBALL

- (c) For any Offer referring to individual player performances' in a single match (example: ~~Total Points Scored by Player X~~ First Goal Scorer) stakes will be refunded, if the player is not in the starting ~~22-23~~. For any offer between two players (head-to-head matchups) stakes will be refunded if either player is not in the starting ~~22-23~~. In addition, only for any milestone player offer (example: Player to get X Disposals / Goals / Behinds / Tackles / Marks), stakes will be refunded if the "Time on Ground %" is less than 40% as per the official match result. Should the outcome of such offers have already been decided, these milestone offers will be settled accordingly.
- (d) First Goalscorer in the match/1st Quarter – Bets will be voided on players who are not in the starting ~~22-23~~. Bets on First Goalscorer in the match, do not require the goal to be scored in the 1st Quarter. Should no goal be scored in the listed period, all bets will be settled as void, unless an option for "no goal" has been offered.

BASEBALL

- (c) Should a match start and be suspended due to weather or any other cause, and continued within the next 48 hours following original start time while remaining the next scheduled official match for all participating teams, then bets will remain valid and settled according to the eventual final official results. Otherwise, abandonment rules as defined in Section II(B)(5)(g) will apply. Any bet offer for which a result is already determined prior to suspension, and the outcome of which could not possibly change by any subsequent play will be settled according to the decided outcome.
- (d) "Handicap", "Over/Under", "Odd/Even" and all other markets, including player performance markets, but except Moneyline require all scheduled innings to be completed, or at least 8.5 innings to be completed if the home team is in advantage, for bets to stand. This applies to all offers except those the outcome of which has been decided prior to the abandonment and could not possibly be changed regardless of future events. These will be settled according to the decided outcome. For NCAA, exceptions will be made for matches that are shortened by mutual agreement of the opposing head coaches and referee or any "Mercy Rules" which come into play as stipulated by the relevant governing body. In case "Mercy Rules" are invoked, specified offers all bets will stand and will be settled as follows: according to the results and statistics at the time of the "Mercy Rule" call.

- (n) Series winner results are settled according to which team wins most matches in the series of matches (including any doubleheaders) ~~playing within beginning on the listed timeframe date~~. Bets void if teams win the same number of matches. ~~Should any match All-scheduled matches must~~ be rescheduled outside of the original dates ~~completed as per the rules of the governing body for series~~, bets ~~to stand except for those~~ will be void unless the ~~outcomes of which have been decided prior to the abandonment and~~ result of that match could not possibly ~~have be changed regardless of future events, which will be settled according to the decided~~ the outcome of the series winner.

CYCLING (ROAD & TRACK) AND CYCLO CROSS

- (a) Settlement of offers will be based upon the rider/team achieving the highest position at the end of the stage/event.
- (b) The decisive factor in settling bets will be the highest placing in the specified event as listed by the official organisation at the time of the podium presentation, disregarding subsequent disqualifications, changes to the official result, etc.

CYCLO-CROSS

- ~~(a) Terms and conditions stated for Cycling apply where applicable.~~

SOCCER

- ~~(e) On all bets related to yellow/red cards, booking points, etc., only cards shown to players which at that moment are on the pitch are valid for settlement purposes. Cards, disciplinary actions, suspensions, imposed on any other individual which at the moment of the sanction is not, or should not, be actively playing on the pitch, as well as disciplinary measures taken after the game has officially ended, are disregarded.~~
- ~~(f) Unless otherwise specified, or indicated in conjunction with the bet offer, all disciplinary-related bets placed before match start referring to individual(s) (e.g. yellow card, red card, number of fouls), require the listed player(s) to play from the start of the match to be valid. Similar type of bets placed after the relevant match has started will be settled as void should the listed player(s) not take any further part in the match for whatever reason after bet acceptance.~~
- ~~(g) "Booking Points" are calculated according to the following rules: Yellow card = 10 points, Red card = 25 points. Maximum points for one player are 35.~~

~~(h) For settlement purposes, markets referring to team to be shown the next Card (booking) and/or "Total Cards" will always consider a Red Card as 2 instances of a card being shown and will be settled accordingly. The following examples are being listed as a guideline:~~

- ~~• First card shown in a match is a straight Red Card. The team to which the card is awarded will be settled as the winning selection for the offers: Cards #1 and #2;~~
- ~~• First card shown in a match is a Yellow Card followed by a straight Red Card to the same player without a second yellow card being shown. The team to which the cards are awarded will be settled as the winning selection for the offers: Cards #1, #2 and #3;~~
- ~~• First card shown in a match is a Yellow Card followed by a second Yellow Card with the subsequent Red Card to the same player. The team to which the cards are awarded will be settled as the winning selection for the offers: Cards #1, #2 and #3.~~

~~(i) Markets referring to which specific player will be the next to be booked/receive a card are to be understood and settled as per the order of the instance in which each single player gets booked/sent off by the referee. The card colour shown by the referee will not be given any consideration in the settlement of this offer and the decisive criteria will always be the order in which the single player is considered to have gone into the referee's book. For settlement purposes it is possible for a single player to be listed twice as the "Next Carded player" as much as both bookings occur during different interruptions of play. Should 2 or more players be booked during the same interruption of play, bets on this offer will be settled as void.~~

(j) All bets referring to aggregated Tournament Totals (such as Goals, Corners, ~~Cards, Penalties,~~ etc.) will be settled based on official statistics by the governing body. Unless otherwise stated, cumulative amounts of such bets will include eventual prolongations (e.g. Extra Time) but not Penalty Shoot Outs.

(n) On offers such as Next ~~Player Occurrence~~ (Goalscorer, ~~Next Assist, etc.~~), ~~Player Occurrence during a specified interval~~ and Man of the Match, bets will be voided should the chosen player not take part in the match at all or had no possibility to accomplish such feat during the specified timeframe.

(s) Bets referring to penalty kicks conversion and/or outcome will be settled according to the outcome occurred on the field of play as per the rules governing that specific scenario and in cases of penalty shoot-outs will remain valid regardless of the format employed by the governing body during the shoot-out. Bets stand in case the penalty is ordered to be re-taken and will be settled with the outcome achieved from the re-taken penalty.

As a general principle, settlement will be based on the concept that unless the penalty kick results in a goal being awarded (and settled accordingly), the first person/object/location (as applicable) which the ball initially touches after being kicked will be considered as the winning outcome, disregarding any other persons/objects the ball hits in its subsequent trajectory following any previous deflection, if any. The following examples are being issued as a general guideline on settlement:

"Goal" would be the winning outcome in case of the following scored penalties scenarios:

- Any penalty kick which ends up as a goal without it being deflected;
- Goalkeeper touches the penalty kick but ball ends up as goal;
- Penalty kick touches the woodwork before ending up in goal.

"Save" would be the winning outcome in case of the following missed penalties scenarios:

- Goalkeeper deflects the penalty kick to outside the goal frame;
- Goalkeeper deflects the penalty kick onto the post/crossbar.

"Woodwork" would be the winning outcome in case of the following missed penalties scenarios:

- Penalty kick hits the woodwork before it is touched/saved by the goalkeeper;
- Penalty kick hits the woodwork and ball goes outside the goal frame.

"Any other Miss" would be the winning outcome in case of any penalty kick which without any deflection either by the goalkeeper or by the woodwork ends up outside the goal frame:

~~Exception to the above scenarios would be in~~ In case of penalty shoot-outs, should the ball hit the woodwork, bounce on the goalkeeper and end in goal, such penalty will be considered as having been scored while should said situation occur during any other part of the match which is not a penalty shoot-out, the penalty taker would be considered as having missed to score and "hitting the woodwork" will be considered as the winning outcome.

RUGBY LEAGUE

- (d) Try Scorers (First/Last/Anytime/Team) – All bets include any potential extra (over) time. ~~Any bets placed on players in the game day 17 stand regardless of the player's participation (or lack thereof) in the match. Stakes on players not included in game day 17~~ Stakes on players who do not take the field will be refunded. In addition, for any player milestone bet (example: Player to Score X or More Tries/Points) placed on NRL matches only, stakes will be refunded if the player is listed in the final starting 13 and does not officially play more than 30 minutes in the game. Should the outcome of such offers have already been decided, then these offers will be settled accordingly.

MIXED MARTIAL ARTS

- (c) **With the exception of the instances as detailed in Section II(C)(28)(d),** the addition or removal of title stipulations (example: a match initially announced as a non-title match gets changed into a title match) or changes in weight classes as well as either/both of the fighters fail to make the pre-established weight, will not result in the voiding of the offers as much as the fight takes place on the card it was announced for.



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

FROM: David Harrison – Compliance Officer II, Sports Wagering

MEETING: 09/24/2026

RE: Update to DraftKings House Rules

REGULATION BACKGROUND:

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

EXECUTIVE SUMMARY:

DraftKings has requested changes to their Massachusetts online sportsbook house rules. A full detailed summary of changes can be found in the attached redline exhibit.

The summary of changes is as follows:

- Language update to the definition of an “error”
- General rules section:
 - Clarification for “total points market”
- Football markets:
 - Added clarification for “D/ST” settlements in “Touchdown scorer markets”
 - Added clarification for “defensive statistics markets” in player prop markets under Market Specific Football Settlement Rules
 - Added section for Combined player performance markets – including but not limited to Player stack
 - Added language for clarification regarding player stacks in General football settlement rules
 - Removed wire-to-wire markets
- Addition of Football Moonshot section



Sports Wagering Division

- Baseball markets:
 - Updates to Race to X wins market within monthly special markets
 - Update to “next regular season wins markets” In future markets
- Basketball markets:
 - Added language for clarification regarding player stacks
 - Clarification that a made field goal will be deemed a dunk for settlement purposes
 - Revision of Head-2-head markets
 - Clarification for wire-to-wire winner markets
 - Revision to next field goal type and next field goal team markets
 - Added clarification for team next win/loss settlement
 - Added settlement clarification to regular season stat leader markets
 - Language update to player to reach milestone before, on or after X game and player to break record before, on or after X game markets
- Cricket markets:
 - Added settlement clarification for penalty runs in general cricket settlement rules
 - Added clarification to grouped over runs market
 - Revisions to fall of 1st/named wicket markets
 - Added settlement clarification to runs off delivery markets
 - Added settlement clarification in 1st innings lead markets
- Golf markets
 - Removed section in completed round markets for if the par of any hole of an event changes, bets placed before such change are settled based on the par of that hole will be voided and was added to Round markets section
 - Revision to day or session markets
- Motor Sports markets
 - Clarifying Revisions to section in General Motor sports settlement rules
 - Revisions to qualifications markets
- Soccer
 - Removal of player card markets for Soccer per MGC request
 - Addition of section for markets with multiple winning selections.
- Tennis
 - Revisions to player total games won market

CONCLUDING STATEMENT:

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

D. "Error" means any of the following:

- i. Any bet(s) accepted, settled, or otherwise resolved by DraftKings in violation of DraftKings' policies, controls, procedures, or limits that were only accepted, settled, or otherwise resolved by DraftKings due to, or as a result of human error or a technical or mechanical problem or issue on, or in connection with, the DraftKings Platform;

Total Points Markets, Total Goals Markets, and Total Runs Markets

Total Points Markets, which may also be referred to as Total Goals Markets or Total Runs Markets, depending on the sport, is a 2-Way market based on the total number of points, or goals, or runs, depending on the sport, scored in the applicable Event. The "Total" is set for the bet at a specific number with Selections for the bet as either "Over" or "Under" the Total number specified for the bet. If the total points, goals, or runs, as applicable, scored in the Event is equal to the specified Total for the bet, then the bet will be settled as Push. Totals Points Markets can also be set on any number of stated outcomes (for example only, Team Total Goals 1st Period, Team Total Corners – 1st Half, Rebounds O/U).

- National Football League ("NFL") Football Regular Teasers: the number of teams and the number of points selected determines the odds for the bet, in accordance with the below table:

	6 Point Adjustment	6.5 Point Adjustment	7 Point Adjustment
2 Teams	-135 (1.74 decimal odds)	-143 (1.70 decimal odds)	-150 (1.67 decimal odds)
3 Teams	+140 (2.40 decimal odds)	+130 (2.30 decimal odds)	+120 (2.20 decimal odds)
4 Teams	+240 (3.40 decimal odds)	+200 (3.00 decimal odds)	+180 (2.80 decimal odds)
5 Teams	+333 (4.33 decimal odds)	+290 (3.90 decimal odds)	+250 (3.50 decimal odds)
6 Teams	+500 (6.00 decimal odds)	+400 (5.00 decimal odds)	+350 (4.50 decimal odds)

- NFL Football Super Teasers: the odds of a Football Super Teaser are -143 (1.70 in decimal odds).
- NFL Football Monster Teasers: the odds of a Football Monster Teaser are -165 (1.61 in decimal odds).
- For all NFL Football Super and Monster Teasers bets, any bet that results in a tie or Push will be settled as lost.
- Any teaser containing both NFL and National Collegiate Athletic Association ("NCAA") football Selections will default to the lower-priced odds based on the number of teams and point adjustment selected. For example only, a 6 point adjustment 2 team teaser containing football teams from the NFL and NCAA will be priced at -135 (1.74 decimal odds) where 6 point 2 team NFL Football teasers are priced at -135 and 6 point 2 team NCAA Football teasers are priced at -115.
- Any bet that contains both NFL and NCAA Football Selections must apply the same point adjustment to all Selections. Mixed point adjustments (for example only, a 6 point NFL Football Selection combined with a 7 point NCAA Football Selection) are not permitted.
- NCAA Football Regular Teasers: the number of teams and the number of points selected determines the odds for the bet, in accordance with the below table:

	6 Point Adjustment	6.5 Point Adjustment	7 Point Adjustment
2 Teams	-115 (1.87 decimal odds)	-120 (1.83 decimal odds)	-125 (1.80 decimal odds)
3 Teams	+160 (2.60 decimal odds)	+150 (2.50 decimal odds)	+140 (2.40 decimal odds)
4 Teams	+260 (3.60 decimal odds)	+240 (3.40 decimal odds)	+230 (3.30 decimal odds)
5 Teams	+475 (5.75 decimal odds)	+425 (5.25 decimal odds)	+380 (4.80 decimal odds)
6 Teams	+750 (8.50 decimal odds)	+650 (7.50 decimal odds)	+600 (7.00 decimal odds)

- NCAA Football Super Teasers: the odds of a NCAA Football Super Teaser are -110 (1.91 in decimal odds).
- NCAA Football Monster Teasers: the odds of a NCAA Football Monster Teaser are -120 (1.83 in decimal odds).
- For all NCAA Super and Monster Teaser bets, any bet that results in a tie or Push will be settled as lost.

- Monthly Specials Markets
 - Markets will be settled based only on the statistics of the Games that start within the dates listed in the market title and Conclude by 3:00 am (local stadium time) on the day after the end date listed in the market title.
 - For the purpose of settling Race to X Wins Markets and Last Team to Lose Markets, if two or more qualifying Games start on the same date and Conclude before 3:00 am (local stadium time) on the day immediately after the start date of the qualifying Games, such Games will be considered to have Concluded on the calendar date such qualifying Games started for settlement purposes.

- Next Regular Season Win Markets – This market will be offered on which of a team's upcoming regular season Games will result in their next win. Selections for Games are listed and offered in the sequential order of the series (for example only, Game 1, vs BOS 4/1, Game 2 vs BOS 4/2, Game 3 vs BOS 4/3, etc.), and the designation of Games order (i.e., Game 1, Game 2, Game 3, etc.) is based on the originally scheduled sequence of Games as of the date the market opens. If the Game bet on does not proceed in the listed order or Conclude before 3:00 am (local stadium time) on the day immediately after the date such Game was scheduled to occur as of the date the market opens, all bets on that market will be voided unless settlement is already Unconditionally Determined (for example only, if Game 1 of the series is postponed and rescheduled to occur after Game 3, all bets for this market will be voided unless settlement is already Unconditionally Determined). For further example only, if Game 2 was scheduled to occur on April 17, but it instead Concludes at 2:00 pm (local stadium time) on April 18, bets for this market will be voided unless settlement is already Unconditionally Determined).

General Basketball Settlement Rules

- Except for bets on the "Under" Selection and except for bets where settlement is already Unconditionally Determined, bets on a single National Basketball Association ("NBA") regular season, NBA Cup, or NBA playoff Game that are accepted by DraftKings prior to the end of the first half of such Game and that are settled on the statistics recorded by a player based on the full time (including any overtime) of such Game will be voided if: (i) the player bet on does not Participate in the 2nd half of the Game, including any overtime, due to an injury; and (iii) before the end of the applicable Game, such player's team or the NBA releases an official statement stating that such player was injured during the Game. For clarity, this paragraph does not apply to bets with Selection(s) that are settled on the statistics recorded by players participating in different Games. This paragraph also does not apply to Combined Player Performance Markets (including, but not limited to, Player Stack).

Rules. For clarity, this paragraph does not apply to bets with Selection(s) that are settled on the statistics recorded by players participating in different Games.

- Except for 3-Way Moneyline Markets, 4th Quarter Player Points Markets, 4th Quarter/Moneyline Markets, and Games that are not tied but overtime is still played for aggregate scoring purposes, all bets include overtime statistics for settlement purposes. If a Game is not tied, but overtime is still played for aggregate scoring purposes, bets on such Game will exclude overtime statistics for settlement purposes.
- A successful free throw does not count as a field goal.
- A made field goal will be deemed a dunk for settlement purposes if classified as a dunk according to the Game's official box score of the Game's official governing body.

Market Specific Basketball Settlement Rules

- Player Props Markets
 - Combined Player Performance Markets – If "Under" is not a Selection, bets will be voided if: (i) the statistic applicable for the bet (for example only, x number of points) is not achieved and (ii) at least one of the players applicable to the bet did not Participate in the Event.
 - Combined Head-2-Head Markets – Settlement is based on the combined statistics of the listed Participants. For head-2-head markets involving a group of two or more Participants versus another group of two or more Participants, if one or more applicable Participants from only one group do not Participate in the Event, bets for this market will be voided unless the group with the non-Participating Participant(s) is the winning Selection based solely on the performance of its remaining Participant(s). In such case, bets on that winning Selection will be settled as won and bets on the other group of Participants will be settled as lost. If one or more applicable Participants from each group do not Participate, bets for this market will be voided.

- *1st Dunk Markets* – Settled on the player who records the 1st dunk in the Game. If a non-listed Selection records the 1st dunk in the Game, bets on the “Other” Selection will be settled as won, and bets on all other Selections will be settled as lost. If no dunk is recorded in the Game, all bets for this market will be voided. ~~A made field goal will be deemed a dunk for settlement purposes if classified as a dunk according to the Game’s official box score of the Game’s official governing body.~~ Bets for a Selection will be voided if such Selection does not start the applicable Game.

- *Wire to Wire Winner Markets* – For a team to lead wire to wire, such team must lead the Game at the end of each of the 1st, 2nd, and 3rd quarters each quarter, or 1st half if only halves are played in the Game, and also win the Game. If the Selection bet on does not lead the Game at the end of each of the 1st, 2nd, and 3rd quarters, or 1st half if only halves are played in the Game, or does not win the Game the bet is settled as lost. If the score of the Game is tied at the end of any of the 1st, 2nd, and 3rd quarters or 1st half if only halves are played in the Game, a team has not led the Game wire to wire.

- *Next Field Goal Type and Next Field Goal Team Markets* – If the score of the Game is incorrect at the time the bet was accepted by DraftKings, the bet will be voided. Settlement is based only on a successful field goal. A successful free throw does not count as a field goal. If the score of the Game listed for the market is never an official score during the Game per the Game’s official governing body, the bet will be voided.

- *Team Next Win/Loss* - If the Game specified for the bet is not Concluded on the date specified in the Selection, bets on such Selection will be voided.

- *Regular Season Stat Leaders Markets* (for example only, *Highest Average Points/Rebounds/Assists/Threes Made/Steals/Blocks per Game*) – The player bet on must satisfy the applicable official governing body’s statistical qualification minimums to be settled as the winner (for example only, a rule by the official governing body that a player must play at least 70% of their team’s games to be considered the highest scoring average leader). If a player bet on does not satisfy the applicable official governing body’s statistical qualification minimums, bets on that player will be settled as lost. If two players have the same rounded average as published by the league’s official governing body, the player’s non-rounded average, as determined by DraftKings’ calculations from the official statistics of the league’s governing body, will be used to break the tie. If a tie still remains, Dead Heat rules apply. These *Regular Season Stat Leaders Markets* rules shall apply to all *Team Specials Markets* involving a regular season statistics leader.

- Penalty runs added to a team's total after the conclusion of the innings will not count for settlement purposes ~~start of the other team's innings will not count towards settlement of markets in the previous innings.~~ Penalty runs awarded in an innings or added before an innings commences will count towards the innings they are added to for settlement purposes, unless otherwise stated in these Cricket Sport Rules.
- *Grouped Overs Runs Markets* – Predict how many runs will be scored in the specified number of overs. If the specified number of overs is not completed, bets on that Event will be voided, unless the team is all out, declares, reaches its target, or settlement is already Unconditionally Determined. Extras and penalty runs in the particular group of overs count towards runs for that group of overs for settlement purposes. In Limited Overs Matches, bets on a Match will be voided if it was not possible to complete at least 80% of the overs scheduled to have been bowled at the time the bet was accepted by DraftKings, due to external factors, including, but not limited to, bad weather, unless settlement is already Unconditionally Determined before the reduction of scheduled overs. In these cases, a new market may be created for the same group of overs. In drawn First Class Matches, bets on a Match will be voided if the number of overs specified for the bet in question is not completed, unless settlement is already Unconditionally Determined.
- *Fall of 1st/NamedNext Wicket Markets* – Predict whether the 1st or ~~next~~named wicket will fall before or after a specified number of runs has been scored. Settlement is based on the number of runs scored by the batting team at the point the specified wicket falls. If the innings reaches its intended end, including the completion of allotted overs, reaching the target, or a declaration, before the named wicket falls, the final score at the end of the innings will be used for settlement purposes for all current and future named wicket markets. If a batter retires hurt, all bets on that wicket will carry over to the next wicket until a wicket falls or the innings is completed. If the batting team reaches the end of its allotted overs, reaches its target, or declares before the specified wicket falls, the final score will be used for settlement purposes. If a batter retires hurt, all bets on that wicket are carried over onto the next partnership until a wicket falls. If a batter retires out on the wicket, all bets will be settled as normal.

- **Next Over Runs Markets** – Predict the total runs scored during the next over of the Match. If the specified over is not completed, bets on that over will be voided unless settlement is already Unconditionally Determined. If an innings ends during an over, then that over will be deemed to be complete for settlement purposes unless the innings is ended due to external factors, including, but not limited to, bad weather, in which case all bets will be voided unless settlement is already Unconditionally Determined. If the over does not commence for any reason, bets on such over will be voided. Extras and penalty runs in the particular over count as runs scored in that over of the Match for settlement purposes, unless penalty runs cause the innings or Match to end before a ball is bowled in the over, in which case bets on such over will be voided. Any penalty runs added prior to an innings commencing will not count for settlement purposes. If a run out occurs in the bowler's run up to end the Match, and no deliveries have been completed in that over, bets on that over will be voided.
- **Next Over Runs (5 Balls) Markets** – Predict the total runs scored during the next over (five balls) of a 100-Ball Match. If the specified over is not completed, bets on such over will be voided unless settlement is already Unconditionally Determined. If an innings ends during an over, then that over will be deemed to be complete for settlement purposes, unless the innings is ended due to external factors, including, but not limited to, bad weather, in which case bets on that over will be voided unless settlement is already Unconditionally Determined. If the over does not commence for any reason, bets will be voided. Extras and penalty runs in the particular over count towards runs scored in that over for settlement purposes, unless penalty runs cause the innings or Match end before a ball is bowled in the over, in which case bets on such over will be voided. Any penalty runs added prior to an innings commencing will not count for settlement purposes. If a run out occurs in the bowler's run up to end the Match, and no deliveries have been completed in that over, bets on such over will be voided.
- **Runs Off Delivery Markets** – The number of runs added to the team total, off the delivery specified for the bet, will be used for settlement purposes. All illegal balls count as deliveries for settlement purposes. For example only, if any over starts with a wide, then one run for the wide delivery will be the settlement for the 1st delivery, despite there being no legal ball bowled. The next ball will be deemed as delivery two for that over for settlement purposes. If a delivery leads to a free hit or a free hit is re-bowled because of an illegal delivery, the runs scored off the additional delivery do not count for settlement purposes. All runs, whether off the bat or not, are included for settlement purposes. For example only, a wide with three extra runs taken equates to four runs in total off that delivery for settlement purposes. Penalty runs which occur during the delivery count as runs scored off the delivery for settlement purposes. For example only, if the ball hits a fielder's helmet on the outfield (which results in five penalty runs) while the batters run one, this market would settle as six runs off that delivery. Any penalty runs added prior to an innings commencing will not count for settlement purposes.
- **A 50/100 Score in the Match Market** – Predict whether an individual player will score a 50/100 in the Match. Any individual player score of a 50 and above in the Match counts as a 50 for settlement purposes. Any individual player score of 100 and above in the Match counts as a 100 for settlement purposes. Predict whether there will be a 50/100 score in the Match. Any score of a 50 and above in the Match counts as a 50 for settlement purposes. Any score of 100 and above in the Match counts as a 100 for settlement purposes.
- **Limited Overs Matches (One Day Matches, Twenty20 Matches, T10 Matches, or 100-Ball Matches)** – If at least 80% of the scheduled overs are not completed in either innings of the Match due to external factors, including, but not limited to, bad weather, bets on such Match will be voided unless settlement is already Unconditionally Determined. ~~or goes on to be Unconditionally Determined before the reduction of the scheduled overs. Settlement will be considered Unconditionally Determined when both opening wickets in each innings of the Match have fallen or the result is known (i.e., the team batting 2nd has scored more runs than the 1st team's opening partnership score).~~

- *1st Innings Lead Markets* – If both teams in the Match don't complete their respective 1st innings, bets on such Match will be voided unless settlement is already Unconditionally Determined. If a team declares that innings will be considered complete for settlement purposes.

General Football Settlement Rules

- Except for bets on the "Under" Selection and except for bets where settlement is already Unconditionally Determined, bets on a single NFL regular season or NFL playoff Game that

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are accepted by DraftKings prior to the end of the first half of such Game and that are settled on the statistics recorded by a player based on the full time (including any overtime) of such Game will be voided if: (i) the player bet on does not Participate in the 2nd half of the Game, including any overtime, due to an injury; and (iii) before the end of the applicable Game, such player's team or the NFL releases an official statement stating that such player was injured during the Game. For clarity, this paragraph does not apply to bets with Selection(s) that are settled on the statistics recorded by players participating in different Games. This paragraph also does not apply to Combined Player Performance Markets (including, but not limited to, Player Stack).

Market Specific Football Settlement Rules

- *Player Props Markets*
 - *Touchdown Scorer Markets* – A touchdown scorer shall mean the player in possession of the football in the opposing team's end zone. A touchdown scorer is not the player who throws the touchdown (i.e., passing touchdowns do not count towards for settlement purposes for *Touchdown Scorer Markets*). If any player is not listed as a Selection at the time the bet was accepted by DraftKings and such player scores the touchdown or if a penalty touchdown is awarded, all bets will be settled as lost. For "D/ST" Selections, only touchdowns recorded by the Game's official governing body as "Defensive" or "Special Teams" touchdowns are considered D/ST touchdowns for settlement purposes. Touchdowns scored by the offense including, but not limited to, those scored on a blocked field goal, fake punt, or fake field goal which are not recorded as "Defensive" or "Special Teams" touchdowns by the Game's official governing body do not count as a defensive or special teams touchdown scored.

- *Defensive Statistics Markets* (for example only, *Player with the Most Tackles*, *Player with the Most Assists*, etc.) – Only defensive plays made by defensive players playing on the defensive side of the football when the football is snapped on that particular play are included for settlement purposes. Statistics from special teams plays, extra points, and 2-point conversions do not count for settlement purposes. For Tackles Markets, tackles refer strictly to solo tackles, and assisted tackles will not be counted for settlement purposes. For Tackles + Assisted Tackles Markets, solo tackles and assisted tackles will be counted for settlement purposes.

- *Combined Player Performance Markets (including, but not limited to, Player Stack)* – If “Under” is not a Selection, bets will be voided if: (i) the statistic applicable for the bet (for example only, x number of points) is not achieved and (ii) at least one of the players applicable to the bet did not Participate in the Event.

~~*Wire-to-Wire Markets* – For a team to lead wire to wire, such team must lead the Game at the end of each quarter, or half if only halves are played in the Game. If the score of the Game is tied at the end of any quarter or half, a team has not led the Game wire to wire. If the Selection bet on does not lead the Game at the end of each quarter, or half if only halves are played in the Game, the bet is settled as lost.~~

- **Moonshot**

- Moonshot is a football market that allows you to bet on what Actions (as defined below) will occur during a designated period of a Game (each period, a "Moonshot Round").
- A Moonshot bet will settle as won if the accumulated payout multiplier of in-Game Actions (defined below) meets or exceeds the target payout multiplier selected by you before a Terminating Event (defined below) occurs. For example only, if you set your target payout multiplier at 20x for your bet, and the Moonshot Round reaches a 20x or greater payout multiplier before a Terminating Event occurs, then your bet will be settled as won. If a Terminating Event occurs before the accumulated payout multiplier meets or exceeds the target payout multiplier selected by you, the bet will settle as lost.
- An "Action" or "Actions" means an eligible on-field outcome that is assigned a payout multiplier. Actions and their corresponding payout multiplier values are displayed in the applicable Moonshot market.
- A "Terminating Event" is defined as an incompletion, interception, fumble lost, turnover on downs, or safety that occurs only during a Qualifying Play (as defined below). If multiple turnovers occur on the same play, only the first offensive turnover is a Terminating Event and any subsequent happenings on that play do not impact the current or subsequent Moonshot Round.
- A "Qualifying Play" is defined as an offensive run or pass play that does not involve a kick, punt, extra point, or two-point conversion. A "Non-Qualifying Play" is defined as any play that is not a Qualifying Play. To avoid any doubt, a Non-Qualifying Play includes, but is not limited to, punts, field goal attempts, point after touchdown, two-point conversions, and kickoffs. A kicking or punt-related play becomes a Non-Qualifying Play once the ball is officially scored as being punted or kicked. If the ball is not punted or kicked on an apparent special teams play (either via an intentional fake punt or field goal or a broken play where the offensive team runs or passes the ball instead of kicking it) the play is defined as a Qualifying Play.
- No bets may be placed on a Moonshot Round that has begun. DraftKings may temporarily suspend wagering on an upcoming Moonshot Round while the ball is inside or on the opponent's 20-yard line.
- A Moonshot Round only begins on a Qualifying Play that is snapped from outside of the opponent's 20-yard line. Once a Moonshot Round begins, all Qualifying Plays during

the Moonshot Round count, including those snapped inside the opponent's 20-yard line.

- o In the event that after a Moonshot Round ends, but before the next Moonshot Round starts, a play begins at or within the opponents 20-yard line and results in an incompletion or turnover, all bets on the next Moonshot Round will be voided and stakes returned. For example only, Moonshot Round "1H – Before 5th Incompletion/TO" ends on an incompletion at the opponent's 15-yard line. The next snap does not begin the Moonshot Round "1H – Before 6th Incompletion/TO" because it is inside the opponent's 20-yard line. The next play is an incomplete pass. All wagers on Moonshot Round "1H – Before 6th Incompletion/TO" are voided and stake returned to customers because the applicable Moonshot Round never began and an incomplete pass occurred. The next Moonshot Round "1H – Before 7th Incompletion/TO" would then start with the first Qualifying Play outside of the opponent's 20-yard line.
- o If the applicable half, overtime period, or Game ends after a Moonshot Round has begun but before a Terminating Event has occurred, bets for that Moonshot Round are settled at the lesser of (a) the payout multiplier achieved in that Moonshot Round at the time the applicable half, overtime period, or Game concludes; and (b) your selected target payout multiplier. This settlement applies even if the achieved payout multiplier is less than 1.00x. If a Moonshot Round has not begun when the applicable half, overtime period, or Game concludes, all bets on that Moonshot Round will be voided. Moonshot Rounds do not carry over between halves or overtime periods. Any reference to an incompletion or turnover in a Moonshot Round market title refers only to the sequence of incompletions or turnovers occurring during the applicable half, with the count resetting at the beginning of each half.
- o A quarterback spike and quarterback kneel are both Qualifying Plays. A spike is an incomplete pass and a ~~kneel~~ is a rushing play.
- o A play nullified by an accepted penalty is a Non-Qualifying Play. However, if a penalty results in an offensive first down, even on a nullified play, that becomes a Qualifying Play and counts as a first down Action for multiplier purposes. If a penalty is declined and the play stands, the play will be graded based on the official statistics of the play. If a play stands but a penalty is also applied, then only official statistics count for the multiplier, including Terminating Events (for example only, a 5-yard run with a 15-yard face mask added to it only counts as a 5-yard run; the 15-yards from the penalty do not impact the multiplier).
- o Certain predefined Actions or events will trigger a "Bonus Multiplier," which doubles the payout multiplier value of subsequent Actions for the remainder of the active Moonshot Round until such Moonshot Round ends. Bonus Multipliers can apply multiple times during a single Moonshot Round and will reset at the start of each new Moonshot Round. A Bonus Multiplier is triggered in two ways: first, a Bonus Multiplier is triggered on the second Scoring Event (as defined below) of a Moonshot Round and upon each subsequent Scoring Event; and second, a Bonus Multiplier is triggered on the 10th Qualifying Play of a Moonshot Round and every fifth Qualifying Play thereafter (i.e., 15th Qualifying Play of a Moonshot Round, 20th Qualifying Play of a Moonshot Round, etc.).
- o A "Scoring Event" (for Bonus Multiplier purposes) is defined as a touchdown or a made field goal that occurs during a Moonshot Round. An extra point kick or two-point conversion after a touchdown is not considered a Scoring Event. A made field goal or a Touchdown scored on a Non-Qualifying Play (such as a kick or punt return) are both Scoring Events for the Bonus Multiplier, but do not ~~effect~~ the payout multiplier.
- o For clarity, Moonshot bets are subject to the Rules including, but not limited to, the DraftKings Cash Out rules.

- **Complete Round Markets**

- ~~If the par of any hole of an Event changes, bets placed before such change on markets that are settled based on the par of that hole will be voided.~~
- **Round Markets** – Statistics from any playoff holes do not count for settlement purposes. If the par of any hole of an applicable round changes, bets placed prior to the official announcement announcing the par change by the Event's official governing body will be voided unless settlement is Unconditionally Determined.
- **Day or Session Markets** – ~~Bets will be settled based on results of the match(es) on the day or session specified for the bet, not on any results from matches on any other day or session. If any match(es) do not Conclude within the day or session(s) specified for the bet, the results of such match(es) will still be attributed to that originally specified day or session(s) for settlement purposes. For example only, if a match scheduled for Day 1 begins on Day 1 but is delayed and instead Concludes on Day 2, such match will be attributed to Day 1 for settlement purposes.~~

General Motor Sports Settlement Rules

- All bets on an individual Motor Sports Race Events will be settled based on the first published provision results from the Race Event's official governing ~~body at the time of the Race's podium presentation~~. Any subsequent inquiries, penalties, or disqualifications after the publication of the first provisional results from the Event's official governing body ~~Race's podium presentation~~ will not affect settlement.
- **Qualification Markets** – ~~If the qualifying session does not reach its intended, natural, or normal end within 5 calendar days of the qualifying session's start date (local venue time), all bets on such qualifying markets will be voided. If the qualification session does not Conclude within 10 calendar days of the qualification session's start date (local venue time) that was officially scheduled at the time the bet was accepted by DraftKings, all bets on such qualification session will be voided unless settlement is already Unconditionally Determined.~~ If there was no officially scheduled start date for the qualification session at the time the bet was accepted by DraftKings, the first official start date for the qualification session announced by the qualification session's official governing body shall be deemed the officially scheduled start date at the time the bet was accepted by DraftKings for purposes of this rule.
- For markets with multiple winning Selections (for example only, Team To Reach the Last 32), bets on a Selection will not be voided solely because a non-listed player, team, or country is a winner in the applicable Event but cannot be listed as a Selection due to regulatory restrictions or requirements.

- ~~For Cards Markets, only cards shown to players playing in the Game count for settlement purposes, and no other cards to other individuals, including, but not limited to, managers, coaches, substituted out players, and players on the bench will count as a card for settlement purposes. Any card shown after the full time whistle has been blown will not count for settlement purposes. Both yellow and red cards count for settlement purposes.~~

~~○ **Player Cards Markets**—Predict which player will be carded either with a yellow card or with a red card during the applicable Event.~~

- ~~**Cards Markets**—Except for *Player Cards Markets*, bets are settled by the number and color of cards shown to each or both teams, as applicable; a yellow card counts as one point, and a red card counts as two points for settlement purposes. If a player receives two yellow cards, resulting in a red card, no points are counted for the 2nd yellow card for settlement purposes (i.e., a player will be counted as receiving one yellow card and one red card). The maximum number of points a player can accumulate during a Match for settlement purposes is three.~~

- ~~**1st Card and Last Card Markets**—If players from both teams are booked for the same incident in which the 1st or last card is received, bets on both teams will be voided.~~

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- ~~**Player Total Games Won Markets** – Bets are settled based on the number of games won by the specified player or team. If a Match does not reach its intended, natural, or normal end for any reason, including, but not limited to, a player or team in the Match retiring, withdrawing, forfeiting, or being disqualified from the Match, bets will only be settled if the outcome is already Unconditionally Determined at the time of stoppage. If the outcome is not yet Unconditionally Determined, all bets will be voided. For example only, a bet on "Under" 12.5 player total games won would be settled as lost if a Match is stopped with 13 or more games already won (for example only, 6-4, 4-6, 3-3). However, if fewer than 12.5 games have been won by the selected player at the time of stoppage (for example only, 6-3), the bet would be voided, as the outcome has not yet been Unconditionally Determined. If after the Event starts, a player or team retires, withdraws, forfeits, is disqualified, or otherwise similarly pulls out from or is eliminated from the Match, bets will be settled based on the number of games won at the time the player or team retires, withdraws, forfeits, is disqualified, or otherwise similarly pulls out from or is eliminated from the Match. For example only, a bet on under 12.5 total games won would be settled as lost if there was a retirement with the score 6-4 games after set one, 4-6 games after set two, and 3-3 games during set 3.~~



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

FROM: David Harrison – Compliance Officer II, Sports Wagering

MEETING: 9/24/2026

RE: Update to Plainridge Park Casino Sportsbook House Rules

REGULATION BACKGROUND:

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

EXECUTIVE SUMMARY:

Plainridge Park Casino Sportsbook (PPC) has requested changes to their Massachusetts online sportsbook house rules. A full detailed summary of changes can be found in the attached redline exhibit.

The summary of changes is as follows:

- Revision to numbering and section names to allocate for the removal of a section
 - Revisions to section references throughout the document
- Removal of Cylo Cross section and was added to Cycling section (Section 11)
- Addition of new section for “Non-sports/Special events”
- Various grammatical changes throughout the house rules for clarification
- Added “weather” to section 5.7 for clarification purposes. No changes to settlement logic
- Football
 - Removed terminology regarding penalty offers
 - Added clarification regarding first/last touchdown offers.
- Australian Rules Football
 - Added clarification to rule for player time on ground, change in settlement logic



Sports Wagering Division

- Australian Rules now has a starting 23 rather than 22, all references to 22 were changed to 23.
 - Removal of section 4.7 per Australia Football rules change, now covered under 4.3
- Baseball
 - Revisions to settlement logic for suspended games
 - Change in settlement logic for “Mercy Rule” in NCAA baseball
- Cricket
 - Removed reference language and added language for “Clause 1 of general cricket rules” throughout the Cricket section
- Soccer
 - Added clarification to avoid misinterpretation and align with current settlement logic
 - Added clarifying language for penalty kick scenarios
- Motor Sports
 - Changed Nascar to NASCAR (all caps)
- Rugby League
 - Revision of Try Scorers market due to change in sport rules
- Tennis and Raquet sports
 - Added example in the “Over/under” and “handicap” section
- Winter Sports
 - Added Bobsleigh and Skelton to list of quoted sports

CONCLUDING STATEMENT:

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

Section C - Sport Specific/Category Rules

1. Olympic and Championship events	2. Football	3. Athletics
4. Australian Rules Football	5. Baseball	6. Basketball
7. Beach Volleyball	8. Boxing	9. Cricket
10. Curling	11. Cycling (Road & Track) <u>and</u> <u>Cylo Cross</u>	12. <u>Cyelo-Cross Soccer</u>
13. <u>Seecer Golf</u>	14. <u>Golf Handball</u>	15. <u>Handball Ice Hockey</u>
16. <u>Ice Hockey Motor Sports</u>	17. <u>Motor Sports Netball</u>	18. <u>Netball Pesapallo (Finnish Baseball)</u>
19. <u>Pesäpallo (Finnish Baseball) Rugby League</u>	20. Rugby <u>League Union</u>	21. <u>Rugby Union Lacrosse</u>
22. <u>Lacrosse Speedway</u>	23. <u>Speedway Swimming</u>	24. <u>Swimming Tennis and Racket Sports (Badminton, Squash, & Table Tennis)</u>
25. <u>Tennis and Racket Sports (Badminton, Squash, & Table Tennis) Volleyball</u>	26. <u>Volleyball Winter Sports</u>	27. <u>Winter Sports Mixed Martial Arts</u>
28. <u>Mixed Martial Arts Snooker</u>	29. <u>Snooker Darts</u>	30. <u>Darts</u> 30. <u>Non Sports/Special Events</u>

13) Settlement of bets on offers such as "Man of the Match", "Most Valuable Player" etc. will be based on the competition's organisers'organizers' decision, unless otherwise stated.

- 2) a. Settlement of markets held over for more than 1 round/stage (E.g. Season Bets), will only consider amendments affecting bets for which settlement has not yet been decided. Such measures must be announced by the governing body before the last scheduled round/stage will to be considered. Any changes effected after this date, or else referring to bets which have already been settled based on events happening during the event/competition will not be considered.
- 7) Bets on events that are cancelled, postponed or rescheduled more than 12 hours beyond their official start time will be void, unless otherwise specified in sport-specific rules or the specific bet offer. However, bets will remain valid under the following exceptions:
- The event did not have an official start time confirmed by the relevant governing body at the time of bet placement.
 - The event is rescheduled for logistical weather or broadcast reasons but remains within the same competition round, and the sequence of official fixtures for all participants remains unchanged.
- 20) Unless specifically stated, whenever the organisingorganizing association deems it fit to include any necessary rounds, matches, or series of matches (e.g. Play-offs, Play-outs, Postseason) following the end of the so-called Regular Season in order to determine the classification, league winners, promotion/relegation, etc., The Sportsbook will take into account the results and outcomes deriving from these matches for settlement purposes of bets referring to the final league classification, promotion, relegation, etc.
For example, seasonal bets on the team winning the NHL will refer to the Stanley Cup Winners.

14) Settlement on all penalty offers will be based on the penalty being accepted. Declined penalties do not count.

22)23) For First / Last Touchdown offers, bets are settled based on the player who scores the first or last touchdown of the game, as applicable. If no touchdowns are scored during the game, wagers placed on the "No Touchdown" selection will be settled as winners and all other bets will be settled as losers. Only touchdowns count for settlement purposes. All other scoring methods (including field goals, safeties, defensive two-point conversions, or any non-touchdown scores) are not considered.

- 3) For any Offer referring to individual player performances in a single match (example: Total Points Scored by Player X Player to score X goals) stakes will be refunded, if the player is not in the starting 2223. For any offer between two players (head-to-head matchups) stakes will be refunded if either player is not in the starting 2223. In addition, for any player offer, stakes will be refunded if the "Time on Ground %" is less than 40% as per the official match result, unless the outcome of such offers has already been decided, in which case these offers will be settled accordingly.
- 4) First Goalscorer in the match/1st Quarter – Bets will be voided on players who are not in the starting 2223. Bets on First Goalscorer in the match, do not require the goal to be scored in the 1st Quarter. Should no goal be scored in the listed period, all bets will be settled as void, unless an option for "no goal" has been offered.
- 5) First Goalscorer in the 2nd, 3rd or 4th Quarter - All bets stand irrespective of the player's participation (or lack thereof) in the listed Quarter and the match. Should no goal be scored in the listed quarter all bets will be settled as void.
- 6) "Wire-to-Wire" betting refers to which team (if any) is leading the match at the end of each quarter.
- ~~7) All bets on a listed substitute will be Void irrespective of the actual outcome of the bet offer (e.g. "Anytime Goal Scorer").~~

42) Should a match start and be suspended due to weather or any other cause, and continued within the next 48 hours following the original start time while remaining the next scheduled official match for all participating teams, then bets will remain valid and settled according to the eventual final official results. Otherwise, abandonment rules as defined in <Section B, Para 5.5> will apply. Any bet offer for which a result is already determined prior to suspension, and the outcome of which could not possibly change by any subsequent play will be settled according to the decided outcome.

23) In the case of a shortened or abandoned match, "Match" bets (aka Moneyline) will be settled, as per the rules of the respective governing body. "Spread", "Over/Under", "Odd/Even" and all other markets, including player performance markets, but except Moneyline require all scheduled innings to be completed, or at least 8.5 innings to be completed if the home team is in advantage, for bets to stand. This applies to all offers except those the outcome of which has been decided prior to the abandonment and could not possibly be changed regardless of future events. These will be settled according to the decided outcome. For NCAA, exceptions will be made for matches that are shortened by mutual agreement of the opposing head coaches and referee or any "Mercy Rules" which come into play as stipulated by the relevant governing body. In case "Mercy Rules" are invoked, specified offers will be settled as follows: all bets will stand and will be settled according to the results and statistics at the time of the "Mercy Rule" call.

~~11)12)~~ Series winner results are settled according to which team wins most matches in the series of matches (including any doubleheaders) ~~playing within the listed timeframe beginning on the listed date. Bets void if teams win the same number of matches. All scheduled matches must be completed as per the rules of the governing body for bets to stand except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome. Should any match be rescheduled outside of the original dates of the series, bets will be void unless the result of that match could not possibly have changed the outcome of the series winner.~~

11) For "Total 4s/6s/Boundaries/Wickets" (Over/Under) betting, all bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the scheduled number of overs in the match at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers have already been decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.

Leg-bye and byes that reach/pass the boundary do not count towards total 4s/6s. Overthrows awarded to the batsman do count. Wides that reaches the boundary are not counted. No-balls that reach the boundary off the bat and are awarded to the batsman will be counted.

5) For "Most Points" betting, offers will be settled based on who has the most points awarded for the match (e.g. Sheffield Shield). In the event of a tie, if no draw price was offered, dead heat rules as explained in [Clause 1 of the General Cricket Rules will apply.](#) ~~<Section C, Para 10(a).1><.~~

6) "Highest Opening Partnership" bets require that both sides complete their opening partnerships ~~with the exception of those situations where an outcome has already been determined. Unless otherwise stated, highest opening partnership refers to the first innings of each team only. In the event of a tie, if no draw price was offered, dead heat rules as explained in~~ [Clause 1 of the General Cricket Rules will apply.](#) ~~<Section C, Para 10(a).1><.~~

11) For any betting involving "Session", the following definition of each session will apply to day matches.

- Day X, Session 1 (Start of play until Lunch is taken)
- Day X, Session 2 (Lunch until Tea is taken)
- Day X, Session 3 (Tea until stumps/close of play for the day)

The following definition of each session will apply [to day/night](#) matches.

- Day X, Session 1 (Start of play until tea is taken)
- Day X, Session 2 (Tea until dinner is taken)
- Day X, Session 3 (Dinner until stumps/close of play for the day)

13) For "Team to Lead after First Innings" betting, both teams are required to be bowled out or declare their first innings for bets to stand. In the event of a tie, if no draw price was offered, dead heat rules as explained in [Clause 1 of the General Cricket Rules shall apply.](#) ~~<Section C, Para 10(a).1><.~~

19) "Team of Top Run Scorer" betting will be settled of the top run scorer for either the 1st or 2nd innings of either team, i.e. the team of the highest individual run scorer in the match regardless of the overall match result. Bets will be void in drawn matches where the number of overs bowled is less than 200. In the event of a tie, if no draw price was offered, dead heat rules will apply as explained in [Clause 1 of the General Cricket Rules](#). ~~<Section C, Para 10(a).1>~~

e. Series/Tournament Betting

- 1) Should no draw odds be offered for a "Series Winner" bet and the series is drawn, all bets will be declared void, unless dead heat rule was specified (as explained in [Clause 1 of the General Cricket Rules](#)). ~~<Section C, Para 10(a).1>~~
- 2) If a tournament is not completed but a winner or winners are declared by the governing body, bets are paid on the winner(s) as declared. Dead heat rules as explained in [Clause 1 of the General Cricket Rules](#) ~~<Section C, Para 10(a).1>~~ might apply. Should no winner be declared then all bets will be settled as void.
- 3) All tournament betting includes Finals/Playoffs, unless otherwise stated.
- 4) For "Series Score" (Correct Series Score) betting, if for any reason the number of matches in a series is changed and does not reflect the number envisaged in the offer then all bets will be declared void.
- 5) For "Top Series Run Scorer/Wicket Taker" & "Top Tournament Batsman/Bowler" betting, where a tie occurs dead heat rules will apply as explained in [Clause 1 of the General Cricket Rules](#). ~~<Section C, Para 10(a).1>~~ No refunds will be issued on players not participating. At least one game must be completed in the tournament/series for [bets](#) to stand.

11. Cycling (Track & Road) and Cyclo Cross

~~12. Cyclo Cross~~

~~1) Terms and conditions stated for Cycling apply where applicable.~~

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- 14) On offers such as Next Goalscorer, Next Assist and Man Next Player Occurance (Goalscorer, Assist, ~~Carded Player~~, etc.), Player Occurance during a specified interval, and Man of the Match, bets will be voided should the chosen player not take part in the match at all or had no possibility to accomplish such feat during the specified timeframe.
- 15) Bets on "Next Assist" for a particular goal will be settled as void should the governing body declare the specified goal as having been unassisted, the specified goal is an own goal and/or no more goals are scored in the match during the specified timeframe.
- 16) Bets referring to penalty kicks conversion and/or outcome will be settled according to the outcome occurred on the field of play as per the rules governing that specific scenario and in case of penalty shoot-outs will remain valid regardless of the format employed by the governing body during the shoot-outs. Bets stand in case the penalty is ordered to be re-taken and will be settled with the outcome achieved from the re-taken penalty. As a general principle, settlement will be based on the concept that unless the penalty kick results in a goal being awarded (and settled accordingly), the first person/object/location (as applicable) which the ball initially touches after being kicked will be considered as the winning
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outcome, disregarding any other persons/objects the ball hits in its subsequent trajectory following any previous deflection, if any. The following examples are being issued as a general guideline on settlement:

"Goal" would be the winning outcome in case of the following scored penalties scenarios:

- Any penalty kick which ends up as a goal without it being deflected;
- Goalkeeper touches the penalty kick but ball ends up as a goal;
- Penalty kick touches the woodwork before ending up in goal.

"Save" would be the winning outcome in case of the following missed penalties scenarios:

- Goalkeeper deflects the penalty kick to outside the goal frame;
- Goalkeeper deflects the penalty kick onto the post/crossbar.

"Woodwork" would be the winning outcome in case of the following missed penalties scenarios:

- Penalty kick hits the woodwork before it is touched/saved by the Goalkeeper;
- Penalty kick hits the woodwork and the ball goes outside of the goal frame.

"Any Other Miss" would be the winning outcome in case of any penalty kick which without any deflection either by the Goalkeeper or Woodwork ends up outside the goal frame:

In case of penalty shoot-outs, should the ball hit the woodwork, bounce on the Goalkeeper and end up in the goal, such penalty will be considered as having been scored while should said situation occur during any other part of the match which is not a penalty shoot-out, the penalty taker would be considered as having missed to score and "hitting the woodwork" will be considered as the winning outcome.

- 3) Bet offers already decided are considered as valid bets even though 36 holes are not played and/or an official result has not been issued by the ~~organisation~~organization.
- 1) This section is valid for all sports related to Motor Racing, such as: Formula One, A1 GP, CART, Indy Car, ~~Nascar~~NASCAR, Circuit Racing, Touring Cars, DTM, Endurance, Rally, Rally-cross, Motorcycling, Superbike.

- 4) Try Scorers (First/Last/Anytime/Team) – All bets include any potential extra (over) time. ~~Any bets placed on players in the game day 17 stand regardless of the player's participation (or lack thereof) in the match. Stakes on players not included in game day 17 will be refunded. Stakes on players who do not take the field will be refunded.~~

- 3) "Over/Under" offers on unfinished matches/events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum number of occurrences which should have been needed to bring the offer to the natural conclusion, will be added as necessary depending on the number of sets which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer this will be settled as such. See examples from ~~the tennis-~~section <Section C, para 24.3> for reference.

- 4) "Handicap" offers require all scheduled heats to be completed for bets to stand except in those events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers which will be settled accordingly. See examples from ~~<Section C, para 24.3> the tennis-~~section for reference.

- Example 3 – A "Best of 5" set match ends with player A retiring with a score of 6-2, 3-6, 1-4: Had player A won all remaining games (should the match have continued without retirement), the score would have been 6-2, 3-6, 6-4, 6-0, making the margin 9 games. However, this is not the highest possible margin as the match could also have ended 6-2, 3-6, 6-7, 6-0, 6-0 making the margin 12 games. As such, any bets on -12.5 or higher are settled as lost and any bets on — - 11.5 or lower are settled as void.

- 3) "Over/Under" and "Handicap" offers on unfinished matches the outcome of which is already determined before the interruption of play and/or where any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of sets which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer, this will be settled as such. See examples from ~~<Section C, para 24.3> the tennis-~~section for reference.

- 1) This section is valid for the following sports: Alpine Skiing, Biathlon, Bobsleigh, Cross Country Skiing, Freestyle, Nordic Combined, Short Track, Skeleton, Ski Jumping, Snowboard & Speed Skating.

2)

- 3) With the exception of the instances as detailed in ~~<Section C, Para 3327~~, Clause 4>, addition or removal of title stipulations (example: a match initially announced as a non-title match gets changed into a title match) or changes in weight classes as well as either/both of the fighters fail to make the pre-established weight, will not result in the voiding of the offers as much as the fight takes place on the card it was announced for.

- 3) "Over/Under" offers on unfinished matches/events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum number of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of legs which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer this will be settled as such. See examples from [<Section C, para 24.3>](#) ~~the Tennis section~~ for reference.
- 4) "Handicap" offers require all scheduled sets to be completed for bets to stand except in those events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers which will be settled accordingly. See examples from [<Section C, para 24.3>](#) ~~the Tennis section~~ for reference.

30. Non Sport/Special Events

- 1) [The conditions stated in this section refer to all offers which would not be reasonably classified under the different sports categories \(Ex. TV Awards, Contests, Entertainment and similar\). Whenever applicable, and unless otherwise stated in this section or in the offer, settlement of these offers will be based on the Rules under <Section B, Para 5>.](#)
- 2) [Unless otherwise specified below or in conjunction with the bet offer, all bets which fall under this section are valid until a result is officially declared regardless of any delays in the announcement, extra voting rounds, etc. which would be needed for the outcome to be announced.](#)



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

FROM: Brittany Costello – Compliance Officer II, Sports Wagering
Andrew Steffen – Compliance and Operations Manager, Sports Wagering

MEMO: 9/15/2026 **MEETING:** 9/24/2026

RE: MGM Springfield Request to Payout Lost Wagers

EXECUTIVE SUMMARY:

MGM Springfield, a Category 1 Sports Wagering Operator, has submitted a request seeking Commission approval to satisfy claims for lost sports wagering tickets pursuant to 205 CMR 238.47(1)(b). This request pertains to a patron who alleges the loss of two (2) valid wagering tickets prior to redemption. MGM Springfield has conducted an internal review for this claim and has provided supporting documentation indicating that the tickets were valid, unpaid, and otherwise eligible for redemption.

REGULATION BACKGROUND:

Pursuant to 205 CMR 238.47, Sports Wagering Operators are prohibited from paying a sports wagering ticket unless the ticket is physically presented for redemption. However, 205 CMR 238.47(1)(b) provides a limited exception, allowing payment of a lost, stolen, or destroyed ticket when the Commission determines that payment is appropriate based on documentation and information submitted by the Operator.

Specifically, 205 CMR 238.47(1)(b) permits payment where the Operator demonstrates, to the Commission's satisfaction, that the claim is valid and that payment would not result in fraud, duplication, or other integrity concerns.

“(1) Validation Process. The Sports Wagering Operator shall define and implement procedures to ensure the validity of winning Sports Wagering tickets and vouchers, and process payouts thereof.”



(b) The Sports Wagering Operator shall not satisfy claims on lost, mutilated, or altered Sports Wagering tickets without authorization of the Commission.”

DISCUSSION:

MGM Springfield has submitted a request via email seeking Commission authorization to pay a patron who reportedly lost two (2) sports wagering tickets. MGM Springfield represented that the patron reported the lost tickets and provided sufficient information to allow MGM to identify the wager through its surveillance and other internal systems.

Request

Ticket #1

- From MGM Springfield via email on 8/28/2026
- Wager Amount: \$5,000.00
- Pending Payout: \$6,000.00

Ticket #2

- From MGM Springfield via email on 8/28/2026
- Wager Amount: \$5,000.00
- Pending Payout: \$6,000.00

For each request, MGM Springfield conducted an internal investigation, which included verification that:

- The ticket was validly issued by MGM Springfield;
- The wager resulted in a winning outcome;
- The ticket had not been previously redeemed;
- No conflicting claims or indicators of fraud were identified; and
- The requested payment amount aligns with the recorded wagering data.

MGM Springfield supplied documentation supporting each claim, including the wager detail, ticket identifiers, timestamps, and internal system records. SWD reviewed the materials submitted and found them to be consistent with the requirements of 205 CMR 238.47(1)(b).

Based on SWD review, there are no indications that approval of this request would compromise wagering integrity or result in duplicate payment. The claim appears to meet the regulatory standard for a lost ticket payment under the applicable regulation.



ADDITIONAL QUESTION OF DELEGATION:

Should the Commission be so inclined, the authorization required by 205 CMR 238.47(1)(b) could be delegated to the SWD. Such authorization could be delegated in all circumstances or limited to claims below a particular dollar threshold.

For example, the Commission could delegate to the SWD the authority to provide authorization under 205 CMR 238.47(1)(b) where the claim on a lost, mutilated, or altered sports wagering ticket is for a payout of \$1,999.99 or less.¹

The Commission may, however, establish a different threshold, including \$5,000 or another amount determined appropriate by the Commission.

CONCLUDING STATEMENT:

The SWD recommends the Commission approve MGM Springfield's request to pay the patron for their two (2) lost sports wagering tickets pursuant to 205 CMR 238.47(1)(b).

Approval of this request reflects the Commission's application of 205 CMR 238.47(1)(b) to a fact-specific lost ticket claim supported by sufficient documentation and staff review, where no indicators of fraud, duplication, or wagering integrity concerns have been identified.

Additionally, the SWD seeks guidance from the Commission on whether you would like to delegate in any capacity the authorization required by 205 CMR 238.47(1)(b).

¹ Beginning on January 1, 2026, the [federal threshold](#) for reporting payments of winnings from bingo, keno and slot machine play is \$2,000.



Legal Division

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

FROM: Jenna Hentoff, Deputy General Counsel
Caitlin Monahan, Director of the Investigations and Enforcement Bureau
Kathleen Kramer, Assistant Director of the Investigations and Enforcement Bureau

CC: Kevin Scanlon, General Counsel

RE: Proposed amendments to 205 CMR 229.03: *Interim Authorization*

DATE: September 24, 2026

Overview:

Enclosed for the Commission's review are proposed amendments to 205 CMR 229.03, which governs interim authorization as part of a proposed transfer of interest in a sports wagering license. The proposed amendments are being brought forward for initial review and a vote for approval to begin the promulgation process by emergency, after which it will proceed through the normal promulgation process.

Discussion:

The proposed amendments to 205 CMR 229.03 are intended to align its language regarding procedures for use of interim authorization in connection with a transfer of interest with language found in 205 CMR 116.10 which sets forth the same procedures in regard to a gaming license. Amendments to 205 CMR 116.10 were promulgated by the Commission in February 2026 and were based upon a review jointly conducted by the Legal Division and the Investigations and Enforcement Bureau ("IEB") during which several process and timing concerns were identified. The amendments to 205 CMR 116.10 were intended to improve clarity, efficiency and administrative manageability in connection with a transfer of interest.

The Legal Division and IEB are recommending that 205 CMR 229.03 be amended consistent with the previously approved amendments as both regulatory sections govern procedures related to interim authorization in a transfer of interest. As with 205 CMR 116.10, the amendments to 205 CMR 229.03 will provide the Commission with the ability to decide, on a case-by-case basis, whether to request an interim authorization report from the IEB regarding its initial review



Massachusetts Gaming Commission

of the transferee's suitability or to proceed to a full suitability review. The amendments will also allow for the extension of associated timelines in the process if such is necessary to complete a thorough review.

A review of the proposed amendments to 205 CMR 229.03, consistent with 205 CMR 116.10, is as follows:

- Titles were added to several subsections for the purpose of uniformity.
- The word "and" was removed from the phrase "and/or" as it appears in 205 CMR 229.03(1) and (2) to clarify that a matter may implicate either 205 CMR 215.00 or G.L. c. 23N.
- Amendments have been made to 205 CMR 229.03(3) to permit the Commission to request that the IEB produce an interim authorization report with a hearing to be held on the interim authorization of the proposed transferee within 30 days of the report's submission to the Commission.
- Amendments to 205 CMR 229.03(4) indicate that the review of the proposed transfer of interest will proceed to a full suitability review if the Commission does not request an interim authorization report or if interim authorization is denied after a hearing.
- Several amendments were made to 205 CMR 229.03(5). First, language was added to allow the Commission to extend the timeline by which an interim authorization report must be produced to the Commission, if such is requested. Second, subsection (f) was added to the requirements for approval of interim authorization, consistent with those found in 205 CMR 116.10(5). Third, language was added to clarify that a full suitability review must be completed within a 13-month period after submission of a complete transfer application, a period which may be extended by the Commission.

205 CMR 229.00: REVIEW OF A PROPOSED TRANSFER OF INTERESTS

229.03: Interim Authorization

(1) Contractual Transfers. Whenever any person contracts to transfer a Sports Wagering License or an ownership interest in a Sports Wagering Licensee or its parent, holding or intermediary company, or any property relating to a sports wagering operation, under circumstances which require that the transferee obtain licensure or be found qualified pursuant to 205 CMR 215.00: *Applicant and Qualifier Suitability Determination, Standards, and Procedures* ~~and~~/or M.G.L. c. 23N, the contract shall not specify a closing or settlement date which is earlier than 121 days after the submission of a completed transfer application. Said application shall consist of:

- (a) For the transferee, the survey described at 205 CMR 211.01(1)(a);
- (b) For the transferee and each new qualifier, the materials described at 205 CMR 211.01(1)(c) through(e), as appropriate;
- (c) For the transferee and each new qualifier, any attestation forms required by the Bureau;
- (d) A fully executed trust agreement in accordance with 205 CMR 229.03(6) which shall be subject to Commission approval. Any contract provision which specifies a closing or settlement date sooner than 121 days after submission of the transfer application shall be void for all purposes.

(2) Transfers of Publicly Traded Securities. Whenever any Person, as a result of a transfer of publicly traded securities of a Sports Wagering Licensee or its parent, holding or intermediary company, is required to be qualified under 205 CMR 215.02: *Persons Required to Be Qualified* ~~and~~/or M.G.L. c. 23N, the Person including all related qualifiers shall, within 30 days after a Schedule 13D or 13G is filed with the U.S. Securities and Exchange Commission, or after the Bureau notifies the Person that qualification is required, or within such additional time as the Bureau may for good cause allow, file a completed transfer application as described in 205 CMR 229.03(1). No extension of the time for filing a completed transfer application shall be granted unless the Person submits a written acknowledgement recognizing the jurisdiction of the ~~commission~~ Commission and the obligations imposed by M.G.L. c. 23N and 205 CMR. If a proposed transferee, including all related qualifiers, fails to timely file a complete transfer application, such failure shall constitute a ~~per se~~ negative finding of suitability to continue to act as a security holder, and the Commission shall take appropriate action including requiring divestiture by the transferee or redemption of the securities by the transferor.

(3) Request for Interim Authorization. If a prospective transferee files a ~~complete~~ transfer application in a timely manner the Commission may then request that the Bureau produce an interim authorization report under 205 CMR 229.03(5). Within 30 days after the Bureau's submission to the Commission of the interim authorization report, the Commission shall hold a hearing in accordance with 205 CMR 101.01(2)(d) and render a decision on the interim authorization of the proposed transferee ~~within 120 days after such filing or, if it is a contractual transfer, prior to the proposed closing or settlement date~~. If interim authorization is approved for a transfer governed by 205 CMR 229.03(1) then the closing or settlement may occur, and the prospective transferee may hold the securities or interests subject to the provisions of 205 CMR 229.03(4) until a final determination of suitability is made by the ~~commission~~ Commission. If interim authorization is approved for a transfer governed by 205 CMR 229.03(2) then the prospective transferee may continue to hold the securities or interests subject to the provisions

of 205 CMR 229.03(4) until a final determination of suitability is made by the Commission.

(4) Effect of Denial of Interim Authorization. ~~If, the Commission does not request that the Bureau produce an interim authorization report or if,~~ after a hearing, the Commission denies interim authorization, there shall be no closing or settlement of a contract to transfer an interest governed by 205 CMR 229.03(1) until the Commission makes a final determination on the suitability of the transferee in accordance with 205 CMR 215.01(1). If the Commission denies interim authorization for a proposed transfer subject to 205 CMR 229.03(2), all securities and interests subject to the transfer shall be promptly transferred into the trust. If the commission grants interim authorization for any transfer, it may at any time thereafter order all securities and interests subject to the transfer transferred into the trust if it finds reasonable cause to believe that the proposed transferee may be found unsuitable. If a prospective transferee fails or refuses to timely transfer securities and interests into the trust upon direction from the Commission said transferee shall be issued a negative determination of suitability.

(5) Bureau Investigation. After determining that a person is required to be qualified in accordance with 205 CMR 215.02: *Persons Required to Be Qualified*, the Bureau shall commence an investigation into the suitability of the transferee, which may be limited to a review of the information required to be reviewed in an investigation undertaken in accordance with 205 CMR 215.01(2)(b). ~~The If the Commission so requests pursuant to 205 CMR 229.03(3), the~~ Bureau shall produce and forward to the Commission an interim authorization report no later than 90 days after the date that a complete transfer application is submitted by the proposed transferee, ~~or such later date as the Commission may allow. The Following a hearing, the commission~~ Commission may approve interim authorization if it finds that:

- (a) The transferee has submitted a complete transfer application;
- (b) The transferee has submitted a fully executed trust agreement in accordance with 205 CMR 229.03(6);
- (c) The trustee or trustees required under 205 CMR 229.03(6) have satisfied the qualification criteria applicable to qualifiers;
- (d) There is no preliminary evidence of anything that would serve to disqualify the transferee from licensure in accordance with ~~M.G.L. c. 23N~~, M.G.L. c. 23N, §§ 5, 6, and/or 9(a) or 205 CMR 215.00: *Applicant and Qualifier Suitability Determination, Standards, and Procedures*, nor is there any other reason known at the time why a positive determination of suitability may not ultimately be achieved;
- ~~(e)~~ The transfer would not violate 205 CMR 229.02(3) or (4);
- ~~(e)(f)~~ The transferee has certified that they are unaware of any reason why the transferee would not be found qualified pursuant to M.G.L. c. 23N, §§ 5, 6, and/or 9(a) or 205 CMR 215.00. (If the transferee is not an individual, the certification shall be made by the chief executive officer or like individual);
- ~~(f)(g)~~ It is in the best interests of the Commonwealth for the Sports Wagering Operation to continue to operate pursuant to interim authorization; and
- ~~(g)(h)~~ If the transfer will result in a change of control, the transferee has agreed in writing in accordance with 205 CMR 229.04 to comply with all of the transferor's existing license obligations or has otherwise petitioned the Commission for modification or elimination of one or more of those obligations.

If the Commission approves interim authorization, during the period of interim authorization, the Bureau shall continue its suitability investigation as may be necessary for a determination of the suitability of the person granted interim authorization. Within nine

months after the interim authorization decision, which period may be extended by the Commission ~~for one three-month period~~, the Commission shall hold a hearing and render a determination on the suitability of the applicant in accordance with 205 CMR 215.01(1). If the Commission denies interim authorization or interim authorization is not requested, the Commission and Bureau shall proceed with the qualification process pursuant to 205 CMR 215.00 and shall complete that process within 13 months of the submittal of a completed transfer application, which 13-month period may be further extended by the Commission.

(6) Trust Agreements. A trust agreement required to be submitted with a transfer application in accordance with 205 CMR 229.03(1) and (2) shall be fully executed upon submission and contain, at a minimum, the following:

- (a) A provision for the transfer and conveyance to the trustee of all of the transferee's proposed present and future right, title and interest in the sports wagering licensee, or its parent, holding or intermediary company, including all voting rights in securities upon the occurrence of an event described in 205 CMR 229.03~~3~~(4) or if otherwise directed to do so by the Bureau in its discretion, pending a final suitability determination by the Commission.
- (b) A provision consistent with the provisions of 205 CMR 229.03 for the distribution of any trust res upon a positive determination of suitability, negative determination of suitability, or at the direction of the Commission in accordance with 205 CMR 229.03(8).
- (c) A provision identifying the trustee(s) and requiring the trustee to timely submit the materials described in 205 CMR 211.01(1)(c) through(f), as applicable, in order to be found qualified by the Commission in accordance with 205 CMR 215.01(1).
- (d) A provision identifying the compensation for the service, costs and expenses of the trustee(s), which shall be made subject to the approval of the Commission.
- (e) A mechanism by which the trustee may effectuate divestiture or redemption of securities, or a like process, in the event of a negative determination of suitability being issued to the transferee.
- (f) Any additional provisions the Commission deems necessary and desirable.

(7) Power of Trustee. The trustee of the trust shall exercise all rights incident to the ownership of the property subject to the trust, and shall be vested with all powers, authority and duties necessary to the unencumbered exercise of such right, and the transferee shall have no right to participate in the earnings of the Sports Wagering Licensee or receive any return on its investment or debt security holdings during the time the securities or interest are in the trust. Earnings may, however, accrue to or into the trust.

(8) Termination of Trust Agreement. The trust agreement shall remain operative until the Commission issues the transferee a positive determination of suitability in accordance with 205 CMR 215.01(1)(e) (and in the event the interest has been placed into the trust, the trustee distributes the trust res) or the Commission issues the transferee a negative finding of suitability and the trust res is disposed of in accordance with 205 CMR 229.03(9). The trust shall otherwise only be revocable prior to a determination of suitability being issued upon Commission approval at the request of the settlor. In the event of such a request the Commission may direct the trustee to dispose of the trust res in accordance with 205 CMR 229.03(9).

(9) Effect of Negative Determination of Suitability. If the Commission issues a negative determination of suitability in accordance with 205 CMR 215.01(1)(e)1., a contract for the transfer of interests shall thereby be terminated for all purposes without liability on the part of

the transferor. In the event of such negative determination, where the subject interests have been transferred into a trust in accordance with 205 CMR 229.03(4), the trustee shall endeavor and be authorized to attempt to sell, assign, convey or otherwise dispose of all trust res in accordance with the means established in accordance with 205 CMR 229.03(6)(e) or as otherwise directed by the ~~commission~~Commission. Any subsequent transferee must be appropriately licensed or qualified in accordance with 205 CMR 229.00. The disposition of trust res by the trustee shall be completed within 120 days of the denial of qualification, or within such additional time as the Commission may for good cause allow. The proceeds of such disposition shall be distributed to the unsuitable transferee only in an amount not to exceed the lower of the actual cost of the assets to such unsuitable transferee, or the value of such assets calculated as if the investment had been made on the date the assets were transferred into the trust, and any excess remaining proceeds shall be paid to the Massachusetts Sports Wagering Control Fund in accordance with M.G.L. c. 23N, § 15.



Legal Division

SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, § 2 relative to the proposed amendment to **205 CMR 229: Review of a Proposed Transfer of Interest, specifically 205 CMR 229.03: Interim Authorization**, notice of which was filed with the Secretary of the Commonwealth.

This regulation was developed as part of the process of promulgating regulations governing the operation of sports wagering in the Commonwealth and governs the process related to a transfer of interest in a sports wagering licensee. The amendments to the regulation update the Commission’s standards and procedures for making the determination of suitability of a transferee applicant and the process of interim authorization. The regulation is authorized by G.L. c. 23N, §§ 4 and 6(h).

The amendments apply directly to sports wagering transfer of interest applications and those who are required to be licensed or qualified in the Commonwealth. Accordingly, the proposed amendment is not likely to have an impact on small businesses. In accordance with G.L. c. 30A, § 2, the Commission offers the following responses:

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

There are no small businesses that the Commission anticipates would be impacted by the amendments as they apply solely to the standards and procedures related to a transfer of interest application and the Commission’s ability to require interim authorization of the applicant.

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

There are no projected reporting, recordkeeping and other administrative costs created by the amendments to this regulation that would affect small businesses.

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

The proposed amendments require design standards that encourage uniformity and transparency. In addition, design standards are essential because they set out the specific criteria that guide the Commission’s standards and procedures when reviewing potential transfers of interest in a sports wagering license.



Massachusetts Gaming Commission

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

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

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

The amendments to this regulation are unlikely to deter or encourage the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

/s/ Jenna Hentoff
Jenna Hentoff
Deputy General Counsel

Dated: September 24, 2026



Massachusetts Gaming Commission

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Legal Division

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

FROM: Kevin Scanlon, General Counsel
Judith Young, Senior Associate General Counsel

CC: Alexandra Lightbown, DVM, Director of the Division of Racing

RE: **205 CMR 17.00: Review of a Proposed Transfer of Interests in a Racing Meeting License** – Request for Finalization

DATE: September 24, 2026

Overview:

Enclosed for the Commission's review is the final proposed draft of 205 CMR 17:00: *Review of a Proposed Transfer of Interests in a Racing Meeting License*. The regulation was first presented for initial discussion and a request for promulgation by emergency to the Commission at the public meeting held on July 22, 2026.

The regulation was filed by emergency on July 22, 2026, and has been making its way through the promulgation process. A public hearing was held on September 8, 2026, and no additional comments were provided to the Commission. In accordance with the requirements within G.L. c. 128, § 9B, the regulation will be filed with the Clerk of the House and the Clerk of the Senate on September 25, 2026, for the requisite 60-day period.¹ The final draft of 205 CMR 17.00 and the accompanying Amended Small Business Impact Statement have been included for the Commissioner's review. No additional changes have been made to the regulation since its presentation on July 22, 2026.

The Legal Division is seeking a vote of authorization to send the regulation to the Legislature and a vote to file the regulation and Amended Small Business Impact Statement with the Secretary of State, thereafter.

¹ To accommodate the required 60-day filing period with the legislature, 205 CMR 17.00 will be re-filed by emergency on or before October 20, 2026, with the Secretary of State to prevent a lapse before the final adoption.



Massachusetts Gaming Commission

205 CMR 17.00: REVIEW OF A PROPOSED TRANSFER OF INTERESTS IN A RACING MEETING LICENSE

Section

17.01: Notice

17.02: Approval

17.03: Authorization

17.04: Review of a Proposed Transfer of Interests

17.05: Fees for Review of Transfer

17.01: Notice

(1) Pursuant to M.G.L. c. 128A, § 11(C), no person, firm, partnership, trust, association or corporation who has been granted a license to conduct a horse or dog racing meeting, or an officer, director or the beneficial owner of ten per cent or more of the stock of a corporation holding such a license, shall sell, transfer, convey or cause to be transferred, singly or in concert with others, more than ten per cent of the value or stock of the facility or corporation so licensed without first obtaining the written approval of the commission, except in the case of a publicly held corporation. The commission shall have the same rights as to transferees as it would have with respect to original applicants for licensure.

(2) Notwithstanding 205 CMR 17.01(1), the following transactions shall not be considered transfers subject M.G.L. c. 128A, § 11(C) and do not require prior notification to or approval of the Bureau:

(a) The open market transfer of a publicly traded interest in a Racing Meeting Licensee, or holding, parent or intermediary company of a Racing Meeting Licensee where such transfer results in the transferee holding less than a 10% interest in the holding, parent or intermediary company. The Racing Meeting Licensee, applicant, or Qualifier shall however, provide notice of the transaction promptly to the Bureau upon its consummation.

(b) The granting of a security interest in return for financing to a bona fide banking institution, as defined in M.G.L. c. 167A, § 1, or a commercial financial institution as defined in M.G.L. c. 63, § 1, so long as the *bona fide* banking institution or the commercial financial institution does not, by virtue of its security interest, possess the intention to influence or affect the affairs or operations of a Racing Meeting Licensee or applicant or Qualifier for a Racing Meeting License. The Racing Meeting Licensee, applicant, or Qualifier shall however, provide notice of the transaction promptly to the Bureau upon its consummation.

17.02: Approval

(1) Any transfer subject to M.G.L. c. 128A, § 11(c) that does not result in a new qualifier being designated in accordance with 205 CMR 15.04 (5): *Persons Required to Be Qualified* may be approved by the Commission in a public meeting.

(2) Any transfer subject to M.G.L. c. 128A, § 11(C) that results in a new qualifier being designated in accordance with 205 CMR 15.04(5): *Persons Required to Be Qualified* must be approved by the Commission. Said approval shall be subject to the provisions of 205 CMR 17.04. Both the transferor and transferee shall be jointly and severally responsible for the payment of the investigatory and other fees provided for in 205 CMR 17.05.

(3) In accordance with M.G.L. c. 128A, § 11(C), the commission shall approve such sale, transfer or conveyance unless it finds that the consideration therefor is (i) inadequate or (ii) without good cause, (iii) that the sale or transfer results in an undesirable concentration of ownership of racing facilities within the commonwealth, or (iv) that the sale or transfer has an adverse impact upon the integrity of the racing industry. Without implied limitation, a transfer may be considered to have an adverse impact upon the integrity of the racing industry if the Commission determines that the proposed transferee does not satisfy the applicable considerations set forth in M.G.L. c. 128A, §§ 1, 2, or 3(i); 205 CMR 15.04: *Suitability of New and Existing Licensees, and Qualifiers*; or any other applicable provisions of M.G.L. chs. 128A, 128C or 205 CMR, or if the transferee does not satisfy the provisions of 205 CMR 17.04. A prospective transferee shall establish its individual qualifications for licensure to the commission by clear and convincing evidence.

205 CMR: MASSACHUSETTS GAMING COMMISSION

- (4) The Commission shall not approve the transfer of a Racing Meeting License for one year after the initial issuance of the license unless one of the following occurs:
- (a) the parent, holding company, or intermediary company of the Racing Meeting Licensee experiences a change in ownership resulting in a change of control;
 - (b) the Racing Meeting Licensee fails to maintain suitability; or
 - (c) the Commission determines that other circumstances exist which affect the Racing Meeting Licensee's ability to conduct racing operations successfully.

17.03: Interim Authorization

- (1) Contractual Transfers. Whenever any person contracts to transfer a Racing Meeting License or an ownership interest in a Racing Meeting Licensee, as defined in 205 CMR 15.01: *Authority and Definitions*, or its parent, holding or intermediary company, or any property relating to a racing operation, under circumstances which require that the transferee obtain licensure or be found qualified pursuant to 205 CMR 15.04: *Suitability of New and Existing Licensees, and Qualifiers* and/or M.G.L. c. 128A, the contract shall not specify a closing or settlement date which is earlier than 121 days after the submission of a completed transfer application. Said application shall consist of:
- (a) For the transferee, the survey described at 205 CMR 15.02(1)(a)1;
 - (b) For the transferee and each new qualifier, the materials described at 205 CMR 15.02(1)(a)2 and 3, as appropriate;
 - (c) For the transferee and each new qualifier, any attestation forms required by the Bureau;
 - (d) For the transferee, the materials described at 205 CMR 15.02(1)(c) through (e), as appropriate;
 - (e) Application for Racing License Transfer form as provided by the Commission;
 - (f) A fully executed trust agreement in accordance with 205 CMR 17.03(6) which shall be subject to Commission approval. Any contract provision which specifies a closing or settlement date sooner than 121 days after submission of the transfer application shall be void for all purposes.
- (2) Transfers of Publicly Traded Securities. Whenever any Person, as a result of a transfer of publicly traded securities of a Racing Meeting Licensee or its parent, holding or intermediary company, is required to be qualified under 205 CMR 15.04(5): *Persons Required to Be Qualified*, the Person including all related qualifiers shall, within 30 days after a Schedule 13D or 13G is filed with the U.S. Securities and Exchange Commission, or after the Bureau notifies the Person that qualification is required, or within such additional time as the Bureau may for good cause allow, file a completed transfer application as described in 205 CMR 17.03(1). No extension of the time for filing a completed transfer application shall be granted unless the Person submits a written acknowledgement recognizing the jurisdiction of the commission and the obligations imposed by M.G.L. c. 128A and 205 CMR. If a proposed transferee, including all related qualifiers, fails to timely file a complete transfer application, such failure shall constitute a per se negative finding of suitability to continue to act as a security holder, and the Commission shall take appropriate action including requiring divestiture by the transferee or redemption of the securities by the transferor.
- (3) If a prospective transferee files a complete transfer application in a timely manner the Commission may then request the bureau to produce an interim authorization report. Within 30 days after the bureau's submission to the Commission of the interim authorization report the Commission shall hold a hearing in accordance with 205 CMR 101.01(2)(d) and render a decision on the interim authorization of the proposed transferee. If interim authorization is approved for a transfer governed by 205 CMR 17.03(1) then the closing or settlement may occur, and the prospective transferee may hold the securities or interests subject to the provisions of 205 CMR 17.03(4) until a final determination of suitability is made by the commission. If interim authorization is approved for a transfer governed by 205 CMR 17.03(2) then the prospective transferee may continue to hold the securities or interests subject to the provisions of 205 CMR 17.03(4) until a final determination of suitability is made by the Commission.
- (4) If, the Commission does not request the bureau to produce an interim authorization report, or, after a hearing, the Commission denies interim authorization, there shall be no closing or settlement of a contract to transfer an interest governed by 205 CMR 17.03(1) until the Commission makes a final determination on the suitability of the transferee in accordance with 205 CMR 15.04(1). If the Commission denies interim authorization for a proposed transfer subject to 205 CMR 17.03(2), all securities and interests subject to the transfer shall be promptly transferred into the trust. If the commission grants interim authorization for any transfer, it may at any time thereafter order all securities and interests subject to the transfer

transferred into the trust if it finds reasonable cause to believe that the proposed transferee may be found unsuitable. If a prospective transferee fails or refuses to timely transfer securities and interests into the trust upon direction from the Commission said transferee shall be issued a negative determination of suitability.

(5) After determining that a person is required to be qualified in accordance with 205 CMR 15.04(5): *Persons Required to Be Qualified*, the Bureau shall commence an investigation into the suitability of the transferee, which may be limited to the information required in accordance with 205 CMR 15.04(2)(b). If the Commission so requests pursuant to 205 CMR 17.03(3), the Bureau shall produce and forward to the Commission an interim authorization report no later than 90 days after the date that a complete transfer application is submitted by the proposed transferee, or such later date as the Commission may allow. Following a hearing, the commission may approve interim authorization if it finds that:

- (a) The transferee has submitted a complete transfer application;
- (b) The transferee has submitted a fully executed trust agreement in accordance with 205 CMR 17.03(6);
- (c) The trustee or trustees required under 205 CMR 17.03(6) have satisfied the qualification criteria applicable to qualifiers;
- (d) There is no preliminary evidence to disqualify the transferee from licensure in accordance with M.G.L. c. 128A, §§ 2, 3i, 5C, M.G.L. c. 128C or 205 CMR 15.04: *Suitability of New and Existing Licensees, and Qualifiers*, nor is there any other reason known at the time why a positive determination of suitability may not ultimately be achieved;
- (e) The transfer would not violate 205 CMR 17.02(3) or (4);
- (f) It is in the best interests of the Commonwealth for the Racing Meeting Operation to continue to operate pursuant to interim authorization; and
- (g) If the transfer will result in a change of control, the transferee has agreed in writing in accordance with 205 CMR 17.04 to comply with all of the transferor's existing license obligations or has otherwise petitioned the Commission for modification or elimination of one or more of those obligations.

If the Commission approves interim authorization, during the period of interim authorization, the Bureau shall continue its suitability investigation as may be necessary for a determination of the suitability of the person granted interim authorization. Within nine months after the interim authorization decision, which period may be extended by the Commission, the Commission shall hold a hearing and render a determination on the suitability of the applicant in accordance with 205 CMR 15.04(1). If the Commission denies interim authorization, or no interim authorization is requested, the Commission and Bureau shall proceed with the qualification process pursuant to 205 CMR 15.00 and shall complete the process within thirteen months of the submittal of a completed Racing License Transfer application, which thirteen-month period may be further extended by the Commission.

(6) Trust Agreements. A trust agreement required to be submitted with a transfer application in accordance with 205 CMR 17.03(1) and (2) shall be fully executed upon submission and contain, at a minimum, the following:

- (a) A provision for the transfer and conveyance to the trustee of all of the transferee's proposed present and future right, title and interest in the racing meeting licensee, or its parent, holding or intermediary company, including all voting rights in securities upon the occurrence of an event described in 205 CMR 17.03(4) or if otherwise directed to do so by the Bureau in its discretion, pending a final suitability determination by the Commission.
- (b) A provision consistent with the provisions of 205 CMR 17.03 for the distribution of any trust res upon a positive determination of suitability, negative determination of suitability, or at the direction of the Commission in accordance with 205 CMR 17.03(8).
- (c) A provision identifying the trustee(s) and requiring the trustee to timely submit the materials described in 205 CMR 15.02(1)(a), as applicable, in order to be found qualified by the Commission in accordance with 205 CMR 15.04(1).
- (d) A provision identifying the compensation for the service, costs and expenses of the trustee(s), which shall be made subject to the approval of the Commission.
- (e) A mechanism by which the trustee may effectuate divestiture or redemption of securities, or a like process, in the event of a negative determination of suitability being issued to the transferee.
- (f) Any additional provisions the Commission deems necessary and desirable.

(7) The trustee of the trust shall exercise all rights incident to the ownership of the property

subject to the trust, and shall be vested with all powers, authority and duties necessary to the unencumbered exercise of such right, and the transferee shall have no right to participate in the earnings of the Racing meeting Licensee or receive any return on its investment or debt security holdings during the time the securities or interest are in the trust. Earnings may, however, accrue to or into the trust.

(8) The trust agreement shall remain operative until the Commission issues the transferee a positive determination of suitability in accordance with 205 CMR 15.04(1)(e) (and in the event the interest has been placed into the trust, the trustee distributes the trust res) or the Commission issues the transferee a negative finding of suitability and the trust res is disposed of in accordance with 205 CMR 17.03(9). The trust shall otherwise only be revocable prior to a determination of suitability being issued upon Commission approval at the request of the settlor. In the event of such a request the Commission may direct the trustee to dispose of the trust res in accordance with 205 CMR 17.03(9).

(9) If the Commission issues a negative determination of suitability in accordance with 205 CMR 15.04(1)(e)1., a contract for the transfer of interests shall thereby be terminated for all purposes without liability on the part of the transferor. In the event of such negative determination, where the subject interests have been transferred into a trust in accordance with 205 CMR 17.03(4), the trustee shall endeavor and be authorized to attempt to sell, assign, convey or otherwise dispose of all trust res in accordance with the means established in accordance with 205 CMR 17.03(6)(e) or as otherwise directed by the commission. Any subsequent transferee must be appropriately licensed or qualified in accordance with 205 CMR 17.00. The disposition of trust res by the trustee shall be completed within 120 days of the denial of qualification, or within such additional time as the Commission may for good cause allow. The proceeds of such disposition shall be distributed to the unsuitable transferee only in an amount not to exceed the lower of the actual cost of the assets to such unsuitable transferee, or the value of such assets calculated as if the investment had been made on the date the assets were transferred into the trust, and any excess remaining proceeds shall be paid to the Commission.

17.04: Review of a Proposed Transfer of Interests

(1) If a proposed transfer of interests is subject to G.L. c. 128A §11(C), the proposed transferee shall, as a condition of the transfer, unless otherwise allowed by the Commission in accordance with 205 CMR 17.01(2), provide the Commission with a written agreement to assume all obligations of the Racing Meeting License including, but not limited to, commitments made in the Application for Racing License Transfer, all terms and conditions contained in the Racing Meeting License, Operation Certificate, and all permits, licenses, and other approvals issued by any federal, state, and local governmental agencies. Additionally, the written agreement shall include an attestation from the transferor and transferee, accompanied by relevant supporting documentation, that said transfer comports with all applicable terms and conditions of the aforementioned instruments.

(2) Prior to submitting the written agreement referenced in 205 CMR 17.04(1), a proposed transferee may petition the Commission to allow for the modification of any terms, conditions, or agreements applicable to the Racing Meeting License held by the transferor, provided that the modifications are not inconsistent with any applicable provisions of M.G.L. chs. 128A, 128C, 205 CMR, and St. 2025, c. 73 §§ 58-67, 69-70, 73-74 and 180.

(3) Notwithstanding 205 CMR 17.04(1):

(a) The Commission may in its discretion require submission of any additional application material as described in 205 CMR 15.02: *Racing Meeting License Application*, and 15.04: *Suitability of New and Existing Licensees, and Qualifiers* to assist in its determination as to whether to allow a modification in accordance with 205 CMR 17.04(2) and/or approve a transfer of interests in accordance with 205 CMR 17.02.

(b) A proposed transferee shall have the same duty to cooperate with such requests for information as does an Applicant under 205 CMR 15.08: *Additional Information and Cooperation of Racing Meeting Applicants and Licensees*.

17.05: Fees for Review of Transfer

(1) The transferor shall be responsible for paying to the Commission all costs incurred by the

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Commission, directly or indirectly, for reviewing any transfer that requires prior notification to the Bureau, in accordance with 205 CMR 17.02(2).

(2) For purposes of 205 CMR 17.05, the costs associated with reviewing the transfer shall include, without limitation:

- (a) All costs for conducting an investigation into any new qualifiers, the transferee, the trustee, and any other person subject to the jurisdiction of the Commission under M.G.L. c. 128A relating to the transfer in question; and
- (b) All fees for services, disbursements, out of pocket costs, allocated overhead, processing charges, administrative expenses, professional fees, and other costs directly or indirectly incurred by the Commission, including without limitation all such amounts incurred by the Commission to and through the Bureau, the Division, the Gaming Enforcement Unit, the Gaming Liquor Enforcement Unit, and any contract investigator.

(3) If, the Commission establishes a schedule of fees, wages, and other charges for the cost of investigating applicants, said schedule shall also govern the assessment of costs under this section.

(4) The Commission shall assess to the transferor all other costs paid by or for the Commission, directly or indirectly, to any other Person for conducting an investigation into a transferor plus an appropriate percent for overhead, processing and administrative expenses.

(5) Other Requirements for Review Fees.

- (a) All required review fees pursuant to 205 CMR 17.05 shall be non-refundable, due and payable notwithstanding the withdrawal, abandonment, or denial of any transfer application.
- (b) The transferor and the transferee shall be jointly and severally liable for any amounts chargeable to the transferor pursuant to 205 CMR 17.05.

REGULATORY AUTHORITY

205 CMR 17.00: M.G.L. c. 128A, §§ 2, 3(i), 5C and 11C; and M.G.L. c. 128C.



AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this amended small business impact statement in accordance with G.L. c. 30A, § 5 relative to the proposed promulgation of **205 CMR 17.00: Review of a Proposed Transfer of Interests in a Racing Meeting License**. A public hearing was held on September 8, 2026, discussing the proposed regulation.

These amendments apply directly to the regulation of licensees conducting racing in the Commonwealth, and prospective licensees. Accordingly, these proposed regulation is not likely to have a negative impact on small businesses. These regulations are authorized by G.L. c. 128A, §§ 9 and 9B.

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

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

Presently, there are no less stringent compliance or reporting requirements for small businesses.

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

The proposed regulation does not impose any reporting requirements for small businesses.

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

The 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 for any individuals licensed by the Massachusetts Gaming Commission to conduct racing in the Commonwealth of Massachusetts, and for prospective licensees to be aware of the requirements concerning a transfer of interests.



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

The regulation is not likely to deter or encourage the formation of new businesses in the Commonwealth at this time.

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

To the extent that a prospective licensee(s) is considered small businesses, there is a possibility that the regulation could impact small businesses, however, these regulations are not likely to adversely impact small businesses.

Massachusetts Gaming Commission

By:



/s/ Judith Young
Senior Associate General Counsel

Dated: November 27, 2026



Massachusetts Gaming Commission



Legal Division

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

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

CC: Kevin Scanlon, General Counsel

RE: Amendments to the *Authorized Rules of Roulette*

DATE: September 24, 2026

Overview:

The Authorized Rules of Roulette ("Rules") are being proposed for amendment by the Gaming Agents Division and the Legal Division. In accordance with 205 CMR 147.03, changes to table games rules require a vote of the Commission. If approved, the amendments will take effect after being uploaded online and the Rules are shared with the Gaming Licensees.

Proposed Changes:

The proposed amendments include the addition of two provisions within Section 5 of the Rules concerning irregularities. These two additions will provide notice of the appropriate procedure that will be taken for when an irregular outcome occurs during gameplay. This includes when a ball leaves the roulette wheel, or the table; and instances when a ball fails to drop into a numbered compartment, also known as a "floater". These additional procedures will provide notice to patrons of how dealers and game supervisors in the table games area will respond to if these outcomes occur during gameplay. An amended copy of the Rules has been included in the packet for Commissioners' review.



Massachusetts Gaming Commission

ROULETTE

Rules

1. Placement of wagers; permissible and optional wagers

- (a) All wagers at roulette shall be made by placing gaming chips or plaques and if applicable, a match play coupon, on the appropriate areas of the roulette layout, except that verbal wagers accompanied by cash may be accepted provided that they are confirmed by the dealer and that the cash is expeditiously converted into gaming chips or plaques in accordance with the regulations governing the acceptance and conversion of such instruments.
- (b) No person at a roulette table shall be issued or permitted to game with non-value chips that are identical in color and design to value chips or to non-value chips being used by another person at that same table. Additionally, no person shall be permitted to wager a value chip with a match play coupon at any roulette table at which match play coupons are being accepted.
- (c) Each player shall be responsible for the correct positioning of his or her wager on the roulette layout regardless of whether he or she is assisted by the dealer. Each player must ensure that any instructions he or she gives to the dealer regarding the placement of a wager are correctly carried out.
- (d) Each wager shall be settled strictly in accordance with its position on the layout when the ball falls to rest in a compartment of the wheel.
- (e) The permissible wagers in the game of roulette shall be:
 - (1) "Straight" is a wager that the roulette ball will come to rest in the compartment of the roulette wheel that corresponds to a single number selected by the player. The player shall select a number by placing a wager within the box on the roulette layout that contains the selected number.
 - (i) A gaming licensee may, in its discretion, offer to every player at a roulette table the option to make five simultaneous straight wagers by selecting five adjacent numbers on the roulette wheel.
 - a. Any gaming licensee offering this "five adjacent number" option shall use an approved roulette table layout that includes a replica of the roulette wheel on the layout.
 - b. A player shall make a "five adjacent number" wager by placing five gaming chips or plaques, or a multiple thereof, on the number indicated on the roulette wheel replica that is the center number of the five adjacent numbers being selected. A player making a "five adjacent number" wager shall be deemed to have made a separate "straight" wager of equal value on each of the five numbers selected.
 - (2) "Split" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to either of two numbers selected by the player. The player shall select the numbers by placing a wager on the line between the two boxes on the roulette layout that contain the two selected numbers, except that a split wager on "0" and "00" may also be placed on the line between the "2nd 12" box and the "3rd 12" box.

- (3) "Three numbers" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of three numbers in a single row on the roulette layout selected by the player. The player shall select a row of numbers by placing a wager on the outside line of the box on the roulette layout that contains the first number in the selected row.
- (i) "Three numbers" shall also include a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of the three numbers contained in one of the following groups of numbers: "0", "1" and "2"; "0", "2" and "00"; or "00", "2" and "3".
- (ii) The player shall select one of the "three numbers" wagers identified in (e)(3)(i) above by placing a wager on the common corner of the three boxes containing the selected numbers.
- (4) "Four numbers" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of four numbers in contiguous boxes on the roulette layout selected by the player. The player shall select the four numbers by placing a wager on the common corner of the four boxes containing the selected numbers.
- (5) "First five numbers" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of the numbers "0", "00", "1", "2" or "3". The player shall bet on the "first five numbers" by placing a wager on the common corner of the boxes on the roulette layout that contains the label "1st 12" and the numbers "0" and "1".
- (6) "Six numbers" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to:
- (i) Any one of six consecutive numbers contained in two contiguous rows of numbers on the roulette layout selected by the player, who shall select the two rows of numbers by placing a wager on the outside common corner of the boxes on the roulette layout that contain the first number in each of the rows being selected; or
- (ii) If the gaming licensee, in its discretion, offers the six numbers color wager, the matching color (black, blue, gold, red, purple or green) on the roulette layout selected by the player, who shall select a color by placing a wager within the area on the roulette layout designated for the color wager being selected.
- (7) "Seven numbers color wager" is a wager on a single-zero roulette wheel that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to the single-zero compartment or to any one of six numbers contained in a specific section of the roulette wheel of the matching color (black, blue, gold, red, purple or green) on the roulette layout selected by the player, who shall select a color by placing a wager within the area on the roulette layout designated for the seven numbers color wager being selected.
- (8) "Eight numbers color wager" is a wager on a double-zero roulette wheel that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to the single-zero compartment, the double-zero compartment or to any one of six numbers contained in a specific section of the roulette wheel of the matching color (black, blue, gold, red, purple or green) on the roulette layout selected by the player, who shall select a color by placing a wager within the area on the roulette layout designated for the eight numbers color wager being selected.

- (9) "Column" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of 12 numbers contained in a single column on the roulette layout selected by the player. The player shall select a column of 12 numbers by placing a wager in the box on the roulette layout that is at the bottom of the column being selected.
- (10) "Dozen" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of 12 consecutive numbers from "1" through "12", "13" through "24" or "25" through "36" selected by the player. The player shall select the 12 numbers by placing a wager in the box on the roulette layout labeled "1st 12" ("1" through "12"), "2nd 12" ("13" through "24"), or "3rd 12" ("25" through "36").
- (11) "Red" is a wager that the roulette ball will come to rest in any compartment of the roulette wheel that corresponds to a number with a red background on the roulette wheel. The player shall bet on "red" by placing a wager within the red box on the roulette layout used for such wagers.
- (12) "Black" is a wager that the roulette ball will come to rest in any compartment of the roulette wheel that corresponds to a number with a black background on the roulette wheel. The player shall bet on "black" by placing a wager within the black box on the roulette layout used for such wagers.
- (13) "Odd" is a wager that the roulette ball will come to rest in any compartment of the roulette wheel that corresponds to an odd number. The player shall bet on "odd" by placing a wager within the box on the roulette layout that is labeled "Odd".
- (14) "Even" is a wager that the roulette ball will come to rest in any compartment of the roulette wheel that corresponds to an even number. The player shall bet on "even" by placing a wager within the box on the roulette layout that is labeled "Even".
- (15) "1 to 18" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of 18 consecutive numbers from "1" through "18". The player shall bet on "1 to 18" by placing a wager within the box on the roulette layout that is labeled "1 to 18".
- (16) "19 to 36" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of 18 consecutive numbers from "19" through "36". The player shall bet on "19 to 36" by placing a wager within the box on the roulette layout that is labeled "19 to 36".
- (f) Notwithstanding (e) above, a gaming licensee may, in its discretion, offer to every player at a roulette table the option to make a "seven numbers" wager. "Seven numbers" is a wager that the roulette ball will come to rest in a compartment of the roulette wheel that corresponds to any one of the numbers "10", "11", "12", "13", "14", "15" or "33". The player shall bet on "seven numbers" by placing a wager within the area on the roulette layout that is designated for such wager and approved by the Commission.
- (g) A gaming licensee that offers the six numbers color wager in (e)(6)(ii) above, the seven numbers color wager in (e)7 above, or the eight numbers color wager in (e)(8) above shall not offer the red and black wagers in (e)11 and 12 above, respectively, at the same roulette table. A gaming licensee that offers the seven numbers color wager in (e)(7) above or the eight numbers color wager in (e) 8 above shall not offer the dozen wager in (e)(10) above at the same roulette table. A gaming licensee that offers the six numbers color wager in (e)(6)(ii)

above may offer the dozen wager in (e)(10) above at the same roulette table provided that neither the seven numbers color wager in (e)(7) above nor the eight numbers color wager in (e)8 above are offered at that roulette table.

2. Payout odds

- (a) No gaming licensee, its employees or agents shall pay off winning wagers at the game or roulette at less than the odds listed below:

Bets	Payout Odds
Straight	35 to 1
Split	17 to 1
Three Numbers	11 to 1
Four Numbers	8 to 1
First Five Numbers	6 to 1
Six Numbers	5 to 1
Seven Numbers	4 to 1
Eight Numbers	3 to 1
Column	2 to 1
Dozen	2 to 1
Red	1 to 1
Black	1 to 1
Odd	1 to 1
Even	1 to 1
1 to 18	1 to 1
19 to 36	1 to 1

- (b) When roulette is played on a double zero wheel and the roulette ball comes to rest in a compartment marked zero (0) or double zero (00), a player shall lose, at the gaming licensee's option, either one-half of each wager on red, black, odd, even, 1 to 18, and 19 to 36 or the entire wager. If the former option is chosen by a gaming licensee, the remaining half of each such wager shall be returned to the player by the dealer. Each gaming licensee offering double zero roulette shall provide notice of the option in effect at the table in accordance with the provisions of 205 CMR 147.03.
- (c) When roulette is played on a single zero wheel and the roulette ball comes to rest in a compartment marked zero (0), wagers on red, black, odd, even, 1 to 18, and 19 to 36 shall be lost.

- (d) When roulette is played on a double zero wheel being used as a single zero roulette wheel, as provided in the gaming equipment regulations
 - (1) Notice shall be provided, in accordance with 205 CMR 147.03;
 - (2) The dealer shall announce "no spin," declare the spin void and respin the wheel if the roulette ball comes to rest in a compartment marked double zero (00); and
 - (3) Wagers on red, black, odd, even, 1 to 18 and 19 to 36 shall be lost if the roulette ball comes to rest in a compartment marked zero (0).

3. Rotation of wheel and ball

- (a) The roulette ball shall be spun by the dealer in a direction opposite to the rotation of the wheel and shall complete at least four revolutions around the track of the wheel to constitute a valid spin.
- (b) As a temporary rule in conjunction with Covid-19-related health and safety measures, all bets must be placed prior to the spin and a sign shall be placed at the table stating that no bets are allowed once the ball is in motion. The dealer shall wave their hand over the roulette layout prior to the spin and say in a clear and concise voice, "No more bets."
- (c) Upon the ball coming to rest in a compartment, the dealer shall announce the number of such compartment and shall place a point marker to be known as a "crown" or "dolly" on that number on the roulette layout.
- (d) If a gaming licensee offers the "five adjacent numbers" wagering option authorized by Section 1, the dealer shall then move one-fifth of each winning "five adjacent numbers" wager from the roulette wheel replica on the layout to the box on the main roulette layout that contains the single number corresponding to the compartment in which the roulette ball came to rest.
- (e) After placing the crown on the layout and, if applicable, complying with the provisions of (d) above, the dealer shall first collect all losing wagers and then payoff all winning wagers.

4. B2B bonus wager

- (a) Players make the optional B2B bonus wager in the marked area for any amount within table limits set by the gaming establishment. This must be done before the dealer calls "No more bets."
- (b) B2B payouts are determined by multiplying the random number generator multiplier displayed on the roulette reader board, and a winning B2B wager amount.
- (c) The multiplier will be shown on the roulette reader board for everyone to see during the spin, but prior to the ball landing.
 - a. Ex. If the random number generator lists the multiplier on the roulette reader board as X10, and the winning B2B wager is \$5.00, the winning B2B amount paid to the player that made the B2B wager would be \$50.00.

- (d) B2B wins if the winning roulette number is the same as the number that came up in the prior spin.
- (e) B2B loses if the winning roulette number is different than the number that came up in the prior spin.
- (f) When B2B wins, the dealer will resolve all the traditional bets as well as paying winning B2B wagers based on the amount determined by the multiplier listed on the roulette reader board.
- (g) Paytables will be listed on the table.

5. Irregularities

- (a) If the ball is spun in the same direction as the wheel, the dealer shall announce "No Spin" and shall attempt to remove the roulette ball from the wheel prior to its coming to rest in one of the compartments.
- (b) If the roulette ball does not complete four revolutions around the track of the wheel, the dealer shall announce "No Spin" and shall attempt to remove the ball from the wheel prior to its coming to rest in one of the compartments.
- (c) If a foreign object enters the wheel prior to the ball coming to rest, the dealer shall announce, "No Spin" and shall attempt to remove the ball from the wheel prior to its coming to rest in one of the compartments.
- (d) If the ball leaves the wheel, if possible, the dealer will retrieve the ball. If the dealer is not able to retrieve the ball, a supervisor should be notified immediately. The ball must be inspected by a games supervisor before placing it back in play. The dealer may not leave the table to retrieve the ball.
- (e) If the ball becomes suspended and appears to float above the compartments without dropping into a numbered compartment, the dealer or game supervisor shall announce or call out, "Floater—No Spin." If the ball fails to drop into a numbered compartment, the dealer shall remove the ball from the wheel.