



Massachusetts Gaming Commission Meeting Minutes

Date/Time: February 28, 2023, 11:00 a.m.
Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 1431 1966

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

Commissioners Present:

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

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

Chair Judd-Stein called to order the 438th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

2. [Sports Wagering](#) (00:53)

a. Finalization of Temporary Licensing Process for Digital Gaming Corporation

Executive Director Karen Wells stated that DGC had submitted their request for a temporary sports wagering license and the \$1 million temporary licensing fee. She stated that she had made the determination in her role as Executive Director that DGC was a qualified gaming entity. Director of Sports Wagering Bruce Band stated that DGC anticipated a start date in quarter one of 2024.

Commissioner Hill moved that pursuant to G.L. Chapter 23N, § 6(c)(2) and 205 CMR 219.00, the Commission issue a temporary sports wagering license to Digital Gaming Corporation d/b/a

Betway, an authorized digital gaming corporation, to conduct sports wagering for the period of one year under a temporary license or until a final determination on its operator's license application was made. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

3. [Legal](#) (3:36)

Deputy General Counsel Caitlin Monahan stated that public comments on regulation amendments had been received the morning of the meeting. She stated that the legal team and outside counsel would address comments received prior to this date during this meeting and that the new comments would be addressed at the meeting the following day.

a. [205 CMR 254](#): Temporary Prohibition from Sports Wagering: Regulation and Amended Small Business Impact Statement (5:07)

Outside counsel from the law firm Anderson and Krieger, Attorney David Mackey explained that 205 CMR 254 governed voluntary temporary prohibition from sports wagering. The *amended small business impact statement, draft 205 CMR 254, and public comments* were included in the Commissioner's Packet on pages 212 through 224.

Mr. Mackey explained that the initial version of the regulation had specified durations for temporary prohibition. He stated that the regulation was changed in response to Commission discussion and public comments received and that it was revised to allow patrons to select the period of time for temporary prohibition. He stated that this language was more flexible for the patrons and licensees.

Mr. Mackey stated that the patrons had to be notified upon enrollment that temporary prohibition was available. He noted that the provisions regarding notification of the ending of the temporary prohibition period were removed due to comments that the notification could cause an undesired negative effect,

Mr. Mackey stated that 205 CMR 254.05, the provision related to sanctions, was also removed as sanctions were adequately covered by 205 CMR 232. He noted that a comment was received that stated patrons in the temporary prohibition period should be able to access their accounts to withdraw funds, review their wagering history, and extend the cooling-off period. He stated that the temporary prohibition would prevent making deposits or placing wagers.

Director of Research and Responsible Gaming Mark Vander Linden stated that an opt-in notification would be discussed at a roundtable discussion. Chair Judd-Stein stated that the present recommendation was that there not be a notification, but that the Commission could reintroduce a notification requirement.

Commissioner O'Brien asked if Director Vander Linden was comfortable with no notification requirement for the March 10, 2023, category three sports wagering operator launch. Director Vander Linden replied that he was comfortable with no notification requirement and stated that temporary prohibition was important as a responsible gaming tool. Director Vander Linden stated that he supported exploring the notification requirements further if the operators were given development time to get the feature working.

Commissioner Skinner asked if the use of 'may' in 205 CMR 254.02(3)(c) should be changed to 'shall'. She expressed that she thought it was reasonable to adjust the language to shall in this provision. Chair Judd-Stein asked if this language would reflect what the Commission does for the voluntary self-exclusion list. Director Vander Linden stated that it was handled this way with voluntary self-exclusion and that he agreed with Commissioner Skinner's suggestion. Mr. Mackey agreed with Commissioner Skinner and stated that the Commission would not want possible confusion where operators could read this regulation ambiguously.

Commissioner Skinner asked to review the public comments which were not recommended for adoption. Mr. Mackey stated that proposed changes to the regulation to allow patrons access to their account to withdraw funds, review their wagering history, or extend their temporary prohibition period during their temporary prohibition were based upon the first comments by BetMGM.

Mr. Mackey explained that a comment had requested a change to the length of the temporary prohibition period. He stated that the time periods were changed to be as flexible as possible without specifying a period of time.

Mr. Mackey explained that the next comment was regarding the concern that reaching out to notify a player that their cooling-off period was expiring could have the unintended consequence of getting the patron excited to gamble again. He noted that the notification provision had been struck, and that the Commission was going to hold a roundtable discussion to see if the positives of the notification would outweigh the potential unintended consequences.

Mr. Mackey stated that BetMGM had commented on 205 CMR 254.03(1) stating that the minimum temporary prohibition period in most other jurisdictions was 72 hours. He noted that BetMGM's comment identified Maryland as having a shorter 24-hour temporary prohibition period. He stated that the current regulation, as drafted, did not have any minimum temporary prohibition period and that the language was drafted to be as flexible as possible.

Commissioner Skinner expressed concern regarding the patron's ability to enter a retail operator's establishment during their cooling-off period. She asked the Commission to consider additional guardrails. Mr. Mackey stated that kiosks were initially considered for this regulation

but were eventually eliminated due to technological challenges. Commissioner Skinner stated that it could be a future consideration.

Mr. Mackey explained that several of the comments were concerns related to the notification requirement which had since been removed. He stated that one comment suggested removing the word 'recklessly' from 205 CMR 254.05 but noted that 205 CMR 254.05 had since been struck, and moved to 205 CMR 232. He reported that the last comment was from a private citizen who suggested that the cooling-off period could be administered by the Commission in such a way that the patron could have the cooling-off period apply to all licensees.

Director Vander Linden stated that the immediateness of the cool-off period was important, and that doing it through the Commission would cause a delay between when the information was gathered and disseminated to the operators. He stated that individuals could apply for the voluntary self-exclusion list if they wanted it applied to each operator.

Commissioner O'Brien stated that the comments on 205 CMR 254.05 should be cross-referenced to 205 CMR 232. Mr. Mackey stated that the one comment on that provision was related to the reckless standard, and that 205 CMR 232.02 was already broader to capture any violation.

Chair Judd-Stein asked if any of the new comments submitted the morning of the meeting were related to this provision. Deputy General Counsel Carrie Torrisi stated that the five comments received had three comments relative to the notification process which was already addressed and two comments that required further review. Chair Judd-Stein expressed that she wanted to allow Director Vander Linden to have the opportunity to do research and have more input on the notification issue.

b. [205 CMR 138](#): Uniform Standards of Accounting Procedures and Internal Controls for Gaming: Regulation and Amended Small Business Impact Statement for final review and possible adoption (41:38)

Attorney Mina Makarious from Anderson and Krieger presented the changes made to 205 CMR 138. He stated that it was an existing regulation regarding internal controls and that the changes were to update the regulation for sports wagering. He stated that no changes had been made since no comments were received until the morning of the meeting. He stated that the one comment received was regarding 205 CMR 138.05, and that the remainder of the comments were related to 205 CMR 138.73. He noted that Gaming Laboratories International ("GLI") were instrumental in drafting this regulation and that he wanted to review the comments regarding 205 CMR 138.73 with them before the meeting the following day.

Mr. Makarious explained that DraftKings had submitted a comment suggesting additional language be added to 205 CMR 138.051(d) as it may be difficult to terminate or suspend an employee within twenty-four hours of Commission notice that the employee's license or registration was suspended. He stated that DraftKings cited concerns regarding labor laws and professional contracts. He noted that adding this language to 205 CMR 138 would change the relevant provision for both gaming and sports wagering.

Commissioner O'Brien noted that the regulation had used this language for six years without a licensee raising any issues regarding it. She stated that suspending would incorporate the changes DraftKings suggested. Commissioner Skinner stated that the proposed language would allow the employee to shift to another role that did not require the same licensure. Mr. Makarious stated that suspension had been read in the past to include this option, and that he believed the current language would have the same effect as the suggested language. Commissioner Hill stated that he could see it being an issue if it was raised by an existing licensee rather than a new licensee.

Chair Judd-Stein stated that the language could help clarify the issue, but it would not necessarily change the provision. Commissioner O'Brien expressed that she was not comfortable with the phrasing provided by DraftKings as there was not a clear definition of "relevant responsibilities". Chair Judd-Stein stated that this comment could be reviewed in the next meeting with input from the licensing division.

Commissioner Skinner inquired as to why this language was not found in 205 CMR 238.05 as it was relevant to sports wagering. Mr. Makarious stated that this provision was applied to sports wagering employees by reference rather than creating a new provision.

Commissioner Skinner suggested removing the term "for gaming" from the title of 205 CMR 238 to clarify that the regulation was for both sports wagering and gaming. Mr. Makarious agreed, stating that 205 CMR 238 could also be retitled to clarify that it was additional standards for sports wagering.

Chair Judd-Stein stated that the statutory change to General Law Chapter 23K allowed the Commission to exempt service workers from licensure and asked if that change also applied to sports wagering. Executive Director Wells stated that the levels of licensure and registration in sports wagering applied to higher positions, and that similar positions under sports wagering would not require exemption. Mr. Makarious stated that the comments pertaining to 205 CMR 138.73 would be addressed in the public meeting the following day.

c. [205 CMR 238](#): Uniform Standards of Accounting Procedures and Internal Controls for Sports Wagering: Regulation and Amended Small Business Impact Statement for final review and possible adoption

Mr. Makarious presented the changes to 205 CMR 238. The *Amended Small Business Impact Statement, draft 205 CMR 238, and public comments* were included in the Commissioner's Packet on pages 101 through 155.

Mr. Makarious stated that this regulation was regarding sports wagering specific internal controls, and as just discussed would be retitled to "Additional uniform standards of accounting procedures and internal controls for sports wagering" for clarification. He stated that a new provision was added to the end of 205 CMR 238.02(d) in response to comments received at the sports' governing bodies roundtable related to a process for reporting to the governing body the violations of sports wagering done by athletes. He noted other changes from the roundtable

included the sports wagering operator's maintaining confidentiality of information provided by the sports' governing bodies, the requirement that the governing bodies will maintain confidentiality while the investigations are pending, and additional categories for when it was appropriate to have disclosure of that information.

Mr. Makarios noted that language was added to 205 CMR 238.02 to account for tethered operators. He stated that BetMGM had submitted a comment requesting changes to how data security would be addressed. He stated that this issue was already adequately addressed and that operators have the potential to request a waiver.

Mr. Makarios noted that operators had asked whether they were expected to create a trust vehicle on top of the segregated accounts requirement. He stated that the language was adopted by other jurisdictions and that it was not clear that a trust account was necessary for the regulation. Commissioner Skinner asked how the legal team was responding to questions it received in public comments. Deputy General Counsel Monahan stated that the questions were being answered in the various areas they were sent in, and that similar questions were being addressed in group responses.

Chair Judd-Stein asked if a trust vehicle requirement would inhibit operators from applying payment processor reserve receivables to the reserve requirement. Deputy General Counsel Monahan replied that she would look into that issue, and report back to the Commission. Chair Judd-Stein asked if the operators would be required to cash fund this portion of the reserve and stated that GLI and the Sports Wagering Division could work with the Legal Division and outside counsel on this question. Mr. Makarios stated that his view was that a trust fund was not required, but that establishment of a mechanism to ensure patrons get their money back was.

Mr. Makarios stated that BetMGM requested a change to 205 CMR 238.12 to allow different corporate restructuring rather than prohibition from dissolving with unsatisfied obligations to patrons. He stated that as a policy matter, the regulation was concerned about protecting patrons, and that operators could apply for relief in the case of a corporate restructuring.

Mr. Makarios stated that a comment requested eight hours' notice prior to a Commission audit. He stated that there could be concerns about reserves being added within the eight-hour period; and stated that this change was not recommended. He answered a question from the comments clarifying that 205 CMR 238.14(3) required that any error be reported to the Commission, not just ones that led to the voiding or cancelling of wagers. Chair Judd-Stein asked if the reports would go to the Sports Wagering Division or the Investigations and Enforcement Bureau ("IEB"). Executive Director Wells stated that there would be coordination between the IEB and Sports Wagering Division.

Mr. Makarios stated that a comment had requested the term 'vendor' be changed to 'integrity monitor' in 205 CMR 238.18(1). He stated that vendor covered integrity monitors and that the IEB was considering another potential regulation regarding integrity monitors. Chair Judd-Stein stated that the term vendor includes integrity monitors.

Mr. Makarios stated that a comment suggested the language in 205 CMR 238.18(2)(d)(2) be changed to only report actual breaches to the sports' governing bodies. He stated that the governing bodies might want to be apprised of information on athletes who were caught trying to place bets before they were successful with the plan. He suggested no change be made.

Mr. Makarios stated that a comment requested the language "evaluate or" be struck from 205 CMR 238.18(5), based upon the concern that this would allow the Commission to perform its own integrity monitoring. He noted that the suggested change would not be adequate to ensure sufficient controls on software and hardware and recommended against making this change.

Mr. Makarios presented a comment requesting that the Commission only request Massachusetts-specific reports on abnormal betting activity in 205 CMR 238.18(5)(a). He stated that information from other states could assist the Commission in seeing larger problems and patterns. He recommended rejecting the suggested change.

Mr. Makarios stated that a comment was received suggesting that 205 CMR 238.22 be changed to allow operators to respond ten business days after the completion of their investigation rather than after ten business days. He stated that this would create an open-ended timeline for responding to complaints and recommended against adopting this suggestion. He stated that a suggestion was made to remove the requirement of operators to request specific additional information from the complainant if a complaint was too vague. He stated that this was an important provision and that he did not recommend removing it.

Mr. Makarios stated that a comment was received relative to 205 CMR 238.22(7) suggesting the term 'promptly' be changed to 48-hours. He stated that 'promptly' gives more flexibility for fact-gathering and recommended against the suggested change. He noted that another suggested change was requiring the patron to notify the Commission that a complaint has not been resolved. He recommended keeping the language as it was. Commissioner Skinner asked how a patron would be able to file such a complaint. Executive Director Wells stated that the patrons could use the Fair Deal Hotline, the Commission website, or report it directly to a gaming agent. She stated that the operator should also have an internal system for complaints from patrons.

Mr. Makarios stated that a new comment received the morning of the meeting was also regarding this section, and that DraftKings stated they did not have a way of knowing if a complaint had been resolved to the satisfaction of a patron. Mr. Makarios stated that a process should be in place and that the operators could ask patrons if they are satisfied with how the complaint was handled.

Mr. Makarios stated that many comments had requested changes to standards regarding violations to be based on actual and constructive knowledge. He stated that knowledge factors into enforcement proceedings, but it also sets a standard that allows operators to look the other way. He recommended against adopting these changes.

Mr. Makarios noted that a commenter requested a reasonableness standard be applied to 205 CMR 238.33(1)(h). He stated that the request misinterpreted the purpose of that language, as it

was used to capture categories that were not listed. In response to a question posed in one of the public comments, Mr. Makarios clarified that under 205 CMR 238.35, it was mandatory to cancel wagers. Chair Judd-Stein asked where the commenter's confusion stemmed from. Mr. Makarios stated that the comments questioned an implied ability to not cancel a bet, but that canceling was mandatory as written. He stated that removing the word "only" could help further clarify this provision. Commissioner Skinner asked if there were situations where the operator had discretion to cancel. Mr. Makarios stated that there was no discretion for the operator in subsections a through k.

Mr. Makarios stated that a comment was received from Plainridge Park Casino ("PPC") suggesting that the regulation be changed to allow wagers with a potential payout over \$10,000 to be taken at sports wagering kiosks. He stated that he discussed this matter with GLI, and that the regulation as written has stronger protections. Commissioner Maynard stated that during his tour of PPC, General Manager North Grounsell had explained that it was easy to have wagers reach the \$10,000 limit due to parlay wagers with several legs. He stated that the payout threshold may prove cumbersome to patrons.

Sports Wagering Operations Manager Sterl Carpenter stated that any payout over \$10,000 must go to the sportsbook window to cash out. He added that kiosks cannot make payouts over \$5,000, due to taxation purposes.

Chair Judd-Stein sought clarification as to what the proposed change encompassed. Sports Wagering Operations Manager Carpenter stated that it was possible for parlay wagers with eight or nine legs to turn a five-dollar bet to a \$10,000 taxable event. He stated that the regulation, as written, the patron would have to place the wager with the sportsbook window. Commissioner Maynard stated that it seemed unnecessary to prevent the wager from happening at the kiosk when the payout would have to occur at the window. He expressed concern that not allowing these wagers at the kiosk would lengthen the queue at the sportsbook.

Mr. Makarios stated that the language suggested in the comment seemed to be a compromise, but that the compromise seemed to be more confusing than the policy decision. Commissioner Hill stated that he agreed with Commissioner Maynard. Mr. Makarios stated that the suggested language would have the same effect as removing the provision. He stated that deleting the provision would allow the wagers to be placed at kiosks and the payout at the ticket counter.

Sports Wagering Operations Manager Carpenter noted he had received similar questions from Encore Boston Harbor and MGM Springfield. He agreed that the wager should be allowed to be placed on a kiosk. Commissioner Skinner asked what the proposed change was from the legal team. Mr. Makarios stated that there was a policy issue of whether to allow these bets with larger payouts on the kiosks by deleting the provision in 2(b) or to retain the language as was.

Commissioner O'Brien asked if there was a way for kiosks to capture who placed the bets. Sports Wagering Operations Manager Carpenter stated that monitoring payouts for slots or table games was easier as the event was instantaneous whereas sports wagering tickets could be held for up to one year and sometimes get transferred as gifts. Commissioner O'Brien asked if could

be done on an advanced deposit wagering account online. Sports Wagering Operations Manager Carpenter stated that mobile operators would not have this issue. Commissioner O'Brien expressed concern that striking this provision would result in further attempts to circumvent tax obligation or child support obligations.

Chair Judd-Stein noted that there was surveillance over the kiosks. Commissioner O'Brien stated that footage was not kept in perpetuity and there was the issue that wagers could be redeemed up to one-year later. Commissioner Skinner stated that the reporting requirements for taxable events were lower than the \$10,000 threshold already, and that the threshold amounts may be a larger discussion outside of the context of 205 CMR 238.

Sports Wagering Operations Manager Carpenter stated that bets are anonymous when placed at the windows, and that the kiosks have the exact same controls. Commissioner Maynard expressed that patrons should not have to bet at the window if there were no additional controls in comparison to the kiosks. Commissioner O'Brien stated that maximizing delinquencies in taxes and child support was a policy question beyond the scope of 205 CMR 238. Commissioner Skinner agreed with Commissioner O'Brien's concern but added that the elimination of this provision would not likely make much of a difference. Chair Judd-Stein stated that the Commission could further consider removing this provision prior to the vote in the following day's public meeting.

Mr. Makarios stated that BetMGM suggested that the language in 205 CMR 238.44(3) be modified from medium risk on the common vulnerability scoring system to high risk. He recommended against accepting this change as the Commission wants to be more protective. He noted that the next suggested change was a corresponding change with an absence of justification for the change. He recommended against adopting these two changes.

Mr. Makarios stated that a comment suggested the language in 205 CMR 238.452 be changed to include confidential proprietary information of the operator. He noted that the internal controls are meant to protect patrons and that if an operator wanted to protect that information it can be done through internal HR policies, employment policies, and security policies. He stated that as it was an internal matter between the operator and employees, he did not recommend adopting the change.

Mr. Makarios stated that a comment suggested changes to 205 CMR 238.48(1)(a) requesting that operators transfer the money to the sports wagering control fund on an annual basis. He stated that this was not consistent with the purpose of the statute, and with sufficient automation, transfers to the sports wagering control fund could be made on a regular basis. Mr. Makarios stated that a similar request was submitted for 205 CMR 238.48(3) and recommended that it would be best for the Commission and Commonwealth to receive these transfers on a regular basis. He recommended against adopting either of these changes.

d. [205 CMR 247](#): Uniform Standards of Sports Wagering: Regulation and Amended Small Business Impact Statement for final review and possible adoption (2:18:01)

Attorney Paul Kominers from Anderson and Krieger presented the changes to 205 CMR 247.00. He explained that this regulation addressed how the Commission permits or prohibits wagers on certain events or categories of events and how operators accept wagers. The *amended small business impact statement, draft of 205 CMR 247, and public comments* were included in the Commissioner's Packet on pages 157 through 186.

Mr. Kominers stated that one proposed edit was based on a comment from a member of the public who requested that previous versions of the house rules be available to the public. He recommended this change. Commissioner Skinner said she was happy to see this change incorporated.

Mr. Kominers stated that a comment suggested 205 CMR 247.09(2) be changed as the extensive disclosure of terms of promotions would be impossible in some formats. He stated that the suggested change would ease the requirements so that all material terms would be on the face of the advertisement with all terms within one click away. He stated that the language was adapted from Virginia, which allowed operators to hyperlink the terms of the promotion in online advertising.

Commissioner O'Brien stated that there was a jurisdiction that stated if the terms of a promotion could not fit in a medium, then it was not the proper medium for the promotion. She stated that this would prevent patron confusion, and that she believed the jurisdiction that used this language was either Ohio or Maine.

Mr. Kominers stated that there were related restrictions in the advertising regulation, 205 CMR 256.00. He stated that the issue seemed to be whether extremely small font size or the abbreviation of terms was sufficient for full and accurate disclosure. Commissioner O'Brien stated that it may not be the proper medium for the promotion if the terms cannot be obviously and prominently displayed. Chair Judd-Stein noted that the Commission heard several complaints related to the font size of billboard, but that the Commission only heard from one operator on this issue. Mr. Kominers stated that he would cross-reference the comments from 205 CMR 256.00 prior to the Commission's review at the next meeting.

Mr. Kominers stated that BetMGM's comment regarding 205 CMR 247.09 would be addressed at the next day's meeting. He stated that a public comment was received requesting the Commission to approve certain classes of esports for wagering and to identify entities as esports governing bodies. He expressed that he appreciated the input, but that this comment could be addressed when the Commission revisited the approval of esports events in the future.

In response to questions from BetMGM, Mr. Kominers clarified that operators cannot offer bets on collegiate events that are dependent upon the performance of a single player. He stated that the statute language was clear, and that no clarification was needed in the regulation. He clarified that the absence of location-based qualifying language meant that operators could offer wagering on tournaments located in Massachusetts and other states.

Mr. Kominers stated that a member of the public requested that the Commission restrain operators' ability to limit the amount individual players may wager. He stated that he was unsure of whether the proposed change was necessary or sufficient. He stated that it would be a major policy change and that he did not recommend the Commission address the issue at this point.

Mr. Kominers stated that another member of the public requested adding user-specific information to the information required to be available to the public. He recommended against adopting this change.

Mr. Kominers stated that a comment requested that the operators have seven days to respond to a sports governing body or player association limiting wagers on events. He stated that this would limit the ability of the Commission to respond to emergency requests and that he did not recommend adopting this change.

Mr. Kominers stated that another comment recommended the Commission instruct operators not to retain personally identifying information ("PII") longer than was lawful. He noted that it was already unlawful to retain and did not recommend the Commission adopt this comment.

Mr. Kominers noted that another comment from BetMGM responded to an old version of the regulation, and that the language they requested the Commission change was already changed during the adoption of 205 CMR 247.00. He noted that the remaining comments requested to insert knowing and reasonableness standards, and that he generally recommended rejecting those requests.

Chair Judd-Stein stated that 205 CMR 248.00 and the additional comments received the morning of this meeting would be addressed in the public meeting during the next day.

4. [Commissioner Updates](#) (2:40:49)

There were no Commissioner updates presented at this meeting.

5. [Other Business](#) (2:41:32)

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

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Maynard: Aye.

Chair Judd-Stein: Aye.

The motion passed unanimously, 5-0.

List of Documents and Other Items Used

1. [Revised Notice of Meeting and Agenda](#) dated February 24, 2023
2. [Commissioner's Packet](#) from the February 28, 2023, meeting (posted on massgaming.com)