



NOTICE OF MEETING AND AGENDA

Pursuant to the Massachusetts Open Meeting Law (G.L. c. 30A, §§ 18-25), St. 2022, c. 107, and St. 2023, c. 2, notice is hereby given of a public meeting of the **Massachusetts Gaming Commission**. The meeting will take place:

Tuesday | May 21, 2024 | 11:00 a.m.
VIA REMOTE ACCESS: 1-646-741-5292
MEETING ID/ PARTICIPANT CODE: 112 825 4566
All meetings are streamed live at www.massgaming.com.

Please note that the Commission will conduct this public meeting remotely utilizing collaboration technology. Use of this technology is intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public. If there is any technical problem with the Commission's remote connection, an alternative conference line will be noticed immediately on www.massgaming.com.

All documents and presentations related to this agenda will be available for your review on the morning of the meeting date by visiting our website and clicking on the News header, under the Meeting Archives drop-down.

PUBLIC MEETING - #517

1. Call to Order – Jordan Maynard, Interim Chair

2. Sports Wagering Operator Wager Limitations Roundtable
Participants will include representatives of Sports Wagering Category 1 and Category 3 operators, patron representatives and Responsible Gaming representatives.
 - a. Opening remarks and introduction of roundtable participants – Jordan Maynard, Interim Chair

 - b. Review of previous discussions related to wager limitations and comments



Massachusetts Gaming Commission

- iv. What would be the impacts to the industry if allowing limits on individual patrons was prohibited or limited by law or regulation?
- v. What are other jurisdictions and/or other sports books doing?

3. 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: May 17, 2024 | 11:00 a.m. EST

May 17, 2024



Jordan M. Maynard, Interim Chair

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



Massachusetts Gaming Commission



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

FROM: Andrew Steffen, Sports Wagering Operations Manager
Bruce Band, Director of Sports Wagering

MEMO **MEETING**

DATE: May 10, 2024 **DATE:** March 28, 2024

RE: Wager Limitations

INTRODUCTION:

Through public comment, a question has arisen as to whether a Sports Wagering Operator is authorized to limit the amount an individual patron may wager.

The Sports Wagering Division met with select operators and completed a thorough investigation, monitoring compliance with regards to how the Sports Wagering Operators limit the wagers of patrons.

REGULATION BACKGROUND:

Pursuant to [205 CMR 247.02](#), a sports wagering operator must adopt comprehensive House Rules for sports wagering. Under 247.02(3), the House Rules must address certain criteria at a minimum. Subsection 247.02(3)(l) addresses maximum payouts and establishing such limits, noting that: "such limits must only be established through limiting the amount of a Sports Wager and cannot be applied to reduce the amount paid to a patron as a result of a winning Sports Wager."

Additionally, pursuant to 205 CMR 247.08(1), unless otherwise directed by the Commission, there is no limitation as to the minimum or maximum wager a Sports Wagering Operator may accept. This rule does not preclude a Sports Wagering Operator from establishing its own wager limits or limiting a patron's wager for reasons considered necessary or appropriate.

OVERVIEW:

House Rules Excerpts –

- **BetMGM:**
 - BetMGM will determine the minimum and maximum wager amounts per patron on all events to include all periods, segments, propositions, and future book wagers. Maximum payout limits shall only be established through limiting the amount wagered and cannot be applied to reduce a winning wager amount.

- **Caesars:**
 - Management determines the minimum and maximum wagers on all events. The minimum wager amount may be as low as \$0.10. The maximum wager amount is \$1,000,000 which can be restricted or increased based on internal management review and approval, per customer, based on sport or event and includes all wager types.

- **DraftKings:**
 - DraftKings reserves the right to limit the maximum bet amount such that the net payout on any bet or combination of bets by one Authorized Account Holder does not exceed {\$500,000}. This limit may be lowered by DraftKings in DraftKings' sole discretion.
 - All bet selections are subject to pre-imposed limits set solely at DraftKings' discretion which may be lower than the limits mentioned in the Sport Specific Limits and/or mentioned elsewhere on DraftKings' platform. Should this limit be reached, the Authorized Account Holder has the right to ask for it to be exceeded by means of a request effected through DraftKings' platform. DraftKings reserves the right to accept (fully or partially) or reject the said request without any prior notice and further explanation.

- **ESPN Bet (PSI):**
 - The Operator reserves the right to make changes to the site, betting limits, payout limits and offerings. The Operator reserves the right to refuse any wager or delete or limit any selection(s) prior to the acceptance of the wagers.
 - In order to guarantee the viability of each market, to avoid potential cases of fraud and match-fixing, and to be able to make a correct estimate of the risk involved in each product offered, the Operator reserves the right to limit the net payout (the payout after the stake has been deducted) on any bet or combination of bets by one Account Holder for any bets placed or settled within a 24-hour timeframe.

- **Fanatics:**
 - For all events the maximum payout limits apply on a per day basis. The maximum payout limits refer to the total returns on your bets, excluding your original stake. The maximum payout limit applies on a personal basis, but where Fanatics Sportsbook has reason to believe that a customer has acted as a group to circumvent these limits and produce multiple accounts or retail tickets, we reserve

the right to limit this customer or group of customers to a single maximum payout.

- The maximum payout for all events is currently \$1,000,000, provided that this limit will be established through limiting the amount of a sports wager. This policy will not preclude any customer from collecting a payout more than these limits if Fanatics Sportsbook allows the customer to place a valid wager that pays more than the stated maximum amounts.
- FanDuel:
 - FanDuel Sportsbook reserves the right in its sole discretion not to accept certain Sportsbook bets, or to scale back the stakes (on a per user or aggregate basis). The minimum bet wager on all sports events shall be set to \$0.09 and the maximum bet wager on all sports events shall be set to \$5,000,000. FanDuel Sportsbook reserves the right to set a lower or higher maximum bet wager amount per customer for any offered event and/or wager type. Any bet limitations will be implemented at the time of bet placement.
- Encore Boston Harbor:
 - Management reserves the right to refuse any bet; or delete or limit any selection(s) prior to the acceptance of the bets.
 - Management will determine the minimum and maximum wagers on all events and can set a lower maximum wager amount or higher maximum wager amount per patron for any offered event and/or wager type. Patrons may fund wagers in cash or with a winning sports wagering voucher. Credit wagers of any type are not permitted.
- MGM Springfield:
 - The MGMS will determine minimum and maximum wagers on all sports events. Any maximum payout will only be established through limiting the amount of a Sports Wager and will not be applied to reduce the amount paid to a patron as a result of a winning Sports Wager.
- Plainridge Park Casino:
 - The Operator reserves the right to make changes to the site, betting limits, payout limits and offerings.
 - The overall minimum bet amount for retail wagers is \$5.00. The overall maximum bet amount for retail wagers up to \$10,000,000. Within these limits, the operator will determine the accepted stake amount for each wager based on the individual player and event factors. Pursuant to 205 CMR 247.08 (3), The Sportsbook at Plainridge Park may, in its discretion, permit a player to wager below the established minimum wager or above the established maximum wager.

DISCUSSION:

The Sports Wagering division has confirmed all operators meet the minimum requirements of 205 CMR 247.02(3)(l) and 205 CMR 247.08(1). While language differs from operator to operator, it is similar in nature and meets the minimum requirements of the regulation.

From: [Steve Williams](#)
To: [MGCcomments](#)
Subject: 3/28 Public Meeting Item 10a
Date: Wednesday, March 27, 2024 10:08:31 AM

You don't often get email from stevewilliams320@gmail.com. [Learn why this is important](#)

I look forward to watching these deliberations.

I have no doubt that sportsbooks' broad terms of service protect their ability to limit players and I don't doubt that they've given you many reasons such as multi-accounting, anti-money laundering, small illiquid markets as situations in which they limit. They are probably giving you every reason that they can to tell you that they don't limit players for using math & skill, making value bets, beating "closing line value" but these truths are widely known.

Please consider viewing this 5 minute exchange between a member of Australia parliament & a sportsbook CEO to illustrate: <https://twitter.com/jacksongs/status/1643140229262458880>

I wrote in during the promulgation process and recommended something to the effect that sportsbooks should be able to limit sharp and winning players up to 90% meaning if some losing player that is a great customer is allowed to place a bet of \$3000 on a market, a limited bettor should be able to place a bet of \$300. That just seems like a very reasonable policy as does requiring sportsbooks to have a "limit bet" button so that they can see what the maximum amount is that they could bet before hitting the bet button.

Lastly, the commission should consider writing in its next letter to the legislature that the tax code should a) require the online sportsbooks generate an annual W2G for *all* activity and b) that wins and losses should simply be netted together instead of currently having to separate them out on different areas of the form. These two things will make it easier for residents to include gambling info on tax forms and dramatically improve tax collections from winning players.

Thank you for your consideration.

From: [Vatsal Bhargava](#)
To: [MGCcomments](#)
Subject: Ban limiting players
Date: Wednesday, March 27, 2024 12:15:45 PM

[You don't often get email from vatsalbhargava2024@u.northwestern.edu. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

hi,

please take the time to help push the bill forward to ban limits. they have no problem letting people lose life earnings but can't cough up a few thousand?

From: [Michael Holt](#)
To: [MGCcomments](#)
Subject: Betting Discussion Input
Date: Wednesday, March 27, 2024 12:10:57 PM

You don't often get email from michael.holt.2121@gmail.com. [Learn why this is important](#)

Dear MGC,

Thank you for taking the time to discuss Sport Wagering Operator Wager Limitations.

It's an important topic, and I'd like to share my input from a recreational bettor point of view.

Sports betting is a hobby of mine, and as with any hobby, most people want to work at their craft and become successful at it. Success in sports betting is being profitable. Through my work of studying, learning, and experimenting, I have finally been profitable on several nationwide on-line sportsbooks. In turn, these sportsbooks have severely limited my maximum bet size (under \$10 for all of them).

I have never made multiple accounts or performed any fraudulent activity. I have only played by the sportsbooks rules, and through no fault of my own (except working hard) I am now limited in the profits I can make through my hobby.

While I understand sportsbooks are a 'for profit' business, limiting the small-time bettor just because of success seems discriminatory and predatory. On the flip side, I know that limits are in place to ensure the sportsbooks continue to be profitable and are not put out of business by large sports betting operations placing extremely large bets.

My proposed solution for you to consider is simple: The least a sportsbook can limit any account to for a single bet is \$100. In other words, sportsbooks would have to be able to take \$100 bets from all their customers.

This solution keeps the 'little guy' in the game as a successful recreational bettor, but protects the sportsbook from major players coming in and severely damaging their profitability.

Thank you for taking the time to review my input and considerations.

I'm open to discuss this further if you would like.

Sincerely,
Michael Holt

From: [Brendan Mahoney](#)
To: [MGCComments](#)
Subject: Comments for Public meeting #511 Thursday 3/28/2024
Date: Tuesday, March 26, 2024 9:17:10 PM

[You don't often get email from j.brendan.mahoney@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern,

My name is Brendan and I've been enjoying wagering on regulated MA sports gaming platforms since their launch around this time last year.

I noticed that an agenda item in the upcoming meeting was on "Sports gaming operator wager limitations"

Assuming that there will be discussion on sports operators' ability to impose wager limits at a player specific level (and if that's not the topic, apologies and feel free to disregard), I'd like to offer my perspective:

I've been fortunate enough to have won some money wagering on sports over the past year. Whether this is luck or skill is possibly still to be determined. However, what I have noticed is that since winning money, my ability to wager on some specific operators' platforms (ESPNbet and BetMGM) has been drastically reduced. I am only able to bet less than 10 dollars, and any bet above that will be rejected and reduced.

I'm an ordinary resident and ordinary player. I don't have any sort of fancy software or algorithm or anything, I bet largely football, soccer, and basketball.

What I've learned talking to friends is that my experience is not unique. While operators might say that they need to impose player-specific limits in order to combat "bots" or "software" or "syndicates." The reality is that many limitations are placed on ordinary citizens who have done nothing other than win some money.

While I have a lot of respect for the operators and what they are able to do in order to bring in tax revenue for the state, my concern is that this problem is only growing and could have a significant negative effect on operations and revenue in the future.

If word gets out that ordinary folk are seeing their wager sizes limited to dollars or pennies, this could heavily disincentivize other customers from wagering. Worst case scenario, you lose money, best case scenario, you win but you can't play anymore. These are tough parameters with which to operate and market an "entertainment" platform. I've had people ask me recently "why would I even bother signing up?"

I would propose that operators at least have a regulated individual player limitation (no worse than \$100 or \$200?). It could also be done as a percentage (maybe 10%) of the standard new customer limits they allow on a betting option. Operators can still feel free to ban players for violations of terms of service (including syndicate play), and of course should have problem gambling protections in place. However, for those who watch sports, place bets on a mobile app on the couch, and win money, I don't see how it's in the best interest of anyone to effectively restrict these players from using the platform.

Thank you for reading, and I appreciate your time and consideration!

Brendan

From: [Tim DeLouchrey](#)
To: [MGCComments](#)
Subject: Comments for Thursday's Agenda Item 10a. Wager Limits
Date: Wednesday, March 27, 2024 7:24:21 PM

You don't often get email from tim.delouchrey@gmail.com. [Learn why this is important](#)

Hi,

My name is Tim DeLouchrey and I'm a Dorchester resident. I am going to try and join Thursday's public meeting, though it unfortunately appears that my work schedule will interfere. In case I don't end up making it, I was hoping to submit a comment regarding Agenda Item 10a: Discussion on Sports Wagering Operator Wager Limitations. Since this is in writing, I've opted to say more, rather than less. Sorry for all of the text!

I also submit these in hopes that my identity will not be disclosed to the sportsbooks. I'm happy to talk more about this if it's a necessity. In general however, I think a lot of advantage players will fear speaking out on this issue if there's a chance sportsbooks will further retaliate against them by decreasing limits even further. Hopefully "Tim from Boston" works!

I have been using every sports wagering app in the state since the law went into effect last March, with the exception of Betr. I've also participated in retail wagering at Encore, Plainridge, and MGM.

Of the six remaining active apps (FanDuel, DraftKings, Caesars, BetMGM, Fanatics, ESPNBET), I am limited to varying degrees on all of them. I was also limited on WynnBet before it shut down. I want to clarify a couple of myths you'll likely hear from these companies as rationalization for why they have to limit winning bettors, as well as outline some ways that I think sportsbooks have effectively handled limiting that might provide a reasonable blueprint for a compromise going forward.

1. I often see sportsbooks telling investors and other stakeholders that they limit players who "search for error lines, abuse glitches in the platforms, or break the terms of service".

I'm sure that in some cases this is true, but the sportsbooks are not being completely truthful in the way they are presenting their case. As I said, I am limited on all 6 active sportsbooks, plus was on WynnBet. I have been limited for different reasons on each, some more reasonable than others (in my opinion).

In the interest of honoring agreements with my friends and connections in the "advantage play" community, I cannot fully disclose many of the exact examples of winning bets that got me limited in writing. I would be more than happy to discuss them in person with the assurance that the information provided was only for the improved operation of the committee's discussion of this issue.

With that caveat in mind:

On **DraftKings**, I first noticed major limits when betting into a market *exclusively offered by DraftKings*. These were not error lines -- I was still undertaking significant risk, but identified a wager that I thought was smart (using your brain to beat casino games is not illegal). I note

this because one way sportsbooks often fall back and say a line was "an error" and thus insinuate they shouldn't be held liable to pay out is by pointing to competitor sportsbooks and the lines they've offered as comparison. Since this particular market wasn't offered by other sportsbooks, they have no standing upon which they can claim I identified an obvious error. In fact, I had a negative return on these bets on the MLB season last year. But they didn't like that I was making large wagers into a niche market.

On **FanDuel**, I was using publicly available information and making wagers based on that information before the sportsbook could adjust and change their lines. Sometimes this was with a significant edge. I believe I was justly limited on FanDuel. One thing I appreciated and think other books could learn from: my only edge on FanDuel at the time was in MLB. I was limited to "1%" (I could wager 1% of what a new or normal account could) on FanDuel, but **only on MLB**. I could still bet 10% on NFL, NBA, etc. I think this is an appropriate reaction. Market-specific limiting seems fair to the player and the sportsbook.

On **Caesars**, I was betting into a market that Caesars was consistently pricing differently than the rest of the market. These lines, however, were not glitches. Caesars was "taking a stand", as it's called. There were legitimate reasons I was unsure if the edge I thought I had was actually good, or if Caesars was actually ahead of the curve on this concept, which had to do with a different type of correlation pricing in their NBA same-game-parlay engine (the same engine that exploits recreational players with an absurd and unbeatable amount of juice). The Caesars pricing actually made intuitive sense, but I thought it was overblown. Luckily, I won on these plays. I can now only bet \$10 on the NBA on Caesars, limits that frustratingly went into effect right as I was invited to their VIP program, which I cannot functionally participate in given my limits.

On **MGM**, I was limited for one specific wager that I don't mind sharing. I bet that the Baltimore Ravens would score 0 touchdowns in their January 6th game against the Pittsburgh Steelers. I was not doing so because I beat them to injury news or anything like that. Rather, the line had been up for a long time and I recognized it was the best price on the market and likely had some value in a rainy game. I tried to bet a lot of money on this, north of \$1,500 which is a lot in a niche market at +1200 odds. My bet went to review and was accepted for half of what I wanted to wager, but after that moment I am lucky to be able to wager more than \$30 on a bet. If you were curious, the Ravens did score a touchdown and MGM happily collected my \$750, an amount that will be nearly impossible to make back \$10, \$20, or \$30 at a time.

On **Fanatics**, I was pretty much instantly limited. There's not an exciting story or moment, I was just using bonus bets optimally (long shots increase your "conversion %"). I understand Fanatics is new. I'm sure they're hurting their own business model. I know players who are certainly recreational bettors that were limited after hitting a couple big bets. I can still bet \$10-20 on most things, which is 1-2% of what I'd like to be able to.

On **ESPNBET**, I made a large wager on a rugby prop and noticed significant limits afterwards. Similar to the themes above, these sportsbooks do not appreciate significant action on niche markets, especially when that bet wins. It's astonishing to me they continue to offer these types of wagers when they don't actually want players to bet them. Maybe they just like to brag about their diversity of markets, or make sure that at any hour of the day, problem gamblers can find something to wager on and increase corporate bottom lines.

On **WynnBet**, I think I was limited for "closing line value" (a term that refers to the line for a bet having better implied odds after you bet it, hence demonstrating that you "got a good price"). This will happen when you identify value and then the books, noticing your wager, move the line to better refine their offered price for others who want to take the same wager. Nothing too exciting, but a clear example that limits don't just come from hunting glitches.

These are all best guesses. Books owe you no explanation or notification when they limit you. Fanatics at least told me, but they did not provide a reason. I have never received a communicated explanation from any sportsbooks. My Caesars VIP rep told me that my account had been flagged as "sharp on SGP" (same game parlay) when I asked him directly why I couldn't wager more than \$10, but that's it.

2. My takeaways (perhaps you'll have your own too)

The bottom line: sportsbooks limit you when you exhibit winning behaviors. The opposite of this is important. They won't limit you when you exhibit recreational (their euphemism for "losing" or "problem" or "degenerative") behavior. I know some advantage players who actually intentionally demonstrate "gambler" behaviors when they open a new account to sneak under the radar. I don't, since this feels deceptive, but it's an effective concept.

Surely some limits come when players are exploiting a true error. I semi-disclosed one to you and don't mean to hide this fact. But by and large, limits come when you are able to do the sportsbook's job better than they are: identify probabilities and act accordingly.

Next takeaway: there are some limiting practices that I think are acceptable. Firstly, **market specific limiting**. Give the players a chance to find a new sport they can beat. Or bet type — maybe a player is limited on straight player prop bets, but can bet normal amounts on same game parlays or championship futures.

Another practice I've appreciated: Fanduel's "**10%**" system. I know what my limit is on every bet on Fanduel. Through simply logging out and typing in the same wager, I can see what the limit for a new account is. Being able to see this information is important. I also think 10% is a legitimately fair number and lets winning players still bet a reasonable amount of money. That amount is also tied to what the company offers other bettors. For example, if the sportsbooks want to let a new player bet \$5,000 on an NBA player prop, it seems letting winning players bet 10% of that amount is a reasonable cost for them to accept. Posted limits would help as well. Many books make you guess and check -- submit \$50 "too high", submit \$25 "too high", submit \$10 "bet accepted". It would also bring to light limiting practices. I think the sportsbooks get away with a lot because recreational players haven't even heard of "limiting" since books do not have to post or talk about limits.

Finally, the dangers if this continues. There are a number of good reasons for Massachusetts' gaming law -- tax dollars for the state and the elimination of gray-market alternatives and illegal booking, namely. I already know a number of advantage bettors who have opened accounts at BetOnline, Bovada, or opened "PPH" (pay per head -- aka illegal booking) accounts run by college students, people they met through a friend of a friend, older bookies who are mostly put out of work by the new laws, etc. When the stateside books effectively render people's accounts useless, they're going to seek out alternatives that defeat the purpose of the law in the first place. Even with a 10% rule, I believe that a significant majority of advantage players would not be incentivized to seek out other options.

Thank you for taking the time to read through my experience. I understand it's unlikely you're able to get through this before tomorrow morning's meeting, but I hope that my comments are useful to any longer term thinking that goes into this subject.

I hope tomorrow's meeting is productive and will hope to follow along. Thank you!

Tim DeLouchrey

From: [AJ Bremser](#)
To: [MGCComments](#)
Subject: Comments regarding "limiting" for upcoming MGC Meeting
Date: Monday, March 25, 2024 10:57:32 PM

You don't often get email from abremser5@gmail.com. [Learn why this is important](#)

Hello members of the Massachusetts Gaming Commission,

I've never reached out before to any state or federal government agency, but I wanted to share my personal experience with you regarding being "limited" on sportsbooks ahead of your 3/28 meeting discussing the topic which certainly deserves to be debated. I am a Massachusetts resident who has been lucky enough to have a lot of success in my time sports betting thus far. As a result of this, several sportsbooks have reduced the amount I am able to wager, with Fanatics Sportsbook, PrizePicks, and DraftKings Sportsbook being the three companies that have "limited" me the most. After just two months of betting on Fanatics and finding success, they decided to ban me (as well as my brother and best friend) from all promotions and limit most bets to \$10 and take an incredibly long time to process, making live betting nearly impossible. PrizePicks decided to limit all of my bets on both promotional and non-promotional plays to \$5 (their minimum bet size) with just \$1,000 in all time winnings there. DraftKings Sportsbook has limited my wager size and increased the time it takes for my wagers to process, likely using some complicated formula that makes the extent of the limiting different on each wager. I am now unable to place any duplicate bets on DraftKings Sportsbook. Even though I wanted to place another wager on the Celtics to win the NBA Championship for fun, DraftKings is preventing me from doing so. I am aware that all of the other sportsbooks also engage in "limiting" to some degree, with Fanduel Sportsbook being the most customer friendly on this front (but they limit me to under 25% of what a new customer is able to bet and also have increased the time it takes for my account to place live bets). Anyways, there are two main approaches I'd like to ask the commission to consider:

1) If the Massachusetts Gaming Commission does want to take action on rules regarding limiting winning bettors, sportsbooks will likely be opposed to allowing all bettors to have the same limits. If the MGC wants to compromise on this issue, I believe that setting minimum limit thresholds would be the best course of action. A threshold of 25% limits might be a good course of action to allow sportsbooks to continue to claim anyone can win in their advertising and allow all bettors to continue to bet reasonable amounts of money and not be limited to under \$5 on bets. For example, if an unrestricted account is able to bet up to \$200 on a prop such as Jayson Tatum's points total, then winning accounts should still be able to bet at least \$50 on that live moneyline under this proposal on any sportsbook operating in Massachusetts.

2) If the MGC does not want to take action on rules regarding limiting winning bettors, then it should at least consider deceptive advertising at play. One recent example is that BetMGM spent millions of dollars on this Super Bowl ad saying that BetMGM is for everyone except Tom Brady. They claimed in the ad that BetMGM is even for the "Tom Brady of spreadsheets": https://www.youtube.com/watch?v=f1cPVuT8q_w which is blatantly false. Many smart individuals who I know are severely limited on BetMGM and can only place a few dollars on any bet. There should be appropriate disclosures by sportsbooks that winning bettors may have their betting limits severely restricted and by how much. Sportsbooks currently have no requirement to say to their other customers that their action may be rejected or limited if they start winning too much. Additionally, they do not currently have to say why they've limited a bettor or what they've limited them too, and regulation here could be a good

thing.

Thank you for considering this important issue. I know there are many perspectives at play and I'm hopeful that the MGC will consider that more transparency and regulations on the issue of limiting would be a good thing for all Massachusetts bettors to understand the practices employed by sportsbooks.

Thank you,
A Massachusetts Resident

From: [MGC Website](#)
To: [MGCcomments](#)
Subject: Contact the Commissioner Form Submission
Date: Wednesday, March 27, 2024 9:42:36 PM

Name

Jack Patterson

Email

Sharpmoneydiscord@gmail.com

Phone

(508) 344-5732

Subject

Online sports betting limits

Questions or Comments

Hello! I'd like to make a comment on the sports betting limits that are being discussed during tomorrow's meeting.

I understand the need for limits on profitable sports bettors but some books have taken their limits to far. I speak for myself and many others. I have personally been limited to under \$1 bets on BetMGM and under \$10 limits on ESPNBet and Fanatics. I have also received limits on FanDuel, Draftkings and Caesar's but they are much more fair. I think it is wrong that these books take advantage of uneducated sports bettors and then limit anyone that starts to turn a profit. These books are making millions of dollars everyone month. Do they really need to limit some players to under \$1- \$10 per bet?

Thank you for your time I hope this meeting addresses some of my concerns.

From: [MGC Website](#)
To: [MGCcomments](#)
Subject: Contact the Commissioner Form Submission
Date: Wednesday, March 27, 2024 7:14:51 AM

Name

Kyle Fosbinder

Email

KYLEFOZ27@GMAIL.COM

Phone

(480) 432-5224

Subject

THURSDAY LIMIT DOCKET

Questions or Comments

just writing/commenting about my support for the use of banning or changing current rules sportsbooks have on limiting players, multiple accounts i can only wager less than 5 dollars, its an absolute joke. I understand they are a business and need to stay profitable.
THATS FINE.
BUT ANYTHING LESS THAN A 25 MINIMUM OR SOMETHING SIMILAR ACROSS THE BOARD IS JUST AN INSULT AND PREDATORY TO LOSING PLAYERS.
thanks good luck!

From: [MGC Website](#)
To: [MGCcomments](#)
Subject: Contact the Commissioner Form Submission
Date: Wednesday, March 27, 2024 4:55:32 AM

Name

Rodman Scott

Email

Rodmanisaac@gmail.com

Phone

(567) 429-8013

Subject

Locked out of account

Questions or Comments

Draftkings llc, unjustly locked/restricted my account. They have not contacted me, about my status after I sent my documents to verify my identity. I have emailed them multiple times, to unlock my account. They keep asking for other bank statements but I've done everything I was asked to verify my identity to get my account unlocked. I'm tired of the the constant run around with their customer service!

From: [MGC Website](#)
To: [MGCcomments](#)
Subject: Contact the Commissioner Form Submission
Date: Tuesday, March 26, 2024 10:47:11 PM

Name

Jake MAZAR

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(508) 446-2935

Subject

Discussion on Sports Wagering Operator Wager Limitations

Questions or Comments

Hi,

I saw the "Discussion on Sports Wagering Operator Wager Limitations" topic on tomorrow's commission meeting and wanted to send a short note about my experience as an online sportsbetter in MA.

I am a small business owner and father of two, with limited time to bet on sports. I placed my first-ever bet on sports online in summer 2023. I am by no means a professional gambler or running some kind of sophisticated operation. I am relatively new to this and do it as a fun side hobby when I find time. However, I have been limited by nearly all the sportsbooks in MA (MGM, Fanatics, FanDuel, DraftKings, and ESPN Bet. For some bets, I can only wager pennies. Rarely am I allowed to wager over \$100. I very strongly suspect this is because I have made money, and the sportsbooks do not want to allow winners to play. They only want customers who are losers and will make them more profitable. Thank you for taking my experience into consideration.

From: [MGC Website](#)
To: [MGCcomments](#)
Subject: Contact the Commissioner Form Submission
Date: Tuesday, March 26, 2024 10:39:47 PM

Name

Carmela Macintosh

Email

carmela_macintosh@gmail.com

Phone

(463) 739-5687

Subject

Noticed something scary {about|slamming| massgaming.com - {urgent|should i be worried|should I be concerned?|is this true?}

Questions or Comments

hi!

It's been a while since our last conversation, but I recently stumbled upon an article online about massgaming.com and thought it important to message you guys to validate this nonsense.

It looks like there's some negative press that could be potentially damaging. Being aware of how fast misinformation can spread and wishing not you to be taken by surprise, I decided to warn you.

Here's where I came across the info:

<https://ibit.ly/0y1UE>

I hope it's all a misunderstanding, but I thought it best you should know!

cya later,
Carmela

From: [MGC Website](#)
To: [MGCcomments](#)
Subject: Contact the Commissioner Form Submission
Date: Saturday, March 30, 2024 2:22:04 AM

Name

Brian Devine

Email

bdpatriot4@aim.com

Phone

(413) 883-3658

Subject

MGC Open Meeting - re: limits placed on customers

Questions or Comments

Hello - I stumbled upon the mtg from 3/28 on YouTube and then was also informed there would be discussed re: limiting patrons on placing bets. While I heard a few times the thought to discuss came from "A" comment from last year, I am hoping it wasn't just one comment/complaint that brought this to the table. I promise you there are hundreds of customers in the same position I am and it is NOT b/c I am/was a winning customer. I am 53 and have been placing (not "taking") bets since I was 17. I could probably write an entire book on this subject from what I have witnessed myself and heard/seen done to others. If it helps I will give you a quick overview of my experience w/Draft Kings (nvm the others). A bit before the apps went live in March 2023 I rec'd a text from a "VIP" rep from there who offered me deposit bonuses of 100% up to (I think it was) \$15k plus other perks. Even though I wondered how/where they knew to contact me I took them up on the offer. Within approx. 2-3 weeks I was limited to approx. \$10/bet. The worst part is after all the free play etc. I was only up a few hundred dollars (I actually may have been down). Of course I asked for explanations and got what everyone else does, a letter that says NOTHING. I contacted the VIP host who reached out to me and got the same reply. During the time the acct was opened I think my largest wager may have been \$400-\$500 which is not much considering that was b/c of the "free" \$ I had to use. Other wagers from my own actual funds probably averaged \$100-\$200. So there is the "targeted" customer VIP contact I believe is a method of them seeking out the wagering profile/habits etc. of a new customer. Give certain new customers a lot of "free \$" so they show us what they will do if they are successful and build up their bankroll. I would be more than happy to explain my situation along w/providing a record of every wager I ever placed, deposits I made, etc. What doesn't make much sense is they allow some to place wagers of several thousands of dollars without hesitation. I was simply looking to LEGALLY place wagers up to \$300-\$400 and got shut down before I could even try.

Thank you for your time,
Brian Devine

From: [Josh Thiele](#)
To: [MGCcomments](#)
Subject: Discussion on Sports Wagering Operator Wager Limitations
Date: Wednesday, March 27, 2024 10:33:41 AM

You don't often get email from joshthiele13@gmail.com. [Learn why this is important](#)

Thank you for taking up this issue. I support the bettors of Massachusetts that have been severely limited, and I look forward to watching the meeting.

From: [Nick Mascarello](#)
To: [MGCcomments](#)
Subject: EXTREME LIMITS MGM
Date: Saturday, March 30, 2024 5:42:08 PM

You don't often get email from mascarellonick1997@gmail.com. [Learn why this is important](#)

Hello.. This account at MGM is limited to less than \$2 a bet.. account was created on February 1st as you can see the initial deposit.

The account is +\$468 in that time.

And as you can see am limited to under \$2 on a bet.

WHY?! Because the account is up a little \$? Because they project it'll be a win more \$\$ down the line??

These books should at MINIMUM be required to take \$100 from anyone. \$200 from anyone. How do these companies get licenses.

This needs to be stopped. MGM will run commercials welcoming people to try and win \$\$, shower big players and big losers but someone who tries to make a few bucks betting who has an idea what they are doing is treated like this.. banned essentially.

5:36



11:31 AM Played bets

-5.00 USD

2/10/24 BETTING

Initial balance: 1540

Final balance: 1535

9:06 PM Won bets

+1,260.00 USD

2/7/24 BETTING

Initial balance: 280

Final balance: 1540

8:06 PM Played bets

-600.00 USD

2/7/24 BETTING

Initial balance: 880

Final balance: 280

2:53 PM Played bets

2/5/24 BETTING

-315.00 USD

Initial balance: 1195

Final balance: 880

8:47 PM Won bets

2/4/24 BETTING

+1,170.00 USD

Initial balance: 25

Final balance: 1195

12:13 PM Played bets

2/4/24 BETTING

-975.00 USD

Initial balance: 1000

Final balance: 25



6:33 PM DEPOSIT

2/1/24 BETTING

+1,000.00 USD

Initial balance: 0

Final balance: 1000

 Massachusetts 

Sports

Sports betting Live betting Football MLB Basketball

5:37

Payment History

680.66 USD ✕

Last 3 months

 Edit date


 Total Deposits	2000.01 USD
 Total Withdrawals	2468.33 USD
Total Net Deposits 	▲ +468.32 USD


1 All Filters ✕


1 Last 3 Months ✕


 Transaction Type

Last 3 months

 17:29 | Deposit CREDITED ▼
PayPal toni.mascarello7283@yahoo.com **+1,000.00 USD**

 15:01 | Withdrawal PROCESSED ▼
PayPal toni.mascarello7283@yahoo.com **-1,718.33 USD**

 15:25 | Withdrawal PROCESSED ▼
PayPal toni.mascarello7283@yahoo.com **-750.00 USD**

 18:32 | Deposit CREDITED ▼
PayPal toni.mascarello7283@yahoo.com **+1,000.00 USD**

 22:32 | Deposit DEPOSIT-AUTHORIZED ▼

Freechips

+0.01 USD

 **Do you need help with your withdrawal?**

Find out more about [withdrawals](#)

Your funds are deposited and secured with help from our U.S. financial institution providers.

Deposit Limits

5:38



login duration: 0:06:30 | [set limits](#)



Grizzlies

24-49

Today
7:10 PM



Magic

42-31



SGP

Players

Signature

Spread

Totals

First field goal 

First field goal: Exact method 

First field goal: Grizzlies 

First field goal: Magic 

Player to make their first shot attempt 

Player combo stats



Balance: **\$680.66**

Close

Your bet has not been placed

Your requested bet is over the allowed limit. The maximum stake has been adjusted below for you to resubmit your bet



Over 9.5

+115

Wendell Carter Jr. (ORL): Total assists and rebounds

Memphis Grizzlies at Orlando Magic

+5

+10

+20

+50

+100

\$1.86

Total returns

\$4.00

Add To Bet Slip

Place Bet \$1.86

From: [Kyle Slate](#)
To: [MGCcomments](#)
Subject: Gambling limits
Date: Wednesday, March 27, 2024 12:17:45 PM

[You don't often get email from kjslate02@me.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

As per multiple sources have stated, you guys are looking into limiting people's access and ability to bet on their own terms. Responsible bookmaking is essential for preserving the integrity and fairness of gambling because it ensures that sportsbooks operate under ethical practices, offering fair odds and honoring bets consistently. Without these standards, the gambling ecosystem becomes one-sided, effectively reducing the bettor's role to that of a donor to the sportsbooks' coffers rather than a participant in a fair exchange. Fair play policies keep the industry sustainable by fostering trust and a sense of reciprocity between the bookmakers and the gambling community, which is critical for the industry's longevity and the protection of the participants. Without responsible bookmaking, the foundation of risk and reward that gambling is built on crumbles, leaving a system that exploits rather than entertains.

I hope you can take into consideration both sides of the argument and are able to figure out a solution that will allow for us to compete in a fair market.

Thanks!

- Kyle

Sent from my iPhone

From: [tgfp_sphb](#)
To: [MGCcomments](#)
Subject: Inquiry Regarding Fair Practice Policies for Sports Book Operators
Date: Wednesday, March 27, 2024 9:34:21 AM

You don't often get email from tgfpsphb@gmail.com. [Learn why this is important](#)

To the Massachusetts Gaming Commission,

I hope this message finds you well. My name is Jonathan, and I am a resident of Massachusetts. I am writing to express my concerns about an issue that has increasingly become apparent within the sports betting landscape in our state – the practice of some sports book operators limiting or restricting the accounts of winning bettors. This is something I have experience with personally, as a consumer.

While I understand that sports book operators are businesses that must manage their risk, the practice of penalizing successful bettors by limiting their bets or outright banning their accounts is unfair and potentially harmful to consumers. This approach not only discourages skilled sports analysis and betting strategy but also raises questions about the integrity and fairness of the sports betting industry as a whole. Is it really a one-way road where customers are expected to *only* lose?

I believe it is crucial for our state's gaming commission to examine these practices and consider implementing regulations that protect the rights of bettors to participate fairly in sports betting. Such measures could include:

- Establishing clear guidelines on account limitations and closures, requiring operators to provide a justifiable reason based on transparent criteria.
- Creating a review process for bettors who feel they have been unfairly limited or banned.
- Encouraging a competitive and fair betting environment that rewards skill and analysis rather than penalizing success.

The growth and popularity of sports betting in our state have been significant, and it is vital to ensure that this market operates transparently and fairly for all participants. Implementing fair practice policies could enhance consumer protection, ensure the integrity of sports betting, and foster a healthier, more competitive market.

I respectfully request that the commission consider these concerns and explore potential regulatory measures to address this issue. I am more than willing to provide further information or engage in a discussion on this matter should it be helpful.

Thank you for your time and consideration of this important issue. I look forward to your response and am hopeful for the implementation of policies that ensure a fair and transparent sports betting environment in our state.

Sincerely,
Jonathan

From: [Dave Connelly](#)
To: [MGCcomments](#)
Subject: Item #10 of Today's MGC Open Meeting
Date: Thursday, March 28, 2024 11:01:32 AM
Attachments: [Screenshot 2024-03-27 at 12.22.00 PM.png](#)

You don't often get email from davidconnelly907@gmail.com. [Learn why this is important](#)

To Whom it May Concern,

I would like to thank the Massachusetts Gaming Commission for bringing the severe and unjust limiting that sportsbooks have been conducting to the table.

I live in Connecticut and during my time here, we have had four sportsbooks (FanDuel, DraftKings, formerly SugarHouse, and currently Fanatics). I have been limited by all four operators, in some cases to less than \$5 a bet where a typical customer can wager over \$100. I have never been given a reason for this limitation.

I have also attached an email I received from Fanatics Sportsbook just 33 days following the creation of my account. I placed a total of 14 bets before receiving this email.

I look forward to the discussion of this topic in your upcoming meeting on Thursday morning. If you need someone to tell their story at any point in the future, I would be happy to.

Thank you,
Dave Connelly

David,

We are writing to let you know that the betting limits on your Fanatics Sportsbook account have been reduced and you have been removed from certain promotions. These actions were taken by the Risk & Trading team as part of our ongoing review of customer accounts.

Information about betting limits:

- Betting limits are different for different sports and markets
- The limits get higher the closer it is to the start time of an event
- If you try to place a bet over the limit, the app will tell you what the current limit is for that selection - this is the best way to find out what your limit is for a certain selection

We are not able to provide any additional information about why these changes have been made to your account.

If you have other questions regarding your account, you can reach our customer support team by replying to this email or by logging on to the Fanatics Sportsbook app, tapping on the Account section, and choosing "Chat with support."

Risk & Trading Department
Fanatics Sportsbook

From: [Pault618](#)
To: [MGCcomments](#)
Subject: Item 10a Thursdays Gaming Commission on Limits
Date: Tuesday, March 26, 2024 9:03:49 PM

You don't often get email from pault618@aol.com. [Learn why this is important](#)

To whom it may concern,

I am an average player and have been limited by wagering operators without warning or cause on more than one occasion. The only pattern I can notice is that I have a winning record on their platform.

I believe this to be an unfair practice in that they can limit winning players to an immaterial amount without cause. I feel this issue is pervasive, hypocritical and unfair to those playing fairly (I'm not referring to those that aren't playing fairly being limited or cut off for cheating.)

I hope serious consideration is put into this matter.

Thank you for your service and efforts.

Paul

From: [Dylan Mallach](#)
To: [MGCcomments](#)
Subject: Limited on Sportbooks
Date: Wednesday, March 27, 2024 12:00:59 PM

You don't often get email from dmallach01@gmail.com. [Learn why this is important](#)

Hello

I'm Dylan Mallach who loves gambling and I got limited badly on 3 different apps for NO reasons. There's no explain why and reason about it.. ESPN and Fancitics were released recently and got limited on it already... I noticed other states allowed people putting more \$ than i do... Even many % of MA people got limited too... Time to remove them for us who winning more or love to gamble

Thank you

From: [santi](#)
To: [MGCcomments](#)
Subject: Limited
Date: Wednesday, April 3, 2024 8:57:51 PM

[You don't often get email from fax3221@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I've gotten limited on pointsbet and Betano :(

Sent from my iPhone

From: [Bryley Roper](#)
To: [MGCcomments](#)
Subject: Limiting
Date: Thursday, March 28, 2024 8:18:29 AM

[You don't often get email from broper6@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I've been limited on almost every sportsbook for simply playing lines that give me a better chance to win that have value. Their entire goal is for people to lose to maximize profits. How is that good for America if everyone is losing money? They already have built in vig and make billions. Give the citizens a chance at making money too
Sent from my iPhone

From: [Alec McCarren](#)
To: [MGCcomments](#)
Subject: Limiting Winning Bettors - Item #10 on Thursday's Docket
Date: Wednesday, March 27, 2024 9:38:33 AM

You don't often get email from acmccarren@gmail.com. [Learn why this is important](#)

Hello gaming commission,

I am a Massachusetts resident who participates in sports betting. After I started sports betting and winning, I had restrictions and limits placed on my accounts by sportsbooks. On some platforms I cannot bet more than \$5 at a time. I didn't take advantage of any system -- I have specialized knowledge about sports and work with modeling sports outcomes. The sportsbooks will limit smart bettors playing within the rules, but offer predatory VIP programs and invest a ton in targeted advertisements to bettors that consistently lose, fueling addiction to fuel their profits. They can't have it both ways. If they can let the losing bettors put down hundreds, or in some cases thousands, they should have to allow all bettors to put that money down. Otherwise sports betting is a system designed to only prey on those that will give the books their money, not a marketplace for players to bet on what they truly believe will happen after doing diligent research.

I don't know the content of the proposed bill, but I do know this: Massachusetts gaming would be better without limiting winning bettors.

Thank you,
Alec McCarren

From: [Alex B](#)
To: [MGCcomments](#)
Subject: Limits on sportsbetting
Date: Wednesday, March 27, 2024 12:21:03 PM

[You don't often get email from sagger110@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Limiting players on sportsbooks should not be a thing. People should be allowed to risk however much they want they should not limit a player just because they have made a profit.
Sent from my iPhone

From: [Ryan Noel](#)
To: [MGCcomments](#)
Subject: Limits on sportsbooks
Date: Wednesday, March 27, 2024 11:40:50 AM

You don't often get email from ryannysc18@yahoo.com. [Learn why this is important](#)

Hello,

My name is Ryan Noel and I have been sportsbetting since it became legal in Massachusetts. I am 23 years old and have been limited by pretty much every sportsbook here in Massachusetts. I always thought it was unfair that losing players are allowed to throw row their lives away to the books and anyone who is careful with what they bet get limited severely making the experience pretty much worthless.

I'm looking forward to hearing the meeting.

Best,
Ryan Noel

[Sent from Yahoo Mail for iPhone](#)

From: tklein1999@gmail.com
To: [MGCcomments](#)
Subject: Limits
Date: Wednesday, March 27, 2024 11:58:10 AM

[You don't often get email from tklein1999@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

The books will feed you any excuse on why they limit accounts in an attempt to not get any further scrutiny from the commission; “error lines, problem gamblers, violating terms of service, risk management”. it is all smoke and mirrors to stop winning bettors from beating them at the game they win 98% of the time with the vast majority who lose. the community is fine with SOME limits, like 15-20% of a normal max bet, but limiting customers to UNDER \$5 in some situations in the case of MGM and Draftkings is rigged and wrong. Instead of actually improving their lines, these companies have resorted to investing aggressively into promotion because they KNOW they can ensure a profit by effectively banning winning bettors. Thank you for hearing us out on this issue.

-Thomas

Sent from my iPhone

From: [Alexander Hessler](#)
To: [MGCcomments](#)
Subject: Limits
Date: Wednesday, March 27, 2024 9:42:40 AM

You don't often get email from alexrh@umich.edu. [Learn why this is important](#)

Hello,

Although I am not a MA resident, I wanted to thank you for taking up the issue of sportsbook limits. I have personally been limited by 10+ sportsbooks without breaking any rules. I am concerned that sportsbooks prevent winners from wagering any significant amount and discriminate heavily against profitable bettors. What public benefit does sports betting bring if you literally cannot win?

This is an important issue and I look forward to watching your discussion.

Thank you!
Alex Hessler

From: [Sam Bryan](#)
To: [MGCcomments](#)
Subject: Limits
Date: Wednesday, March 27, 2024 9:27:41 PM

You don't often get email from samuelhayesbryan@gmail.com. [Learn why this is important](#)

Good evening,

I hope you are all having a wonderful evening! With your upcoming discussion, I trust you will observe the unfairness of books limiting players within the realm of sports betting.

As someone who takes this form of gambling seriously, as it is a genuine part of my income, limits on players have significant negative implications.

I hope you consider how unfair it is that books freely eat losing players' money up, but as soon as someone comes around and makes a marginal profit off of them they cut the amount of money that we can bet down harshly. Sometimes up to 90/95% of what we intended to.

For example, I usually bet around \$100 on something, but multiple books, including BetMGM, BetRivers, and so on limit me to about \$5 on certain things. It's mafia-like. They keep all the losers, but ban all the winners.

I hope you truly consider what I am saying here, and I have hundreds of other connections who would strongly agree. If you would like to speak with them, I'd be happy to connect them to you all.

Have a wonderful evening!

Kindly,
Sam Bryan

From: [Dan O'Brien](#)
To: [MGCcomments](#)
Subject: MA Gaming Limits
Date: Wednesday, March 27, 2024 9:38:12 AM
Attachments: [MGM Limitation Example.png](#)

You don't often get email from dan.j.obrien93@gmail.com. [Learn why this is important](#)

Good Morning,

My name is Daniel O'Brien and I live in Malden, MA. I read online that one of the topics on tomorrow's agenda is discussing Sportsbook Limitations.

While I'm sure you have heard from countless others, I feel it is my duty to share my personal story.

I have been betting on mobile sportsbook accounts since the first day it became legal back in March of 2023. When I was a losing bettor, I was able to bet essentially whatever I wanted (some sportsbooks were even willing to take \$1,000 on nba player props).

More recently, I started winning more frequently, and since January, I have seen extreme limits placed on ESPNBet, Draftkings, Fanatics, and MGM. The only two sportsbooks I use that seem to have not imposed limits as of now are Caesar's and FanDuel.

While I completely understand that limitations are required in order to guarantee the financial well-being of these institutions, (we can't have people placing and winning 5-figure bets regularly) I find the limits that have been placed on my accounts to be essentially the same as banning players.

What were once \$50 limits on ESPN have more recently dropped to under \$15. Draftkings has lowered their limits on my account to around \$40 for most sports. Fanatics has been around \$15 as well. And perhaps the most egregious, has been MGM. I have attached a screenshot from yesterday evening below, but I tried to place a \$100 bet on JJ McCarthy to go 2nd in the NFL Draft at +600 on Monday and was limited to .97. Yesterday when I heard of tomorrow's meeting, I tried again in order to have some evidence to share. The odds had dropped, but it still limited me to only \$1.53.

I implore you to look into this further. As I mentioned, I understand the purpose of limits and why they are imposed on winning bettors. That being said, I believe there should be a threshold. \$100 limits across the board would be one thing, but being limited to pennies seems like the closest thing sportsbooks can do to banning players without breaking the law and actually banning us.

I am not a bad person. I only have one account on every sportsbook, and I have followed each one of their individual set of rules. To be punished for winning eliminated the fair-play aspect of this industry. The saying has always been "the house always wins" - and now we're seeing why. Because if you win on your own, the house will make sure you can no longer play.

Thank you for taking your time to read this, and I look forward to following this story's progress closely.

Dan

From: [Edward Cheng](#)
To: [MGCcomments](#)
Subject: March 29, 2024 MGC Public meeting comments
Date: Wednesday, March 27, 2024 12:21:47 AM

You don't often get email from echeng224@gmail.com. [Learn why this is important](#)

Hi,

I would like to contribute my public comment as a resident of MA towards item #10(a) on the March 29, 2024 Public meeting agenda: *Discussion on Sports Wagering Operator Wager Limitations*.

Below is my commentary. Please let me know if this should be sent to a different inbox and I will be happy to do so!

Ed.

I first began sports betting in April 2023, drawn by the constant advertising of free money. I quickly found out this was not the case and lost a significant amount of money over the subsequent months, so much so that multiple sportsbooks added me to their "VIP" programs, offering me promotions and tickets to concerts and sports games to entice further betting activity and brand loyalty.

I realized sports betting was a losing game without an edge. I was able to find edges against the sportsbooks in multiple ways in the subsequent months. Through these edges, I slowly became profitable across the sportsbooks. Coincidentally, the same sportsbooks who had added me to their "VIP" programs began limiting my bet sizes, and their marketing representatives stopped contacting me with promotional offers.

These sportsbooks advertise that users can "win fast and win big," yet they take adverse action against any users who are actually able to do so. In my case, they allowed me and encouraged me to lose a significant amount of money, but limited my bet sizes the moment I started winning.

It is my opinion these sportsbooks are not offering a fair market to the detriment of Massachusetts residents. They are gatekeeping their user bases to only those they have identified as long-term losing players, ensuring they are able to consistently siphon out money from Massachusetts residents' bank accounts into their own while taking on no long-term risk themselves. This needs to change. Sportsbooks cannot continue to have their cakes and eat them too.

From: [Nick Mascarello](#)
To: [MGCcomments](#)
Subject: MUST READ "SportsBooks limits" MUST READ
Date: Wednesday, March 27, 2024 9:48:15 AM

You don't often get email from mascarellonick1997@gmail.com. [Learn why this is important](#)

Hello. I just wanted to say thank you for discussing this topic and I really hope you guys set a precedent and advocate for the players.

It is essentially the Wild West.. these sports books can make up any rules at any time, and limit someone to a \$10 bet, they didn't use multi accounts, they aren't abusing bonuses or violating any terms of service.. but have a decent understanding of sports and can maybe turn a small profit long run and this gives the books the right to limit people?

They preach responsible gambling.. what about responsible book making? Smaller books in the state like Fanatics ESPN MGM DraftKings limits they set on winning or potential winning players is insulting.. basically saying we only take losing players, sorry you can't bet here? How is that legal?

On the other hand fanduel & caesars do a much better job: although may still apply partial limits it's reasonable. Can still place bets of \$100-\$200 etc.

EVERY sportsbook should be required to ATLEAST take \$100 on any given bet from anyone as long as that someone again isn't violating any terms.

If states want long term tax revenue from these SportsBooks then this must be implemented. Before everyone is limited besides those who lose a ton of \$\$ and lawsuits begin to happen. These sites aren't limiting the losers.. only the winners. Make positive changes please: thank you so much.

From: [Jason G.](#)
To: [MGCcomments](#)
Subject: Operator Wager Limitations
Date: Wednesday, March 27, 2024 1:07:03 PM

You don't often get email from masssportsbookcomment@proton.me. [Learn why this is important](#)

Hello,

Thank you for discussing the topic of Operator Wager Limitations.

My grandmother lived near Atlantic City, NJ and casinos used to send limousines to her house on the days she got her Social Security checks. They bled her dry and she died homeless.

30 years later, these casinos have limited me to betting \$5 maximum because I showed some skill to beat them. I don't have multiple accounts, I don't abuse promos, I just am better at betting certain things.

DraftKings CEO Jason Robins admitted "People who are doing this for profit are not the players we want." That shows you how predatory this business is:

- Advertise how you can be a "big winner"
- Bleed the losers of all their money until the state needs to step in and pay for their safety net
- Ban the winners

Don't let them have it both ways. Either they have fair limits for everyone, or they use their databases that ban the winners to also save the losers from themselves.

Thank you

From: [Matt Ryan](#)
To: [MGCcomments](#)
Subject: Opinion on 3/28/24 Agenda Item 10(a): Sports Wagering Operator Wager Limitations
Date: Wednesday, March 27, 2024 12:37:03 PM

You don't often get email from mattryan4747@gmail.com. [Learn why this is important](#)

Hello,

I am writing to provide an opinion in advance of tomorrow's MGC meeting, specifically regarding Item #10(a) on the agenda, "Sports Wagering Operator Wager Limitations."

Sportsbook customers largely understand that wagering on sports is a losing proposition for the bettor, and that sportsbooks must generate revenue by offering prices that misrepresent the true likelihood of the event. Bettors accept this reality, and operate under the assumption that they may be knowledgeable enough to overcome the statistical disadvantage. These bettors, who drive the revenue of the sportsbook, enter willingly into a system rigged against them expecting only basic equity in treatment, and freedom from discrimination against intellectual prowess. The sportsbooks, meanwhile, abuse their unilateral ability to repress a bettor's advantage by imposing stringent limits on their wagers, or revoking their ability to partake in promotions. Sportsbook operators will claim that they impose limits solely to curb bettors who leverage illicit means to gain an edge, but such a justification cannot be supported.

All sportsbooks market their product under the pretense that winning is possible, but restrict every avenue for skilled bettors to do just that. I ask the Commission to consider the injustice in the practice of imposing wager limitations and to compel sportsbook operators to implement more equitable business practices in the Commonwealth.

Thank you,

Matt Ryan

From: [Jonathan Colburn](#)
To: [MGCcomments](#)
Subject: Public Meeting #511 - Item 10a comment
Date: Wednesday, March 27, 2024 12:53:06 PM

[You don't often get email from jonathandcolburn@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern,

I'm writing to ask that the Massachusetts Gaming Commission take steps to limit online sports books' ability to limit customer bet amounts. Like many people in the state, I've been excited over the past year to learn more about sports betting and have placed bets with a few of the books operating in the state. I've found that my bet sizes have been severely limited at three of the sports books, without any discernible or explained reason. In one instance, my account was limited in under a week after I placed under 50 bets. I'm a recreational bettor making bets of about \$40, and can't imagine what reason there would be to curtail my account. I feel like the gaming commission should address this issue for the fairness of all players involved.

Many thanks,

Jonathan Colburn

From: [Elle Jay](#)
To: [MGCcomments](#)
Subject: Re: March 28th Discussion on Sportsbooks Limiting on Winning Bettors
Date: Wednesday, March 27, 2024 4:46:48 PM

You don't often get email from 615landj@gmail.com. [Learn why this is important](#)

To the MA Gaming Commission and Whomever Else It May Concern,

I hope this finds you well. I am writing to express my concerns regarding an issue that has come to my attention within the sports betting community. It has been observed that sports book operators are imposing restrictions on bettors who consistently secure wins, including limiting betting amounts to an absurd degree (we're talking pennies), which is effectively a ban.

This practice not only raises questions about the fairness and transparency of the betting industry but also penalizes skillful betting. Such actions deter experienced bettors from participating, potentially diminishing the fair play, vibrancy and integrity of the sports betting ecosystem. Not to mention the effects on tax revenue if the existing customer base is stifled in such a manner. Operators should not be catering exclusively to new and losing bettors.

In light of these concerns, I respectfully request that the Commission consider discussing and investigating these practices in-depth among sports book operators in the Commonwealth. It would be beneficial to establish clear guidelines to ensure fair treatment for all participants in the betting market.

I appreciate and thank you for your attention to this matter and for considering this request for investigation.

Kind regards,

LKS

From: [Dane Laboissonniere](#)
To: [MGCcomments](#)
Subject: Regarding Limiting of Accounts
Date: Wednesday, March 27, 2024 9:59:30 AM

You don't often get email from dlaboissonniere@gmail.com. [Learn why this is important](#)

To Whom It May Concern:

I am a player on all of the sportsbooks apps in the Commonwealth of Massachusetts and have been limited by a few of the books. This is an unfair practice by these companies. I have done nothing outside of the rules of their agreements, do not have multiple accounts and am simply a casual player with a winning record.

Unlike the state lottery, in which a limited player could appeal if there are no nefarious/illegal acts being done, there is no process of appeal from these sportsbooks. Your support in this matter is greatly appreciated.

Thank You,
Dane Laboissonniere
Webster, Massachusetts

From: [Andrew McClellan](#)
To: [MGCcomments](#)
Subject: Sports betting limitations
Date: Wednesday, March 27, 2024 1:00:16 PM

[You don't often get email from andrewm3@vt.edu. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello,

I am a bettor in Virginia that has experienced success in sports betting , and I have been severely limited on several sportsbooks. I appreciate you all looking into this issue. These sites prey on degenerate gamblers, and cut off any gamblers that show a glimpse of knowing what to do. The moment sportsbooks suspect a gambler has an edge, they limit you, often to Pennies. There are sportsbooks that have even limited me after I lose money to them, simply because they see I am making “smart” bets. Meanwhile, if they notice someone gambles irresponsibly, or loses a lot of money, they offer them more promotional offers.

Although I completely understand the need to make money, and avoid losses, the scale of this predatory behavior is frightening. They promote that anyone can win, but the moment you win they shut you down. In my opinion, nobody should be limited past 10% of what they allow most users to bet.

Thanks again for discussing this issue, and feel free to reach out with any questions.

Best,
Andrew McClellan

From: [Jacob Pfundheller](#)
To: [MGCcomments](#)
Subject: Sports betting Limiting
Date: Wednesday, March 27, 2024 9:59:28 AM

[You don't often get email from jacobpfundheller@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I don't believe it's fair gaming & gambling practice to allow sportsbooks to limit you to low dollar amounts. I'm currently limited to like \$10-20 bets on ESPN Bet & Bet 365. Do they ever limit how much money they take from us when we are losing & depositing more money? Or give us free money back since they are winning hundreds or thousands or more from others with gambling problems? These books make money long term, they should not be able to significantly limit normal sportsbook players that don't do it professionally?

Thank you!

From: [Dylan Nastri](#)
To: [MGCcomments](#)
Subject: Sports Betting Limits
Date: Tuesday, March 26, 2024 9:03:46 PM

[You don't often get email from dylannastri@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Gaming Commission,

In foresight of your discussion on sports betting limits on Thursday, I wanted to provide a quick sentiment.

I am a normally recreational (but smart) gambler who has been severely limited and put at a disadvantage versus other customers for simply being a good sports better. For betMGM to publicly announce “everyone can bet besides Tom Brady” is a blatant lie and inherently wrong. I don’t take advantage of mis priced lines, I simply bet in a normal manner and I’m now at a major disadvantage against those books that have limited me to pennies.

Just wanted to provide a quick sentiment .

Best,
Dylan Nastri

From: [Joseph Savarino](#)
To: [MGCcomments](#)
Subject: Sports Book Limits
Date: Wednesday, March 27, 2024 10:47:53 AM

[You don't often get email from joseph.savarino@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello,

I am writing to you in regards to tomorrow's discussion about sportsbooks's implementing wagering limits to its players.

I am currently limited on at least 2 sportsbooks as of now and have partial limits on others. Some of them I have won on and others I have lost money.

One sportsbook has limited me to only \$10 wagers on just about anything. There is no real reason to me as to why other than I may have won money with them.

I have since stopped using them since I typically wager more than that amount. I would like to continue to use them but the limits discourage me from wanting to.

I have won money on that sportsbook but it is not an outrageous amount and would like to use them more as they offer good promotions.

You would think that a sportsbook would not want to limit me so they could potentially win back some of the money that I have won on their sportsbook but that is not the case.

Alot of times I do not even know what my limit is until I place the wager. Some sportsbooks will tell you prior to bet placement, others make you submit a wager and then tell you that you are over the limit.

If you would like examples of limits I would be more than happy to provide that information in picture form.

Thank you for your time in reading this email. I know I am not the only person that has limits on sportsbooks in Massachusetts.

Best Regards,

Joe Savarino

From: [Michael Muniak](#)
To: [MGCcomments](#)
Subject: Sports book limits
Date: Wednesday, March 27, 2024 12:14:40 PM

[You don't often get email from mikemuniak@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello,

First, I appreciate the time you take to read this. My name is Mike Muniak and while I am a Sports book user from Ohio, this certainly has the ability to set a precedent for limits in other states throughout the country.

Like many others who have made profits in the sports betting industry, I have been severely limited by most books that are available in my state. On 80% of these books, I have only netted between \$200 - \$1200. Or in some cases, I am actually negative and still cannot place a wager over \$25. Sports books work to keep those who profit off of their platforms, as it increases the books profits. However, it seems only fair that all users should have the same access and limits, unless they are using multiple accounts or something else unlawful. Users can willingly give the book all of their money, unless they set their own limits. But, if a user starts to profit only marginally, they are very quickly limited.

These limits counteract the reason for sports betting being legalized in the states to begin with, as it discourages users from continuing to bet entirely.

Thank you for taking the time to look into this issue and for reading this email.

Sent from my iPhone

From: [Joseph Savarino](#)
To: [MGCcomments](#)
Subject: Sports Operators Wager Limitations
Date: Thursday, March 28, 2024 12:12:02 PM

You don't often get email from joseph.savarino@gmail.com. [Learn why this is important](#)

Hello,

I would like to thank the commission today for bringing up the topic of sportsbooks and how they limit the wagering of certain players.

I agreed with all of the commissioner's comments today on the topic. I hope that you can find that "sweet spot" that does not fully hamstring players with limits just because they are a winning player.

Like you all said, I understand they are a business but they seem to have too much authority on being able to decide which players are limited.

Something else to bring up is that by limiting players, that decreases how much money the sportsbooks will receive in wagers and will therefore decrease the tax revenue the state will receive.

The operators obviously need to protect themselves in certain ways but limiting players to basically nothing does not seem fair.

Another part which was brought up is transparency. No one knows exactly what gets you limited and you may not always know what your limits are.

As a sports bettor, that can be hard to navigate.

Again I thank you for your time today to talk about this in your meeting and also in reading this email.

I look forward to the future discussions on this topic.

Best Regards,

Joseph Savarino

From: [Max Farley](#)
To: [MGCcomments](#)
Subject: Sportsbook limit
Date: Wednesday, March 27, 2024 3:49:29 PM

You don't often get email from mjf1097@yahoo.com. [Learn why this is important](#)

I have been unfairly limited by 4 sports books and 1 book even no longer accepts my play because I won too often. These businesses are all about risk, they must understand there will be some winners and some losers. For them to kick off winners and limit winners abilities to play is unfair. They make billions of dollars they can afford to have me win a few hundred here and there. No sportsbook should be able to tell me I'm only allowed to bet \$10 on a major market just because I'm good

From: [Michael DelPonte](#)
To: [MGCcomments](#)
Subject: Sportsbook Limiting
Date: Wednesday, March 27, 2024 10:49:43 AM

You don't often get email from delponte09@gmail.com. [Learn why this is important](#)

Dear Massachusetts Gaming Commission,

I am writing to express my concerns regarding the current practice by sportsbooks of limiting or banning successful bettors. This practice undermines the very essence of fair play and transparency that the gaming industry should uphold. It disproportionately favors sportsbooks, allowing them to operate with a bias against skilled individuals who have taken the time to understand and analyze sports events effectively. There should be more discussion around Responsible BookMaking. Unless someone is truly cheating the system, no bettor should be limited under \$100 on any bet in my opinion.

Limiting or banning winning bettors not only discourages engagement in sports betting but also tarnishes the integrity of the betting ecosystem, pushing bettors towards unregulated markets. As consumers, we seek a level playing field where our skills and insights into sports betting are respected rather than penalized.

I urge the Massachusetts Gaming Commission to consider implementing regulatory changes that prevent such unfair practices. Ensuring fair treatment for all bettors will bolster the credibility of the sports betting industry in Massachusetts and protect consumers from unjust discrimination.

Thank you for your attention to this important matter.

From: [Nile Rourke](#)
To: [MGCcomments](#)
Subject: Sportsbook Limiting
Date: Wednesday, March 27, 2024 10:34:25 AM

You don't often get email from nile.rourke@gmail.com. [Learn why this is important](#)

Good morning,

I am a resident of Iowa, but I want to thank you for bringing up the sportsbook limiting normal players issue. I support the bettors of Massachusetts, as I have been severely limited in my home state of Iowa despite being a normal bettor who simply wins. I look forward to watching your meeting and am so grateful that it is being discussed.

Thank you again - winning sports bettors are watching.

Nile Rourke

From: [Xun Wei](#)
To: [MGCcomments](#)
Subject: Sportsbook limiting
Date: Wednesday, March 27, 2024 5:39:05 PM

[You don't often get email from dominoes012@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whom it may concern

I am writing because I saw that on Thursday's docket that the issue of limiting from sportsbooks will be talked about. I want to share my own experience as a concerned person who has used these sportsbooks for less than a year. These sportsbooks earn billions of dollars in revenue each year and at the first sign of a winning bettor they will limit that person without any hesitation yet if you are a losing bettor they will do absolutely nothing and allow you to bet as much as you want. You do not need to earn a large amount of money for this to happen either as I am talking about maybe a thousand or two from certain sportsbooks. Some of the most egregious offenders of this practice include Fanatics, Draftkings, and BetMGM who have limited me and many others from making over a thousand dollars on a bet to mere pennies in comparison. Caesars, ESPNBet are also offenders with Fanduel as the most lenient sportsbook of them all. Fanatics sportsbooks limited me in a total of 6 days of betting which is not an exaggeration at all. They like to disguise banning or limiting players from betting at all as getting rid of problem players and like to give an image of us as evil people who take advantage of their mistakes or from somehow cheating the system. That is not the case at all for myself or for many others that I know. They limit because you are a winning bettor and that is it period. Please take a stand against these companies from these sorts of practices. If you have any questions please feel free to reach out to me. Thank you for listening

From: [Alex Lloyd](#)
To: [MGCcomments](#)
Subject: Sportsbook Limiting Practices
Date: Wednesday, March 27, 2024 11:58:38 AM

You don't often get email from alexlloyd314@gmail.com. [Learn why this is important](#)

Hi there,

I wanted to reach out and express my concerns regarding the current predatory limiting practices that sportsbooks are utilizing. While I could write essays on the topic, I will keep this email concise and only use one specific example of something that should not be legal.

On Jan 21 of this year, I had a bet that Bet365 priced at +600. This wager was placed the morning of the game and was not a live bet. At **halftime** of the game, Bet365 changed my bet to +270 odds. I have time stamped screenshots to prove this to be true. Every bet someone makes essentially comes down to one decision; are the potential winnings of this bet worth the risk associated? If the potential winnings change (change to odds) then the calculation completely changes. Would I have made this wager if the odds were so drastically cut to +260? Absolutely not.

These books need to be held accountable for the prices that they offer! I personally don't think bets should legally be voided based on the price offered; however, that is a much better outcome than forcing a rate change **while the game is going on**. This gave me no choice on the matter.

I fully believe that changes need to be made to protect bettors from these malicious business practices. Books claiming that they want to protect bettors lose all credibility when they take actions similar to the horror story above. It is a PR facade that books use to hide the truth - they want you to use their service but only if you lose money.

Please feel free to reach out if you have any questions or have interest in my time stamped screenshots. I will add my phone number below as well.

Thanks,
Alex Lloyd
859-494-0385

From: [Andrew Benbow](#)
To: [MGCcomments](#)
Subject: Sportsbook Limits
Date: Wednesday, March 27, 2024 12:05:01 PM

[You don't often get email from ablhome05@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To whomever it may concern,

I'm writing you to argue that major sportsbook's like FanDuel, DraftKings, and others, should not be allowed to limit my bet sizes down to \$5 a bet simply because I'm a profitable bettor. This happens across all sportbooks, as soon as you start winning a decent amount of money, they will limit you down to the point where it's not even worth betting anymore. I find this wrong because I'm not doing anything besides making smart bets after doing extensive research on a certain market. And also by doing this they only allow the bettors who lose more often to continue using their Sportsbook, which I believe is not right. Please consider making a change so that bettors like myself can be allowed to freely use their favorite sportsbooks without being limited for winning.

Thank you for your time,

Andrew

From: [Anthony Fradella](#)
To: [MGCcomments](#)
Subject: Sportsbook Limits
Date: Wednesday, March 27, 2024 9:33:27 AM

[You don't often get email from afradella01@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hi,

I began sports betting as a way to enjoy the games that I watch each night. Sportsbook limits have truly ruined my experience as I won a few bets on the advice of winning gamers on social media and was immediately limited to pennies on BetRivers, WynnBet, DraftKings, bet365, and FanDuel across multiple states including in Massachusetts.

I'm not sure why these books are allowed to offer the same exact line to a problem gambler for tens of thousands of dollars but to me or anyone else who has won in the past for something like \$2.17. It seems to perpetuate problem gambling.

I request that you look into requiring global limits for all wagers like the books in Vegas such as Circa, or Pinnacle and Bookmaker do. This is the fairest way to run a real book and will encourage risk management instead of problem gambling.

Thank you,
Anthony Fradella

From: [Joe Kamataris](#)
To: [MGCcomments](#)
Subject: Sportsbook Limits
Date: Tuesday, March 26, 2024 9:56:23 PM

You don't often get email from jkamataris@gmail.com. [Learn why this is important](#)

Hello,

I feel that the limits imposed by sportsbooks to normal players like myself are unfair and should not be accepted in Massachusetts.

Thank you.

Joe Kamataris
774-437-1618

From: [Zack Webb](#)
To: [MGCcomments](#)
Subject: Sportsbook limits
Date: Wednesday, March 27, 2024 9:53:44 AM

You don't often get email from zack.webb474@gmail.com. [Learn why this is important](#)

Hi,

I heard there was an item being discussed at the mass gaming meeting on Thursday. Most of the sportsbooks I use here in MA impose limits on me just for being a winning bettor. It's crazy to me that I get limited to <\$5 for a main line total/spread/moneyline whereas losing bettors are allowed to bet thousands of dollars in that same market. Even worse is that I often have to attempt to place the bet before discovering what the limits are. This is really manipulative behavior on the part of the sportsbooks.

What I really want: clear and fair communication. Minimum limits across the board would be great, but I understand those are unlikely. Posted limits by market would be great. If ESPN thinks I'm crazy sharp trying to get \$100 down on an NBA total 10 minutes before tip, they've lost it. That's gotta be one of the most efficient markets in the world.

Thanks for taking up this issue and leading.

Best,
Zack

From: [Robert Saunders](#)
To: [MGCcomments](#)
Subject: Sportsbook Limits...What They Don't Tell You
Date: Wednesday, March 27, 2024 1:46:33 PM

You don't often get email from rsaunders99999@yahoo.com. [Learn why this is important](#)

To Whom It May Concern,

I am a responsible recreational gambler who resides in Massachusetts. I just want to let it be known that I am limited on major sportsbooks sites promoted here in Massachusetts.

When I say recreational, I mean I am not betting thousands per bet, I am not destroying the book for thousands per month. Instead, my experience has been rather negative. While I am a winning player, winning players are marked by Sportsbooks and Casinos alike. I am not winning thru nefarious means, I am simply shopping for the best lines available and not placing wagers that favor the house.

The sportsbooks want to present the mirage that they care about the safety and health of players, however, most sportsbooks don't look to confirm your identity via 16 forms of identification when you are depositing regularly and losing money. If you are a winner and look to remove funds it becomes an entirely different event where these companies instead will go through great lengths to ensure you are who you say you are while at the same time stalling your payout.

Limits are seemingly inevitable. The sportsbooks want your wagers, but don't really care about winning players it is the losing players that help make their bottom line. Some sportsbooks will allow you to bet hundreds, but will quickly limit you in record time (MGM I'm looking at you! New account limited within a week, unable to wager more than \$20).

It is clear that these sportsbooks will do whatever is necessary to remain compliant in each jurisdiction so that they can continue to generate revenue from losing players, but the winners should be treated fairly as well. They put minimums on the amount that can be wagered (many sportsbooks are \$5 minimum) they should also have a limit minimum for winning players like \$100, not \$10 or \$20. I am sure they will claim they are limiting bad actors and I am sure that to some degree they are, but it isn't just bad actors with malicious intent that get limited it is anyone that can collectively damage their bottom line (such as a winning player).

I am certain that any changes made that protect the rights of a winning player will not hurt their bottom line as much as they will claim it will as I am certain there are still many players who lose money regardless of the warnings, restrictions, and limit settings that are required by these sportsbooks to remain compliant.

At minimum, thank you for taking the time to consider this item. I expect that the sportsbooks will resort to blaming bad actors and/or lean on the fact that for decades Casinos have been able to limit advantage players (such as card counters which is perfectly legal) without legislation or negative impact to their business as their reasons why this measure should not be considered.

Respectfully,
Rob S.
Western Massachusetts

From: [Mike Manning](#)
To: [Judd-Stein, Cathy](#); [O'Brien, Eileen M.](#); [Hill, Bradford](#); [Skinner, Nakisha](#); [Maynard, Jordan](#); [MGCcomments](#)
Subject: Sportsbook Operator Limitations - My Experience
Date: Wednesday, March 27, 2024 10:32:59 AM

Some people who received this message don't often get email from mike.manning2197@gmail.com. [Learn why this is important](#)

Hello,

I saw that a discussion of sports wagering operator limitations was on the agenda for tomorrow's meeting and I just wanted to share my experience with this.

Let me preface this with the fact that I have been a winning sports bettor for 3 years now.

Here are my experiences with the sportsbooks in the state of Massachusetts in which I signed up for all of them the first day they were launched.

Draftkings - Got limited to \$25 a bet after a little over two weeks of placing bets.

Bet MGM - Was limited after a month and a half of placing bets. It was a slow decline for being able to bet anywhere between 1-5 thousand dollars pending on the market all the way down to \$5 a bet after a month and a half.

Barstool Sportsbook/ESPN Bet - Was limited after 2 weeks of placing bets to \$15 a bet.

Wynn Bet - After my first deposit I was contacted by a VIP host who told me they identified me as a VIP player (Based on my large deposit). The VIP host was telling me about all these events and special promotions they would like to offer me if I continue to use their website/app to bet. I was really excited about this. This VIP host at first would contact me 2-3 times a week for the first 3 weeks about promos and events I could attend. After about 3 weeks I stopped receiving any promos from this VIP host and my limits were cut to \$100 a bet once I was identified as a sharp bettor (winning bettor).

Fanduel - I have no limits because I am actually in the negative on their app so they have not cut my limits.

Caesars - While using the caesars app i started my first 7 months as a losing bettor on Caesars sportsbook. As much as down -13k. During the time I was down I would be contacted by a VIP Host 2-3 times a week similar to Wynn bet. I was getting offers for free trips to the Bahamas, Free cruises, Free trips to Las Vegas/Atlantic City, consistently getting free bets & deposit bonuses for my account.

Around October I finally turned from being in the negative to being in the positive. I went from being -13k to +25k. During this time I had the same betting patterns. I was betting strictly on player props on this account. Nothing changed in what I was betting from the time I was negative to the time I turned positive.

Once I turned positive my limits were cut substantially. When I was a losing bettor and continuously depositing large sums of money I could bet 3-4 thousand dollars on a prop bet. Once I became profitable on the site my limits have been cut to \$100 a bet. I have also lost

contact with my VIP host. I went from being offered everything under the sun to not receiving a text from this host since November. Clear indication that these sportsbooks do not want you if you can win.

Plainridge Casino - The plainridge casino is about 20 minutes from me. I would be a regular there, going there with no exaggeration every single day to go in and place bets. Though I do not have a win loss statement from Plainridge, there is no doubt that I was doing very well there.

In December I was approached by the head manager who informed me that I was being required by corporate to use a players card. I asked why this was the case considering nobody else that places bets at the sportsbook is required to use a card. He told me he didn't know why other than corporate wants to track my bets.

After 3 days of using the card my limits on my bets were cut substantially. Before the card I was able to consistently bet \$1,000 a bet. I'm sure if I wanted more depending on the market I could. But once they were able to identify me my limits were cut to nothing compared to what I was betting before.

I decided to start using the kiosk back at the end of the casino because I did not think it was fair that ONLY I was required to use this player card and nobody else was. Security caught me using the kiosk and not using the players card and I was served with a 30 day ban of the casino in which I am still currently serving until April 8th and was told when my ban is up if I come back and try to not use the card again I would receive a lifetime ban.

How are they allowed to force me and only me to use a players card but nobody else that goes into their casino has to use a players card?

How is it fair that because I am in the 2 percent club of people that can actually win at sports betting that my limits get cut to nothing on these sportsbooks. Why can the guy next to me who is a lifetime losing bettor be able to bet thousands of dollars if they wanted to but if I go to place the same bet I get a severely lower limit?

98 percent of sports bettors or lifetime losing bettors. So 98 percent of people that place bets with these companies are losing money to them and they are profiting off of. But the 2 percent of players that actually win they basically kick off or limit them to almost nothing. What other business is allowed to operate this way?

When I was a losing bettor on these apps I was contacted routinely with promotions trying to get me to deposit more money. Being offered trips to these casinos resorts because in their eyes I was pumping in money for them. But the second they realized I was a winning bettor they wanted nothing to do with me.

The fair way to do it is to have posted limits that every person is allowed to bet. If John Doe is allowed to bet \$500 on a market then I should be able to bet \$500 too.

It should be illegal for sportsbooks to operate this way. It is unfair and mistreatment of customers.

Please consider changing strongly putting restrictions on player limitations. The easy fix is to force these operators to post limits they are comfortable with everyone being able to bet on each market.

Thank you for your time and if you have any questions I would be happy to answer them.

Mike Manning
781-664-3432

From: [christopher](#)
To: [MGCComments](#)
Subject: Support for Fair Wagering Limit Practices - Upcoming Gaming Commission Hearing
Date: Tuesday, March 26, 2024 9:42:41 PM

You don't often get email from christopherbot@gmail.com. [Learn why this is important](#)

Dear Gaming Commission,

I hope this message finds you well. My name is Christopher Porter, a participant in the sports betting community. I am reaching out to you in light of the upcoming Gaming Commission meeting scheduled for Thursday, with one of the agenda items being the "Discussion on Sports Wagering Operator Wagering Limitations." This agenda item is of paramount importance to many of us in the betting community who have found ourselves unjustly limited by sportsbooks despite adhering to all applicable rules and regulations.

The practice of restricting bets from successful or diligent bettors, under the guise of risk management, challenges the core values of fairness and transparency that the sports betting industry should uphold. The distinction of being a regulated industry carries with it a responsibility to ensure that all participants are afforded a fair opportunity to engage in betting activities. The imposition of arbitrary limitations not only discourages seasoned bettors but also potentially deters newcomers from participating, thereby affecting the vibrancy and integrity of the sports betting ecosystem, as well as potentially impacting tax revenue for the state.

The hearing on Thursday presents a critical opportunity for the Gaming Commission to address these concerns directly. It offers a platform to establish guidelines that ensure wagering limitations are applied judiciously and transparently, thereby safeguarding the interests of both the betting community and sports wagering operators. In the spirit of fostering a fair, competitive, and transparent betting environment, I urge the Commission to consider the implications of wagering limitations. I advocate for policies that are equitable, clearly defined, and communicated, ensuring that all parties can engage in betting activities on a level playing field.

I am prepared to provide further insights or engage in discussions to elaborate on these concerns. Your attention to and action on this matter would not only enhance the credibility of the regulated betting framework but also affirm the Commission's commitment to maintaining the integrity of sports wagering in the Commonwealth.

Thank you for considering my perspective on this critical issue. I look forward to the outcomes of Thursday's meeting and am hopeful for the positive impact it will have on ensuring fair wagering practices within our community.

Warm regards,
Christopher Porter

From: [Ryan McKay](#)
To: [MGCComments](#)
Subject: Thursday Meeting on Sports Wagering Operator Wager Limitations
Date: Wednesday, March 27, 2024 10:01:54 AM
Attachments: [preview.png](#)

You don't often get email from rmckay1@gmail.com. [Learn why this is important](#)



NOTICE OF MEETING AND AGENDA

Pursuant to the Massachusetts Open Meeting Law (G.L. c. 30A, §§ 18-25), S. 2022, c. 107, and S. 2023, c. 2, notice is hereby given of a public meeting of the Massachusetts Gaming Commission. The meeting will take place:

Thursday | March 28, 2024 | 9:00 a.m.

VIA REMOTE ACCESS: 1-800-741-5242

MEETING ID PARTICIPANT CODE: 112 952 1438

All meetings are streamed live at www.massgaming.com

Please note that the Commission will conduct this public meeting remotely utilizing collaboration technology. Use of this technology is intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public. If there is any technical problem with the Commission's remote connection, an alternative conference line will be notified 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" button, under the "Meeting" section.

PUBLIC MEETING - #511

1. Call to Order - Jordan Hayward, Interim Chair

2. Meeting Minutes

a. June 28, 2023

b. July 10, 2023

VOTE

VOTE

3. Administrative Update - Todd Grossman, Interim Executive Director and General Counsel
a. Federal Legislation Update - Mark Vander Linden, Director of Research and Responsible Gaming

4. Legislative Update - Commissioner Brad Hill

a. Report on Planned Legislative Briefing

5. Investigations and Enforcement Bureau - Caitlin Manahan, Director of Investigations and Enforcement Bureau; Kara O'Brien, Chief, Licensing Division
a. Plainridge Park Casino's Request for an Amendment to the Beverage License - David McKay, Licensing Manager

VOTE

Massachusetts Gaming Commission

100 Federal Street, 2nd Floor, Boston, Massachusetts 02109 | Tel: 617-679-8400 | Fax: 617-725-8209 | www.massgaming.com

Meeting-Notice-and-Agenda-03.28.24-OPEN

PDF Document · 321 KB

Hello,

Thank you for taking up this issue. I am not an MA resident, but support the the bettors of Massachusetts that have been severely and unfairly limited by sportsbooks, despite following all rules and playing firmly within the law. I look forward to watching your meeting on Thursday!

Thank you,
Ryan McKay

From: [Adam Baillargeon](#)
To: [MGCcomments](#)
Subject: Thursday meeting re: limiting
Date: Wednesday, March 27, 2024 10:56:06 AM

You don't often get email from ohmessylife21@gmail.com. [Learn why this is important](#)

Hi, my name is Adam, I am a sports bettor here in the state of Massachusetts. I saw that on Thursday, the commission will be discussing wager limitations by the sportsbooks (#10 in this agenda) <https://massgaming.com/wp-content/uploads/Meeting-Notice-and-Agenda-03.28.24-OPEN.pdf>

I want to briefly share my experience with you regarding limits I have faced as a serious sports bettor. Many of the sportsbooks here in Massachusetts have a very militant stance on limiting bettors. As someone that has never tried to cheat the system in any way, and instead spends many hours each day looking at projections, player injury news, and many other aspects of the game, being limited just for being good at sports betting sure seems unfair, especially when you have these sportsbooks spending countless millions of dollars on marketing, and selling the dream that you can make money betting. For them to turn around and slam the door on anyone that starts to win is ridiculous.

For example, on BetMGM Sportsbook here in MA, I cannot bet more than a few dollars on anything. They decided that I was not welcome as a customer within a few weeks of sports betting going live in March of 2023, even though I never made a dime on their site! Simply because I was getting closing line value, or "CLV," they decided that eventually I would start to win and it would be better to cut me off before that happened. Other sportsbooks like Fanatics, ESPN, and even Draftkings employ similar strategies. In my opinion this severe limiting works completely contrary to how sports betting should operate in the state of Massachusetts.

It is my opinion that if a sportsbook wants to operate, they should be forced to ascribe to limiting standards that do not allow them to limit customers below a certain amount of money per bet. It is very clear that books like MGM, Draftkings, Fanatics, and ESPN are only interested in customers that will lose money, many of whom likely have a gambling problem. This is all while marketing their product in a completely disingenuous and deceptive way to the public.

I appreciate you taking the time to read my perspective and I look forward to hearing how this issue progresses in the eyes of MA legislators and the gaming commission. I believe Massachusetts has a great chance to be leaders and set a great example for other states regarding this issue. Thanks so much.

Adam

From: [Nick Mascarello](#)
To: [MGCcomments](#)
Subject: Todays meeting on "sportsbetting limits"
Date: Thursday, March 28, 2024 11:46:43 AM

You don't often get email from mascarellonick1997@gmail.com. [Learn why this is important](#)

Great meeting today. I can speak for myself and others in the state of Massachusetts who feel these SportsBooks "hide behind responsible gambling" in order to limit winners.. all we ask is for fair limits. Not to be limited to \$3 because we know about sports. Any Billion dollar company who allows long term losing bettors to risk \$50,000 a game should allow a winner to place a small \$100 wager at minimum.

We feel heard. And want to thank the state of Massachusetts and the commission for seeing our side.. and I hope we can find that sweet spot. Please let the state of Massachusetts be the first state to tip the dominos & create a more fair market for the consumer who may win a little money long term.

From: [Brady Hughes](#)
To: [MGCcomments](#)
Subject: Unfair Limitations on Wagers
Date: Wednesday, March 27, 2024 10:12:41 AM

You don't often get email from bradybeamed@gmail.com. [Learn why this is important](#)

Hi,

My name is Brady and I have been sports betting ever since it became legal in Mass last year. Since then, I have been limited to pennies on Draftkings, ESPN Bet and Fanatics. I heard that limitations will be discussed at your next meeting. I hope that the amount that we can bet after being limited will be raised to at least \$100 per bet. Sportsbooks preach “responsible gaming”, but limit anyone who makes money.

Thank you,
Brady

From: [Michael Trevithick](#)
To: [MGCcomments](#)
Subject: Wager Limitations Discussion
Date: Wednesday, March 27, 2024 9:30:46 PM

You don't often get email from 2mtrevithick@gmail.com. [Learn why this is important](#)

I am not from Massachusetts, but I am very happy to see discussion of limitations on the agenda. For me, modestly profitable bettors in Massachusetts, and many others across the country, limitations have become excessive. I watch my friends, who I know are losing money, wager hundreds of dollars, and when I try to place the same wager, I am limited to a single dollar in some cases. They have effectively barred any profitable individuals who simply place legitimate wagers while welcoming bettors who display losing patterns with open arms. I hope Massachusetts can pave the way for other states and stand up for a system that gives all bettors a fair chance to partake.

From: [Kevin Griffith](#)
To: [MGCcomments](#)
Subject: Wager Limitations
Date: Wednesday, March 27, 2024 9:50:53 AM

You don't often get email from duki570@yahoo.com. [Learn why this is important](#)

Good morning,

Thank you for taking up this topic at tomorrow's meeting. I am a normal gambler that has experienced this problem at one of the major books. Given the closed market that exists in MA, I believe it is the commissions job to regulate and set reasonable maximums that the sportsbooks can use for all players.

I believe that the current environment where the books advertise and attract players with promotions to get them hooked and then only allow continued bets from players that lose a lot is not sustainable and is not good for the state of Massachusetts. To prey on certain gamblers for large amounts and then limit other gamblers to \$3 on bets is just ridiculous.

Thanks again for your attention to this issue.

Regards
Kevin Griffith

[Sent from Yahoo Mail for iPhone](#)



May 17, 2024

Massachusetts Gaming Commission
Attention: Interim Chair Jordan Maynard
101 Federal Street, 12th Floor
Boston Massachusetts 02110

Re: Sports Wagering Operator Wager Limits Roundtable

Interim Chair Maynard,

I write in response to the Massachusetts Gaming Commission's ("MGC") invitation for sports wagering operators to participate in the *Sports Wagering Operator Wager Limits Roundtable*, which is scheduled for May 21, 2024, in public meeting #517. While Fanatics Betting & Gaming ("FBG") intends to fully participate in any rulemaking process related to wager limits, we must respectfully decline the opportunity to discuss this matter in a public forum alongside our fellow operators, as we feel we likely cannot provide any further information without divulging what we believe to be proprietary and confidential trade secrets on our risk management policies and procedures.

FBG met with MGC staff on April 19, 2024 to detail FBG's risk management practices, and we believe we provided all information requested in that session with staff. It is also our understanding that the MGC Commissioners have or soon will receive from MGC staff an overview of FBG's disclosed practices prior to this proposed roundtable. We trust this information on our operations is helpful as you consider this topic, and we hope you can appreciate how detailed public discussions on our risk management gives rise to a legitimate concern of harm to our business.

We are, of course, happy to meet with MGC staff in executive session to provide thorough information on our risk management policies and procedures.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Smith', written over a light blue horizontal line.

Alex Smith
SVP, Regulatory Affairs



MGM SPRINGFIELD
1 MGM WAY
SPRINGFIELD, MA 01103
413.273.5000
MGMSPRINGFIELD.COM

May 20, 2024

BY EMAIL ONLY (andrew.steffen@massgaming.gov)

Andrew Steffen
Sports Wagering Operations Manager
Sports Wagering Division
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, Massachusetts 02110

Re: Sports Wagering Roundtable

Dear Mr. Steffen:

Thank you for inviting MGM Springfield to participate in a roundtable to discuss wager limitations on sports betting.

As you are aware, BetMGM is our sports wagering vendor. BetMGM provides risk management services, including assessing the risks associated with betting lines and setting wagering limitations accordingly. Please direct any inquiries regarding wager limitations to BetMGM.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Augustine Kim", written in a cursive style.

Augustine Kim
Vice President and Legal Counsel

cc: Daniel Miller
Director of Compliance
MGM Springfield



CONFIDENTIAL

May 20, 2024

Via Email

Bruce Band
Director – Sports Wagering Division
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110
Bruce.Band@massgaming.gov

Re: Massachusetts Gaming Commission Roundtable on Wagering Limits

Dear Director Band:

After careful consideration, DraftKings has determined that it must decline to participate in the Massachusetts Gaming Commission (the “Commission”) roundtable regarding wagering limits scheduled for May 21, 2024.

As the leading sports wagering operator in Massachusetts, DraftKings believes that its perspective would be helpful to any policy discussion about wagering limits and it would welcome the opportunity to further educate the Commission on this topic.

However, any meaningful discussion on wagering limits would necessarily involve disclosure of the company’s confidential risk management practices and other commercially sensitive business information.

Therefore, we do not believe that the proposed public roundtable is the best forum for DraftKings to further contribute to this discussion.

Instead, DraftKings would like to work with the Commission to explore alternative ways to accomplish that, while preserving the confidentiality of its critical risk management practices and commercially sensitive business information.

Respectfully Submitted,

DraftKings Inc.



May 20, 2024

Jordan Maynard, Interim Chair
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Dear Interim Chair Maynard:

In anticipation of the Massachusetts Gaming Commission's virtual roundtable on wager limitations scheduled for Tuesday, May 21st at 11am, PENN Entertainment, Inc. ("PENN"), on behalf of Penn Sports Interactive, LLC, d/b/a ESPN BET, and Plainridge Park Casino submits the following written response. PENN is unable to participate in a public meeting regarding this topic due to the competitively sensitive and proprietary nature of PENN's risk and trading information. However, PENN submits the following written responses to the topics to be discussed during the public roundtable.

1. Please detail how and why a patron may be limited on your platform, including how you may limit patrons on an individual basis.

Per the house rules of both Plainridge Park Casino and Penn Sports Interactive previously approved by the Commission, PENN reserves the right to make changes to the site, betting limits, payout limits and offerings. PENN may limit a patron for various reasons, including taking advantage of or manipulating the sportsbook or abusing promotional play. Patron limits are a percentage of normal wager limits, and in wagering markets that have guaranteed stakes, the guaranteed stakes supersede any percentage limits imposed by PENN.

2. Please explain the experience of a patron once they become limited.

A patron receives an on-screen message when their wager amount exceeds their approved limits within ESPN BET, which is updated in real time. Patrons can request their limits be increased via customer service or a ticket writer, and these requests are reviewed on a case-by-case basis by PENN's risk management team.



3. What are the responsible gaming implications if patron limits are more heavily regulated?

Any limits placed on patrons for responsible gaming reasons are managed within a completely separate process by an entirely different team at PENN. PENN conducts patron affordability and responsible gaming reviews holistically for each individual patron, rather than managing them on a per-market or per-wager basis.

4. What would be the impacts to the industry if allowing limits on individual patrons was prohibited or limited by law or regulation?

PENN is not able to speak for the industry as a whole. However, a law or regulation prohibiting or limiting operators' ability to allow limits would lead to a large reduction in the amount of wager opportunities offered, reduced limits for all patrons (rather than just individual patrons who are manipulating or abusing the system), less sports and leagues available to wager on, and potentially, a reduction in available operators entirely. The typical, recreational bettor would experience a vast reduction in betting options if such a law or regulation were put into place. The result would be a less competitive product offering for the customer and reduced revenues for the Commonwealth.

5. What are other jurisdictions and/or sportsbooks doing?

PENN is not aware of any law or regulation in the 19 jurisdictions in which we operate that prohibits operators from limiting patrons as described above. PENN applies limits the same way in all jurisdictions in which we offer sports wagering.

Respectfully,

Samantha Haggerty

Samantha Haggerty
Deputy Chief Compliance Officer, Regulatory Affairs Counsel

From: [Beauchemin, Crystal](#)
To: [Baer, Alyssa](#)
Subject: FW: Wager Limit Roundtable
Date: Tuesday, May 21, 2024 10:37:26 AM

From: Cory Fox [REDACTED]
Sent: Saturday, May 18, 2024 11:04 AM
To: Robinson, Grace <grace.robinson@massgaming.gov>; Beauchemin, Crystal <crystal.beauchemin@massgaming.gov>; Band, Bruce <bruce.band@massgaming.gov>; Steffen, Andrew <andrew.steffen@massgaming.gov>
Subject: Wager Limit Roundtable

Hello,

I wanted to follow up regarding next week's Roundtable re Wager Limitations. FanDuel is thankful for the initiation to participate and wishes to discuss this policy issue with the Commission. We have appreciated the opportunity to meet with Commission staff to discuss our risk management systems and processes. However, we do not believe that we can have a meaningful discussion in a public forum about our wager limits and risk management processes. Risk management, similar to trading (i.e., setting prices) is a core part of our business and our value proposition as a sportsbook, and it is critical for FanDuel to maintain confidentiality over our proprietary systems. We respectfully request the opportunity to meet privately in Executive Session to discuss these matters and provide the level of information necessary to properly understand our approach.

Thank you in advance,

Cory

Cory Fox

Vice President, Product and New Market Compliance

[REDACTED]
[REDACTED]



From: [Beauchemin, Crystal](#)
To: [Baer, Alyssa](#)
Subject: FW: Meeting Today
Date: Tuesday, May 21, 2024 10:36:43 AM

-----Original Message-----

From: Krum, Jacqui [REDACTED]
Sent: Tuesday, May 21, 2024 8:07 AM
To: Band, Bruce <bruce.band@massgaming.gov>
Cc: Williams, Douglas [REDACTED]
Subject: Meeting Today

Bruce,

Given the subject matter of the meeting today and its primary focus on the online sports wagering, we politely decline the invitation. If another meeting is scheduled and can be held in a more private setting, please let us know

Regards,

Jacqui

From: [Beauchemin, Crystal](#)
To: [Baer, Alyssa](#)
Subject: FW: MGC Roundtable re Wager Limitations
Date: Tuesday, May 21, 2024 10:36:48 AM
Attachments: [image001.png](#)

From: Lisa Rankin <[REDACTED]>
Sent: Monday, May 20, 2024 4:28 PM
To: Band, Bruce <bruce.band@massgaming.gov>
Cc: Kevin Fulmer [REDACTED]; Tina Spickerman [REDACTED]; Curtis Lane Jr [REDACTED]
Subject: MGC Roundtable re Wager Limitations

Bruce,

Please accept this e-mail as notification that Caesars Sportsbook has decided to decline participation in the MGC Roundtable on Wager Limitations scheduled for May 21, 2024.

Due to the proprietary nature of the subject matter, we would prefer not to discuss in a public forum. Respectfully, we would suggest rescheduling the discussion in a executive closed session with the Commissioners.

We appreciate the MGC staff's time on this matter.

Thank you,
Lisa



Lisa Rankin | Vice President of Compliance and Licensing

[REDACTED]
6325 S. Rainbow Blvd, Suite #100 | Las Vegas, NV 89118