

Massachusetts Gaming Commission

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Marketing Affiliates
Roundtable Discussion and
205 CMR 256.01(3)
(Sports Wagering Advertising)



Our Common Goal: Legal, Regulated Industry

Protect consumers, generate taxes, keep out bad actors.

Our Common Challenge: Established Illegal Industry

Huge head start on the internet; they lie about being illegal; super easy to find on the internet





**The internet works on an
affiliate marketing model.**

What's that?



Examples of Affiliate Marketing

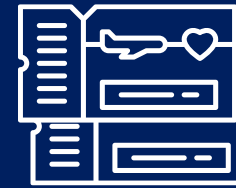


I want to travel.

Where can I get the cheapest flight?



Expedia



Perfect - I'll buy this Delta ticket!



I want to buy a 15 inch laptop.

I wonder which one is the best?



Wirecutter



I found a great deal. **I'll order this one now.**

Affiliate Marketing for Online Sports Betting



What happens if we *eliminate* Affiliate Marketing?





We all lose

and the illegal industry wins

Its not feasible to change the affiliate model because the internet is built around it.

There isn't a viable alternative to the existing affiliate compensation models

The biggest losers are consumers because they remain uneducated and they don't have choices.



The alternative will be...



LOTS
MORE PAID
ADVERTISING





It's
already
DOA

Affiliate Partners,

As you may know, the Massachusetts regulator has included language in its proposed regulations that prohibits sports betting operators from doing business under a CPA or rev share agreement with their third party partners. Essentially, any sort of performance marketing is illegal under these laws.

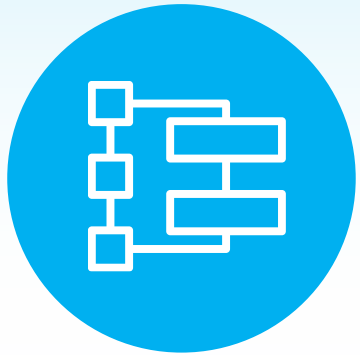
As a result, we are not planning on working with affiliates on any sort of revenue model under the current regulations. This includes fixed-fee sponsorship or media buying opportunities. We understand that this may alter your plans. We are equally as frustrated with the decision and will continue to monitor the progress of these regulations.

The MA regulator is meeting tomorrow, February 23rd, to discuss this amongst other agenda items. Should the regulator reverse their decision and allow for CPA agreements, we may revisit our stance. We will make sure to keep you updated as we hear more from our compliance team.

Thank you for your understanding and cooperation

--- The Caesars Affiliate Team

No Affiliate Marketing means...



No Affiliate Marketing



LOTS MORE
Untargeted
paid ads!



Thriving
illegal market



No consumer
protections



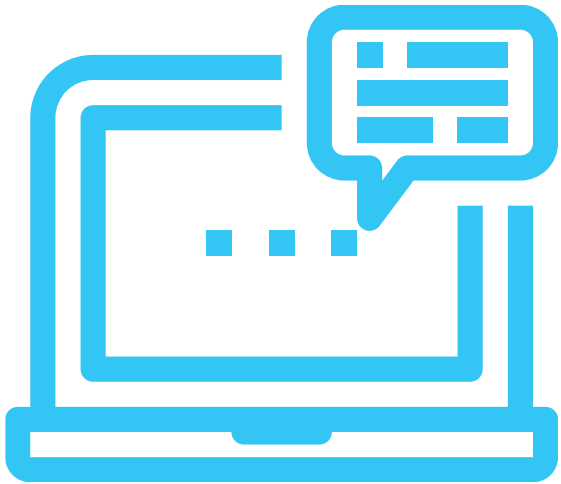
No tax
revenue
generated





What does **Affiliate Marketing** have to do with **Responsible Gaming**?

Affiliate Advertising Promotes Responsible Gaming



- Education
- Ability to compare value
- Understand the risks



How do other states handle affiliate marketing?

66%

of states
don't require
licensing

30+

states approve
revenue share /
CPA affiliate deals
(only 1 has prohibited this)





Diversity in Affiliate Marketing

**GAMING
SOCIETY**



ifrahlaw.com

THANK YOU