

**COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS GAMING COMMISSION**

In the Matter of)
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Application of Bally’s Interactive, LLC for a Temporary)
Untethered Category 3 Sports Wagering Operator License)
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**DECISION DEEMING BALLY’S INTERACTIVE, LLC
ELIGIBLE TO REQUEST A TEMPORARY
UNTETHERED CATEGORY 3 SPORTS WAGERING OPERATOR LICENSE¹**

I. Introduction

Bally’s Interactive, LLC (“Bally’s”) applied to the Massachusetts Gaming Commission (“MGC” or “Commission”) for an Untethered Category 3 Sports Wagering License. Under G.L. c. 23N, the Commission may issue up to seven Untethered Category 3 Licenses (“License”) to entities that offer sports wagering through mobile applications or other digital platforms that meet the requirements of c. 23N and the rules and regulations of the Commission. For the following reasons, the Commission hereby deems Bally’s eligible to request a temporary license.

II. Procedural History

On November 15, 2022, the Commission received Bally’s Sports Wagering License Application (“Application”), including the \$200,000 application fee. *See* G.L. c. 23N, § 7(A) and 205 CMR 214.01. The MGC Division of Licensing reviewed the Sports Wagering License Application for administrative sufficiency and determined that the application was sufficient. *See* 205 CMR 218.03. On January 3, 2023, the Commission held a virtual public meeting in order to hear public comment on all Category 3 Sports Wagering applications, *see* 205 CMR 218.05 and 205 CMR 218.06, which are contained in the Commission’s public record. On January 6, 2023, the Commission held a virtual public meeting to determine whether to issue Bally’s a preliminary finding of suitability, which included hearing an informal presentation from Bally’s and the Commission’s consultants. *See* 205 CMR 218.04(1)(a)-(b), 218.05(1)(b), 218.06(1). At that same meeting, the Commission deliberated on the Application, *see* 205 CMR 218.06(4)-(5), and on January 19, 2023, the Commission found Bally’s preliminarily suitable and eligible to request a Temporary License. *See* 205 CMR 215.01(2)(c)-(d), 218.07(1)(a).

III. Findings and Evaluation

In evaluating whether to issue the Category 3 Sports Wagering License to Bally’s, the Commission considered: all information in the application submitted by Bally’s; the public comments made on January 3, 2023; the presentations made by Bally’s and the Commission’s

¹ All facts referenced in this decision were current as of the date of the respective hearings referenced in the Procedural History for this applicant.

external consultants² on January 13, 2023; and a written report prepared by the Investigations and Enforcement Bureau (“IEB” or “Bureau”) in accordance with 205 CMR 215.01(2)(b).

In accordance with 205 CMR 218.06(5)-(6), in determining whether to deem Bally’s eligible to request a Temporary Sports Wagering License, the Commission evaluated all materials and information in the record to determine whether a license award would benefit the Commonwealth, and considered the following factors:

- a) Bally’s experience and expertise related to Sports Wagering, including:
 1. Bally’s ability to offer Sports Wagering in the Commonwealth;
 2. A description of Bally’s proposed Sports Wagering Platform;
 3. The technical features and operation of Bally’s proposed Sports Wagering Platform;

- b) The economic impact and other benefits to the Commonwealth if Bally’s is awarded a License, including:
 1. Employment opportunities within the Commonwealth;
 2. The projected revenue from wagering operations, and tax revenue to the Commonwealth;
 3. Community engagement;

- c) Bally’s proposed measures related to responsible gaming, including:
 1. Bally’s responsible gaming policies;
 2. Bally’s advertising and promotional plans;
 3. Bally’s history of demonstrated commitment to responsible gaming;

- d) A description of Bally’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, including:
 1. Within Bally’s workforce;
 2. Through Bally’s supplier spend;
 3. In Bally’s corporate structure;

- e) The technology that Bally’s intends to use in its operation, including:
 1. Geofencing;
 2. Know-your-customer measures; and
 3. Technological expertise and reliability;

² The consultants include RSM US LLP (“RSM”), which presented on Bally’s financial projections; Gaming Laboratories International LLC (“GLI”), which presented on technology considerations; and the Commission’s Investigations and Enforcement Bureau (“IEB”), which presented on Bally’s suitability.

- f) The suitability of Bally’s and its qualifiers, including:
1. Whether Bally’s can be or has been determined suitable in accordance with 205 CMR 215;
 2. Bally’s and all parties in interest to the license’s integrity, honesty, good character, and reputation;
 3. Bally’s financial stability, integrity, and background;
 4. Bally’s history of compliance with gaming or sports wagering licensing requirements in other jurisdictions;
 5. Whether Bally’s is a defendant in litigation involving its business practices; and
- g) Any other appropriate factor, in the Commission’s discretion.

In each case, the Commission decided whether each section of Bally’s application addressing these factors failed to meet, met, or exceeded expectations.

Ultimately, the Commission finds there is substantial evidence in the record to conclude that Bally’s proposed sports wagering operation meets the requirements set forth in G.L. c.23N and 205 CMR 218. The Commission adopts the following specific findings of fact and conclusions of law for Bally’s Application.

A. Experience and Expertise Related to Sports Wagering

Bally’s presented extensively on its international experience in sports wagering. Bally’s noted that the Gamesys PAM platform on which it operates has been in place in the UK for over a decade. Commissioners inquired about Bally’s bet types, including “if” bets, exotic parlay bets and progressive parlay bets.

Overall, there is substantial evidence that Bally’s proposal in the expertise and experience category meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Bally’s ability to offer Sports Wagering in the Commonwealth	With the merging of Bally’s, Bet.Works and Gamesys, Bally’s Interactive acquired and continued to build a platform and managed-services provider on which to launch its online sports betting offering to the respective markets. Bally’s initially rolled out launches of the Bally Bet app in Colorado, Iowa, Indiana, and Virginia, which was followed by introducing the updated technology (after the completing of the Gamesys transaction) to Arizona, New York and Ontario. The Bally’s Interactive technical team has extensive experience undergoing and successfully completing GLI testing (both 19 and 33) in five states.

	<p>The Bally’s team has decades of combined experience working with various provincial and state regulators. Members of Bally’s staff have been key members in launching various US casinos and sportsbooks (both retail and online) and participated in the development of the New Jersey online regulatory framework. Bally’s regulatory advisor worked for the New Jersey Division of Gaming Enforcement for 17 years. The Bally’s team has worked closely with the Iowa Racing and Gaming Commission and the South Dakota Commission on Gaming to help develop their sports betting regulations.</p> <p>Bally Bet, through Bally’s Interactive and affiliated entities, is licensed in the following jurisdictions: New York, Arizona, Colorado, Indiana, Iowa, Virginia, Ontario, Tennessee, and is pending in Maryland, Illinois, and Ohio.</p> <p>The Commission was satisfied by Bally’s ability to offer Sports Wagering in the Commonwealth.</p>
<p>Description of Bally’s proposed Sports Wagering Platform</p>	<p>The Bally Bet sportsbook will allow patrons to bet on over 600 market types and 70 different sports and competitions. In addition to the standard bet types, such as straights, totals (over/under), parlays, futures, and props, Bally’s will offer a variety of options including exotic parlays, if bets, “cash out,” and live betting. Most of Bally’s supported markets and leagues are those followed by U.S. bettors, including football (NFL, NCAA), baseball (MLB, NCAA), basketball (NBA, WNBA, NCAA), Golf, NHL, MMA, and eSports.</p> <p>Through the merging of Gamesys Group, Bally’s incorporated its world-class online gambling platform (Excite Platform) as a core component (PAM) for the new Bally Bet platform.</p> <p>Bally’s Las Vegas-based risk team provides risk management services for Bally Bet. The Risk and Trading team receives betting data from a variety of sports data companies including Don Best, SportRadar, and SportsIQ to set odds for each approved event. The Bally’s team can customize the feed to each jurisdiction based on approved events and most importantly prevents unauthorized events from being presented by jurisdiction.</p> <p>The Commission was satisfied by this described plan for Sports Wagering operations.</p>
<p>Technical features and operation of Bally’s proposed Sports Wagering Platform</p>	<p>Bally’s described the technical features and operation of its proposed Sports Wagering Platform on pages 68-72 of its Application and the Commission found it satisfactory.</p>

B. Economic Impact

Commissioners inquired about recruiting efforts at local colleges and universities and how Bally’s ensures that employees and interns are of legal age. Commissioners also inquired about Bally’s plans for recruiting employees in the Commonwealth and asked Bally’s to supplement its application with a list of specific jobs it plans to have in state.

Commissioners asked about Bally’s community involvement and expressed concern with the difficulty of ensuring community involvement for remote operators. Bally’s described the impact it has made through the Bally’s Foundation and explained its extensive network of volunteer opportunities for employees.

Overall, there is substantial evidence that Bally’s proposal in the economic impact category meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Employment opportunities	<p>Bally’s will seek to initiate partnerships with local colleges and universities that offer entry points for the development of customized curriculum in the Gaming industry. Bally’s may also engage the Massachusetts workforce in entrepreneurship, apprenticeships, and vocational learning for those seeking participation in certificate programs or associate degrees in hospitality, tourism, software development and related areas in alignment with the needs of the industry.</p> <p>The Commission was satisfied by this proposed employment plan.</p>
Projected revenue from wagering operations, and tax revenue	<p>Bally’s described its projected Sports Wagering revenue on pages 66 and 74-78 of its Application and the Commission found it satisfactory.</p>
Community engagement	<p>Across the entire Bally’s network, the company supports organizations through charitable giving and sponsorship. Bally’s has sponsored Pride Month events in the US. New relationships with the National LGBT Chamber of Commerce (NGLCC) are in development for 2023. The Company will also initiate relationships with non-profit and mission-based organizations like the Urban League, the United Way, and organizations supporting youth in sports and education.</p> <p>The Bally’s Foundation is an independent charity organization funded by Bally’s Corporation to address issues of mental health. The Foundation operates as an independent charity; it is also inextricably linked with Bally’s and its subsidiaries.</p>

	<p>Bally’s has also agreed to work on a partnership with the Massachusetts Lottery.</p> <p>The Commission was satisfied by Bally’s representations regarding its past, ongoing, and future plans for community engagement.</p>
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C. Responsible Gaming

Commissioners inquired about a variety of responsible gaming elements of Bally’s proposal. For example, they expressed concern with in-app real-time marketing. In response, Bally’s explained the player protections the company uses in the UK, noting that players have the ability to set their own limits. Bally’s can also set any limit on any player based on myriad information and explained that these same features could be included in Bally’s product in Massachusetts.

Commissioners also expressed concern with advertisements on mass transit, as a significant number of children use mass transit to get to school in Massachusetts. Bally’s agreed that it would keep advertising off mass transit or only advertise during times where children are less likely to be on transit if the Commission so decides.

Overall, there is substantial evidence that Bally’s proposal in the responsible gaming category meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Responsible Gaming Policies	<p>All of Bally’s Interactive’s newly hired Operations team members (including Customer Service, Fraud, Payments, KYC, and Quality/Excellence Teams) attend a 2-hour training on Responsible Gaming (“RG”). This presentation was created in conjunction with the Council on Compulsive Gambling for New Jersey and includes clinical-based training to help identify at-risk gamblers and training for Bally’s systems and features that are available for patrons to manage their own limitations. Annually, all team members are required to re-attend this two-hour training. Team members may also be required to attend this training before their annual renewal if they exhibit any concerns with their knowledge level when it comes to Responsible Gaming.</p> <p>The Responsible Gaming Manager, Operational Excellence Manager, and Director of Operational Excellence have all attended and passed a 30-hour enhanced training on Responsible Gaming.</p>

Bally Bet's site and apps prominently display RG logos at the top, linking to resources for patrons to learn more about responsible gaming. A responsible gaming link is present in the footer of all website content pages. A robust FAQ section of the site includes a dedicated RG portion that educates players of both on-site/in-app capabilities as well as outside resources to manage their gambling.

Bally's Interactive participates in Responsible Gaming Educational Awareness Months in March and September, proactively reminding patrons to bet responsibly and providing them with education and resources to best navigate their gaming experiences.

Bally's Interactive's Compliance, Legal and Marketing teams conduct a weekly session to review all proposed marketing and advertising initiatives to ensure that campaigns are compliant with all applicable regulations as well as Bally's interactive's Responsible Gaming Standards. Absent approval from this group advertising, promotional and marketing campaigns are prohibited from being initiated. Reviews focus on regulatory standards surrounding promotional mechanics, responsible gaming messaging and potential negative impact on the community.

Bally's Interactive staffs a team of Gaming Finance experts to review all high-value or high-risk financial transactions against applicable AML/FinCEN regulations. They are additionally reviewed by a dedicated Responsible Gaming Manager to identify patrons who may be gaming in a harmful way. If either group is uncomfortable with the levels at which a patron is playing, a process is in place to engage with the patron.

Bally's Interactive is currently working on the development of an automated multi-checkpoint system that will allow at-risk patrons to be identified and raised for review. Based on the player's risk profile, Bally's Interactive will proactively engage with the patron and provide various levels of support, including site/App capabilities to limit play, resources for patrons to assess and manage gambling, educational videos explaining the signs/risks/harm of problem gambling, imposing limits at Bally Interactive's discretion, and the full closure of the account in extreme circumstances.

The Commission was satisfied by Bally's responsible gaming policies.

<p>Advertising and Promotional Plans</p>	<p>Bally Bet has employed numerous tactics and strategies related to marketing its gaming products and services upon entering a new state. With forty percent (40%) of the Rhode Island customer base residing in Massachusetts, Bally’s has a unique opportunity to cross-sell its sportsbook to players that already have a built-in interest in gaming. Additionally, Bally’s plans to employ a similar strategy by investing in the brand power and fan bases of sports organizations in Massachusetts has it has done elsewhere with franchises such as the Cleveland Browns, Phoenix Mercury and most recently, the New York Yankees. Further, Bally’s purchase of Gamesys has given the company access to proprietary tools, machine learning, and an overall knowledgebase of digital marketing to enhance its marketing strategy.</p> <p>Bally’s will utilize channels such as paid search, paid social and display and Out-of-Home advertising to build up its database in the Commonwealth. Bally’s plans to take advantage of marketing opportunities related to public transit. In addition, Bally’s will use streaming TV/OTT services to segment and target the sports customer to help build its brand and drive users to the platform.</p>
<p>History of Dedicated Commitment to Responsible Gaming</p>	<p>Bally’s Corporation partnered with Future Anthem to analyze the extent to which player markers of harm may be driven by the games they choose to play.</p> <p>Bally’s Corporation will continue its partnerships with the NCPG as well as the AGA to proactively educate patrons about the harms associated with gambling and how to mitigate them.</p> <p>In 2020, Bally's spent more than 4,500 hours training staff members. The International Center for Responsible Gaming (ICRG) recently received a \$600,000 donation from Bally’s Corporation to support multi-year, cutting-edge scientific research on gambling among young adults and the usage and effectiveness of responsible gambling tools.</p> <p>The Commission was satisfied that Bally’s advertising and promotional plans would adhere to its responsible gaming policies.</p>

D. Diversity, Equity, and Inclusion

The Commission included Diversity, Equity, and Inclusion as stand-alone considerations to demonstrate the value it places on this category of an applicant’s application.

Commissioners asked Bally’s to expand on its efforts to ensure DEI in the organization. Bally’s explained that it has a DEI manager who works out of Rhode Island who specifically tracks the company’s DEI data.

Overall, there is substantial evidence that Bally’s proposal in the Diversity and Inclusion category meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
DEI within the workforce	<p>Bally’s retail properties are 51% female. Minorities make up 50% of Bally’s employees across its 17 casinos in 11 states, and the employee mix is highly representative of each property and the market demographics.</p> <p>Bally’s efforts to recruit and promote diversity in its workforce include but are not limited to posting employment opportunities in newsprint, radio, tv/media, and/or social media platforms, and attending relevant events at local institutions of higher education like the University of Massachusetts - Boston. Bally’s plans to initiate partnerships with local colleges and universities to offer entry points for the development of customized Gaming industry curriculum. Bally’s also intends to partner with other organizations to develop opportunities for entrepreneurship, apprenticeships, and vocational learning in the form of certificate programs or associate degrees in hospitality, tourism, and related areas in alignment with the needs of the industry.</p> <p>Bally’s strives to promote employees from within its own workforce to ensure promotion and recruitment of diverse candidates in managerial and leadership roles. Currently, the Bally’s strategy to create a continuous pipeline of upwardly mobile employees is fueled by UKG, a system that allows for tracking of administrative human resources functions while integrating recruitment tools that connect supervisors and their teams. Bally’s also utilizes professional development and leadership training portals, Discover U and Hone, which offer employees professional development.</p> <p>The Commission was satisfied by Bally’s workforce goals.</p>
DEI through supplier spend	<p>Bally’s will partner with Minority Business Enterprises (“MBEs”) and Women Owned Business Enterprises (“WBEs”), Service Disabled and Veteran Owned Business Enterprises (“VOBES”), Lesbian, Gay, Bisexual, and Transgender Business Enterprises, Business Enterprises operated by People with</p>

	<p>Disabilities, or organizations that support people with disabilities.</p> <p>Bally’s will initiate relationships with The Massachusetts Supplier Diversity Office (SDO) and work with the Governor’s Office of Access, Opportunity, and Community Affairs to review legislative or aspirational spend goals and align diversity spend opportunities with state requirements to meet agreed upon goals for MBE, WBE and VOBES. Bally’s is committed to working with “certified” Massachusetts businesses and non-profit organizations. Tracey G. Wiley is the Director of Diversity, Equity and Inclusion for Bally’s Corporation and brings a 20-year history of collaborating with diverse suppliers and small businesses in the non-profit and government sectors. She has led organizations like the Capital Region Minority Supplier Development Council and the former, Virginia Minority Supplier Development Council, now the Carolinas Virginia Minority Supplier Development Council in working with hundreds of minority businesses and over 200 Fortune 500 Corporations.</p> <p>Bally’s will seek membership in the Greater New England Minority Supplier Development Council to gain access to additional relationships with certified minority businesses. Bally’s will also align with other national organizations including the Women’s Business Enterprise National Council and their local affiliate to ensure sourcing opportunities to women-owned businesses.</p> <p>The Commission was satisfied by Bally’s supplier spend goals.</p>
<p>DEI in corporate structure</p>	<p>Bally’s has created an ESG Steering Committee to oversee and provide executive sponsorship for its corporate ESG strategy, goals and initiatives.</p> <p>Anita Iwugo leads Diversity, Equity, and Inclusion efforts for Bally’s Interactive. She brings over a decade of experience in technology, human rights, and developing the Company’s ERGs in the UK, and is based in London.</p> <p>The Commission was satisfied by the DEI efforts in Bally’s corporate structure.</p>

E. Technology

Bally’s uses its proprietary Excite gaming platform. Excite consists of a PAM, a high-performance wagering system, integration with KYC providers, and real-time marketing. The

platform is supported 24/7 by technology and operations teams in Europe and North America.

Overall, there is substantial evidence that Bally’s proposal in the technology category meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Geofencing	Bally’s described its geofencing measures on pages 60, 68, and 93-99 in its Application and the Commission found this portion of the application satisfactory.
Know your customer measures	Bally’s described its know your customer measures on pages 101-102 of its Application and the Commission found this portion of the application satisfactory.
Technological expertise and reliability	Bally’s described its technological expertise and reliability measures on page 68-70 and 108-113 of its Application and the Commission found this portion of the application satisfactory.

F. Suitability of Bally’s and Its Qualifiers

Commissioners noted that much of the information Bally’s provided with respect to suitability was at the parent company level, and expressed concern that although the parent company is well funded, it could still decide not to continue to fund sports wagering in the Commonwealth at any time. Bally’s noted that the decision to enter a new jurisdiction is an expensive investment, which in and of itself is an indication that the parent company would likely not easily pull out of the state.

Overall, there is substantial evidence that Bally’s proposal in the suitability category meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Suitability in accordance with 205 CMR 215	Bally’s is preliminarily suitable to hold a sports wagering license.
Bally’s and all parties in interest to the license’s integrity, honesty, good character and reputation	The IEB’s investigative report prepared for the purposes of this License decision has not revealed any disqualifying information concerning Bally’s or its qualifiers’ integrity, honesty, good character, or reputation.
Bally’s financial stability, integrity, and background	Bally’s Independent Audit Report and Material Weakness Statement submitted pursuant to 205 CMR 139.07(1), and its quarterly spending reports, have not revealed any disqualifying information concerning Bally’s or its financial stability, integrity, or background.

<p>Bally’s history of compliance with gaming or sports wagering licensing requirements in other jurisdictions</p>	<p>Bally’s Interactive was issued fines by the Indiana Gaming Commission (IGC) for \$1,500 when a media partner mistakenly aired a sports wagering promotion on its streaming service prior to Bally’s Interactive receiving approval for the promotion from the IGC. In response, the media partner agreed to provide Bally’s Interactive with the planned streaming schedule along with the broadcast advertising schedule.</p> <p>The IGC also issued Bally’s Interactive a \$500 fine for failing to timely notify the IGC of a position title change for a PD-1 license holder, a \$2,500 fine for multiple late notifications of employee terminations, a \$1,000 fine for the delayed submission of a self-exclusion reconciliation audit, and a \$1,625 for multiple discrepancies on the required self-exclusion audit. In response, Bally’s Interactive hired a dedicated Licensing Analyst and worked with the IGC and Bally’s Evansville Casino to enhance the self-exclusion reconciliation process.</p>
<p>Whether Bally’s is a defendant in litigation involving its business practices</p>	<p>In November 2021, Dr. Laila Mintas sued Betworks and David Wang (Betworks’ co-founder), and the Bally’s entities, as successors-in-interest, for fraud, failure to pay wages, breach of contract, and related contractual claims, alleging the defendants breached her employment agreement and is owed wages (\$60K) and stock worth (\$120K). Mintas is also seeking an undetermined amount of the value of the stock after Bally’s acquired Betworks. David Wang is separately seeking to be indemnified by Bally’s. On March 18, 2022, the case was dismissed without prejudice after parties agreed to arbitration. Discovery is ongoing.</p> <p>In May 2021, Georgian Pine (GP) filed an arbitration demand against Betworks Corp and Betworks (US), LLC, alleging the defendants and David Wang (Betworks’ co-founder) breached a consulting agreement. GP is seeking \$9.75 million as the value of unpaid stock. Bally’s requested indemnification from David Wang, pursuant to an indemnification agreement. The parties have agreed to arbitration and discovery is ongoing.</p>
<p>Any other appropriate factor in the Commission’s discretion</p>	<p>The Commission was concerned with Bally’s intention not to go live until Quarter 1 of 2024, despite having gone live in Ohio in January 2023. The Commission discussed conditioning Bally’s license on Bally’s agreeing not to transfer the license, but ultimately determined that such a condition would already be in place for all licensees under the Commission’s pending regulations.</p>

IV. Award

THE COMMISSION FINDS THAT THERE IS SUBSTANTIAL EVIDENCE IN THE RECORD THAT BALLY'S APPLICATION MEETS EXPECTATIONS IN ALL MAJOR CATEGORIES AND THAT BALLY'S IS ELIGIBLE FOR A TEMPORARY UNTETHERED CATEGORY 3 SPORTS WAGERING LICENSE

On November 21, 2022, the MGC received Bally's request for a temporary license, and an initial licensing fee of \$1,000,000 payable to the Commission. *See* 205 CMR 219.02(1). On January 6, 2023, the Commission deemed Bally's ("Licensee") eligible to request a Temporary Untethered Category 3 Sports Wagering Operator License ("License") pursuant to the terms and conditions of this Agreement ("Agreement"). On January 19, 2023, the Commission voted to issue the requested temporary license. *See* 205 CMR 219.02(3).

This License is subject to the following conditions:

1. Compliance with all of the requirements of G.L. c. 23N, as now in effect and as hereafter amended and 205 CMR, as now in effect and as hereafter amended.
2. Compliance with all applicable federal, state, and local laws, rules and regulations, now in effect or as hereafter amended or promulgated.
3. Compliance with the license conditions required to be inserted into all sports wagering licenses by 205 CMR 220, namely:
 - a. That the Licensee obtain an Operation Certificate before conducting any sports wagering in the Commonwealth.
 - b. That the Licensee comply with all terms and conditions of its license and Operation Certificate;
 - c. That the Licensee comply with G.L. c. 23N and all rules and regulations of the Commission;
 - d. That the Licensee make all required payments to the Commission in a timely manner;
 - e. That the Licensee maintain its suitability to hold a sports wagering license;
 - f. That the Licensee conduct sports wagering in accordance with its approved system of internal controls, and in accordance with its approved house rules, in accordance with G.L. c. 23N, § 10(a) and with 205 CMR; and
4. The Licensee post the License, in the form prescribed by the Commission, in a location continuously conspicuous to the public on the Licensee's Sports Wagering Platform and website at all times.

5. Payment of assessments made pursuant 205 CMR 221.00 in accordance with that regulation.
6. The Sports Wagering Operation shall substantially conform to the information included in the application filed by the Licensee and abide by all affirmative statements made in the Licensee's application.
7. The term of the temporary license awarded to Licensee commences upon February 23, 2023, and shall expire as set out in 205 CMR 219.03.

SO ORDERED

MASSACHUSETTS GAMING COMMISSION



Cathy Judd-Stein, Chair



Eileen M. O'Brien, Commissioner



Bradford R. Hill, Commissioner



Nakisha L. Skinner, Commissioner



Jordan M. Maynard, Commissioner

