

**COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS GAMING COMMISSION**

In the Matter of)
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Application of Blue Tarp reDevelopment, LLC for a)
Category 1 Sports Wagering Operator License)
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**DECISION APPROVING BLUE TARP REDEVELOPMENT LLC’S REQUEST FOR A
CATEGORY 1 SPORTS WAGERING OPERATOR LICENSE¹**

I. Introduction

Blue Tarp reDevelopment, LLC (d/b/a MGM Springfield) (“MGMS”), the holder of a gaming license under G.L. c. 23K § 2, applied to the Massachusetts Gaming Commission (“MGC” or “Commission”) for a Category 1 Sports Wagering License. Under G.L. c. 23N, the Commission may issue a Category 1 Sports Wagering License (“License”) to any holder of a G.L. c. 23K gaming license that meets the requirements of c. 23N and the rules and regulations of the Commission. For the following reasons, the Commission hereby approves MGMS’s request for a License.

II. Procedural History

On November 21, 2022, the Commission received MGMS’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 Application for administrative sufficiency and determined that the application was sufficient. *See* 205 CMR 218.03. On December 5, 2022, the Commission held a virtual public meeting to hear public comments on all Category 1 Sports Wagering applications, which are contained in the Commission’s public record. *See* 205 CMR 218.05 and 205 CMR 218.06. On December 7 and 19, 2022, the Commission held virtual public meetings to determine whether to issue MGMS a durable finding of suitability, which included hearing an informal presentation from MGMS and the Commission’s consultants. *See* 205 CMR 218.04(1)(a)-(b), 218.05(1)(b), 218.06(1). The Commission deliberated on the Application at the December 19, 2022, meeting, and at that same meeting found MGMS durably suitable and approved MGMS’s request for a License. *See* 205 CMR 215.01(2)(c)-(d), 218.06(4)-(5), 218.07(1)(a).

III. Findings and Evaluation

In evaluating whether to issue the Category 1 Sports Wagering License to MGMS, the Commission considered: all information in the application submitted by MGMS; the public comments made on December 5, 2022; the presentations made by MGMS and the Commission’s

¹ A 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 December 7 and 19, 2022; 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), in determining whether to approve MGMS’s request for a 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) MGMS’s experience and expertise related to Sports Wagering, including:
 - 1. MGMS’s ability to offer Sports Wagering in the Commonwealth;
 - 2. A description of MGMS’s proposed Sports Wagering operation;
- b) The economic impact and other benefits to the Commonwealth if MGMS was awarded a License, including:
 - 1. Employment opportunities within the Commonwealth;
 - 2. The projected revenue from wagering operations, and tax revenue to the Commonwealth;
 - 3. MGMS’s proposed plans for construction and capital investments associated with the License award;
 - 4. Community engagement;
- c) MGMS’s proposed measures related to responsible gaming, including:
 - 1. MGMS’s responsible gaming policies;
 - 2. MGMS’s advertising and promotional plans;
 - 3. MGMS’s history of demonstrated commitment to responsible gaming;
- d) A description of MGMS’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, including:
 - 1. Within MGMS’s workforce;
 - 2. Through MGMS’s supplier spend;
 - 3. In MGMS’s corporate structure;
- e) The technology that MGMS intends to use in its operation, including:
 - 1. Geofencing;
 - 2. Know your customer measures; and
 - 3. Technological expertise and reliability;
- f) The suitability of MGMS and its qualifiers, including:

² The consultants include RSM US LLP (“RSM”), which presented on MGMS’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 MGMS’s suitability.

1. MGMS's corporate integrity;
 2. The integrity of MGMS's individual qualifiers;
 3. MGMS's financial stability, integrity, and background;
 4. MGMS's history of compliance with gaming or Sports Wagering licensing requirements in other jurisdictions; and
- g) Any other appropriate factor, in the Commission's discretion.

Further, the Commission decided whether each section of MGMS'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 MGMS's proposed Sports Wagering operation meets the requirements set forth in G.L. c.23N and 205 CMR 218. The Commission further finds there is substantial evidence to adopt the following specific findings of fact and conclusions of law related to MGMS's application.

A. Experience and Expertise Related to Sports Wagering

MGMS reported its extensive experience in Sports Wagering through the experience of its parent company, MGM Resorts International ("MGMRI"), and MGMRI's joint venture with Entain, BetMGM. MGMS reported that MGMRI was the first company to accept a sports wager, doing so in 1979. In 2018, following the Supreme Court's ruling legalizing sports betting in the United States, MGMRI entered a joint venture with UK-based Entain and created BetMGM, which provides services in support of physical and virtual sports betting. As of December 2021, MGMRI and BetMGM operated physical sports betting enterprises in five cities and states, and BetMGM operated (physically and virtually) in 24 cities and states, with another seven secured or anticipated. As of December 2021, BetMGM's operations reached approximately 41% of the adult population in the United States and Canada. MGMS stated that for purposes of this Application, BetMGM would provide its services as a vendor to MGMS.

Commissioners expressed concerns with MGMS's potential reliance on BetMGM (a tethered Category 3 applicant) to conduct its sportsbook operations. MGMS President Chris Kelley clarified that BetMGM would be utilized as a platform for and service provider to MGMS's sportsbook operations. In this arrangement the operations of MGMS and use of BetMGM's platform and system would be exclusive to MGMS, meaning that operators and team members of MGMS's retail sportsbooks would not be BetMGM employees and would instead be MGMS employees. He further noted that in addition to providing a sportsbook platform and system, BetMGM would provide advisory and consulting services to MGMS regarding best practices, as well as managing a linked rewards system between BetMGM and MGM Resorts.

The Commission also expressed concern that because BetMGM is responsible for the trading services underlying each sports bet, MGMS could not fully oversee sports betting at MGMS and ensure integrity of the same. However, the Commission was ultimately satisfied that MGMS would exercise appropriate control over its Sports Wagering operation.

Accordingly, MGMS has demonstrated by substantial evidence that it has the experience and expertise, both locally and among its corporate affiliates, required to develop and operate a physical retail sportsbook. Therefore, MGMS’s proposal in the experience and expertise category meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
MGMS’s ability to offer Sports Wagering in the Commonwealth	For the reasons described above, the Commission unanimously agreed that MGMS has sufficient background in Sports Wagering and has been fully vetted in that regard.
Description of MGMS’s proposed Sports Wagering operation	<p>As MGMS explained in its presentation at the December 7, 2022, hearing, MGMS has already undertaken capital improvements and other steps to prepare for Sports Wagering at MGMS. Those steps include transforming an area of the gaming establishment previously used for slot machine play into a sports viewing area. That sports viewing area includes a 45-foot viewing wall, stadium seating, a VIP viewing area, and a bar. In anticipation of Sports Wagering, MGMS has also constructed an enclosed counter that can be used for staff operated point-of-sale, as well as space for wagering kiosks.</p> <p>Upon licensure, MGMS plans to convert the sports viewing lounge into a Sports Wagering lounge and place automated kiosks near the lounge, as well as in other locations around the gaming area. MGMS plans to utilize the same wager odds and writing software at the point-of-sale and automated kiosks.</p> <p>The Commission was satisfied by this described plan for Sports Wagering operations.</p>

B. Economic Impact

MGMS stated it anticipates that its physical retail Sports Wagering operation would initially create 15 new employment positions. MGMS further stated that it believed its physical retail Sports Wagering operation could create further employment opportunities downstream, as patrons that visit the retail sportsbook may also engage with other elements of MGMS’s integrated resort, creating demand for more employment opportunities across the MGMS property. MGMS also described the steps it has taken to enhance its position as an employer of choice and to improve the team member experience, such as offering free meals, health care and other benefits, higher compensation, and training.

Commissioners expressed concerns about MGMS’s expected non-gaming wagering revenue, which MGMS described in its application as zero. MGMS clarified that its projects were conservative in order to account for hiring difficulties. MGMS stated that it nonetheless believed

there would be opportunity to generate non-gaming wagering revenue from bars and restaurants near the proposed Sports Wagering area. The Commission was ultimately satisfied that MGMS’s projected revenues, while conservative, were sufficient.

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

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Employment opportunities within the Commonwealth	<p>As MGMS explained in its presentation at the December 7, 2022, hearing, it would hire 15 positions directly connected to the sports book. If patrons engaged with other parts of the MGMS property, such as its restaurants and movie theatre, MGMS would potentially hire for more positions across the property to meet that demand. These positions would be in addition to MGMS’s current workforce.</p> <p>The Commission was satisfied by this proposed employment plan.</p>
Projected revenue	MGMS described its projected Sports Wagering on pages 41-47 of its Application and the Commission found it satisfactory.
Construction plans	<p>MGMS invested \$4 million in April 2021 to convert an area of its gaming floor previously used for slot machine play into a sports viewing lounge with stadium seating and a 45-foot viewing wall. MGMS has also created an enclosed counter that can be used for staff operated point-of-sale betting, and space for Sports Wagering kiosks. That conversion and construction was completed in August 2021.</p> <p>MGMS has ordered and received 9 Sports Wagering kiosks and will install an additional 9 for a total of 18 Sports Wagering kiosks. Kiosks will be installed near the sports viewing lounge, as well as in other gaming areas of MGMS.</p> <p>The Commission was satisfied by MGMS’s construction plans to create a Sports Wagering area.</p>
Community engagement	MGMS has longstanding partnerships with local and regional community groups, tourism, economic development organizations, and various third-party stakeholders, including the Springfield Regional Chamber of Commerce, the Economic Development Council of Western Massachusetts, the Springfield Business Improvement District, and the Greater Springfield

	<p>Convention and Visitors Bureau. MGMS is also involved with multiple charitable organizations and events in Springfield and western Massachusetts, including the Puerto Rican Parade, Pride Parade, local soup kitchens, Habitat for Humanity, Walk for the Cure, Adopt a School, Rachel’s Table, and the Mayflower Marathon.</p> <p>MGMS will maintain its ongoing relationship and agreement with the Lottery and will continue to host lottery kiosks, lottery points of sale, and keno at the MGMS property.</p> <p>The Commission was satisfied by MGMS’s representations regarding its past, ongoing, and future plans for community engagement.</p>
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C. Responsible Gaming

MGMS described its history of commitment to responsible gaming and its efforts to ensure patrons engage in responsible gaming, regardless of the form of gaming. Since the introduction of GameSense, MGMS has licensed and integrated GameSense’s platform into its offerings company wide. MGMS has also undertaken efforts to increase messaging and awareness of GameSense, including by advertising GameSense on marquees, low-rise signage, and QR codes. Upon licensure for Sports Wagering, MGMS stated it would tailor GameSense information to focus on its Sports Wagering products in addition to the other platforms.

In addition to utilizing GameSense, MGMS trains all its employees on the fundamentals of responsible gaming and its responsible gaming programs. MGMS’s goal is to build employee awareness, confidence and commitment so employees are informed and confident when they engage with customers and can enforce positive play.

MGMS also offers responsible gaming programs such as voluntary self-exclusion and self-limitations. MGMS has a policy of verifying the identification and age of any patron who appears under the age of 30.

Commissioners asked MGMS to elaborate on its marketing practices and how MGMS it ensures responsible gaming principles are adhered to in its marketing efforts, particularly considering a recent fine levied against MGMS in Ontario. MGMS stated it follows industry best practices, including the American Gambling Association’s code of conduct. To that end, MGMS does not market on college and university campuses and does not advertise alcohol and gambling together. With respect to its national advertising campaigns, MGMS stated its marketing and compliance team work closely together to review language to ensure any language included in radio advertisements, print advertisements, and billboards does not violate any applicable regulations. With respect to the incident resulting in a fine by Ontario regulators, MGMS stated it was a result of human error, and MGMS has since retrained its staff on what is and is not permissible to advertise in Ontario. The Commission was ultimately satisfied that despite MGMS’s past fines for violating responsible gaming

requirements, MGMS has demonstrated a commitment to responsible gaming in its Sports Wagering and advertising and marketing policies.

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

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Responsible gaming policies	<p>As MGMS explained in its presentation at the December 7, 2022, hearing, MGMS has fully adopted GameSense through its licensing and integration of GameSense’s platform into its offerings. MGMS assists patrons onsite by referring them to a GameSense advisor and by providing problem gambling helpline information. In partnership with the MGC, Massachusetts Council on Gaming and Health, and the American Gaming Association, MGMS promotes responsible gaming year-round through on-site, external, and social media messaging channels.</p> <p>MGMRI trains all employees on responsible gaming. In the past 12 months, it has conducted 55,000 trainings, and certified more than 200 GameSense advisors, including 11 in Springfield. Upon licensure, MGMRI’s Director of Responsible Gaming, Garret Farms, will travel to Springfield to conduct in-person responsible gaming training with sportsbook employees.</p> <p>The Commission was satisfied by MGMS’s responsible gaming policies.</p>
Advertising and promotional plans	<p>MGMS abides by the American Gaming Association Responsible Gaming Code of Conduct and the American Gaming Association’s Sports Wagering Marketing Code of Conduct. MGMS does not advertise on or in proximity of college campuses. MGMS does not advertise alcohol and gaming together.</p> <p>MGMS will only market to those eligible to participate in gaming and Sports Wagering. As with current messaging, any gaming or Sports Wagering products will include problem gambling assistance and age-related restriction verbiage.</p> <p>The Commission was satisfied that MGMS’s advertising and promotional plans would adhere to its responsible gaming policies.</p>

History of demonstrated commitment to responsible gaming	See Responsible Gaming Policies, above.
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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.

As explained by MGMS during the December 7, 2022, hearing, MGMS implements its diversity, equity, and inclusion goals by focusing on its people, culture, and suppliers. Its people strategy is focused on attracting, developing, and retaining diverse talent and ensuring that diverse talent has equal access to leadership opportunities. To do so, MGMS embeds diversity and inclusion across its human resources practices, from recruiting, to onboarding, to mentoring, to succession planning and promotion. MGMS also actively seeks to grow its supplier diversity program and offers mentorship to diverse suppliers.

Commissioners inquired as to how MGMS would drive diversity spending efforts, given its stated reliance on BetMGM to provide platform and trading services. MGMS stated MGMS would be solely responsible for driving diversity goals, including hiring and contracting.

Commissioners also noted that while MGMS has met its goal with respect to employing veterans, it has not yet met its women in the workforce goal. MGMS described difficulties recruiting and hiring women since the COVID-19 pandemic, but stated it is adjusting its hiring and promotion efforts to attract and retain more women. The Commission was ultimately satisfied that while it has not met its women in the workforce goals as of the December 2022 hearings, it is actively working to bring more women into its workplace.

There is therefore substantial evidence that MGMS’s commitment to Diversity, Equity, and Inclusion meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Workforce	<p>MGMS’s workforce has the following demographics: 40% women, 5% veterans, 77% from the Commonwealth, 39% from Springfield, 75% from Western Massachusetts, and 51% from ethnic minority groups. The Commission noted MGMS has met its workforce goal with respect to veterans, but has not met its goal with respect to women.</p> <p>With the launch of the Sportsbook, MGMS will add 15 employees, and will emphasize recruitment of individuals from surrounding communities, ethnic minority groups, and women. In support of that goal, MGMS sponsors and recruits candidates from local, regional, state, and/or national organizations</p>

	<p>committed to the development and promotion of diversity, equity and inclusion initiatives, including Veterans, Inc., Jobs Corps, AARP, Dress for Success, YWCA, Goodwill, Urban League, ROCA, and Putnam Vocational High School.</p> <p>The Commission was satisfied by MGMS’s workforce goals.</p>
Supplier spend	<p>MGMS has the following goals with respect to its supplier spend: 10% on minority-owned business enterprises, 15% on women-owned business enterprises, and 2% on veteran-owned business enterprises.</p> <p>To meet its goals, MGMS will continue to work with the Greater New England Minority Supplier Development Council and the Center for Women & Enterprise and will participate in vendor matchmaking events which have helped MGMS identify new diverse suppliers. MGMS will also continue to use the Supplier io platform to identify certified diverse vendors.</p> <p>The Commission was satisfied by MGMS’s supplier spend goals.</p>
Corporate structure	<p>Of MGMS’s 11 Directors, 18.2% are racially diverse (2/11) and 36.4% are women (4/11). The Board has established a Corporate Social Responsibility Committee and a Social Impact & Sustainability Sub-Committee with accountability for DEI strategy and goals.</p> <p>The Commission was satisfied by MGMS’s corporate structure.</p>

E. Technology

MGMS plans to offer its Sports Wagering product in close coordination with BetMGM, which will provide the platform and services for MGMS’s sportsbook. Since launching three years ago, BetMGM has grown to offer Sports Wagering and igaming in 25 cities and states across North America and has the leading market share in several of those jurisdictions. GLI, technology consultants to the Commission, noted that while they have not tested BetMGM’s platform, BetMGM’s platform has been tested by other independent testing labs to GLI’s standards and has met the technology requirements of those jurisdictions.

However, Sports Wagering is more dynamic than land-based gaming operations, and as a result the initial testing and certification, while essential, is only the beginning. BetMGM intends to undertake continuing efforts in cooperation with regulatory bodies to ensure secure operations. A network security task force is essential to these systems in the long run.

Commissioners asked MGMS to explain the degree to which Entain, one of the companies that forms the joint venture from which BetMGM originates, is involved in BetMGM’s betting platform, which MGMS will utilize to provide its retail sportsbook. MGMS stated that Entain is a platform provider for mobile operations separate from BetMGM and is therefore inapplicable to MGMS’s retail point of sale.

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

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Geofencing	Not applicable. As a retail entity offering in-person Sports Wagering, geofencing is not an applicable technology.
Know your customer	MGMS described its know your customer measures on page 98 of its Application and the Commission found it satisfactory.
Technological expertise and reliability	MGMS described its technological expertise and reliability on page 99 of its Application and the Commission found it satisfactory.

F. Suitability of MGMS and Its Qualifiers

MGMS has undergone extensive investigations in relation to its Category 1 Operator’s License, and in 2014 the Commission found MGMS and each of its then individual entity qualifiers suitable in connection with MGMS’s application for a gaming license. As new qualifiers joined MGMS, they were required to submit to full investigations as well, all of which are reviewed in the materials the IEB submitted to the Commission in accordance with 205 CMR 215.02. The criteria for suitability to hold a gaming license are substantially aligned with the criteria for suitability to hold a Sports Wagering license, and as a result the Commission used information obtained in past suitability investigations to evaluate MGMS’s suitability for a Sports Wagering license.

Since 2014 when MGMS received its Category 1 Operator’s License, MGMS and its qualifiers, both initial and later, have continued to maintain suitability. Through its near decade of operation in the Commonwealth, MGMS has demonstrated a record of compliance with MGC rules and regulations and has self-reported violations and taken voluntary and proactive corrective actions when necessary.

The Commission discussed whether BetMGM should be evaluated as a qualifier, based on MGMS’s proposal to offer its sports book in close cooperation with BetMGM. The Commission ultimately determined that where BetMGM functions as a vendor, it was not necessary to evaluate BetMGM as a qualifier. Nonetheless, BetMGM would undergo a preliminary review to receive a vendor license, and later a full suitability review.

The Commission entered executive session to discuss a recent BetMGM data breach and the confidential investigation conducted by BetMGM regarding said breach in accordance with G.L. c. 30A, § 21(a)(7) and G.L. c. 23N, § 6(i). The Commission ultimately concluded the matter did not negatively impact MGMS’s suitability and would be further investigated.

The Commission may determine that an applicant or qualifier is suitable to hold a Sports Wagering license based on (1) the applicant and its qualifiers, or the qualifier, certifying to their suitability under the pains and penalties of perjury, and (2) the IEB’s investigative report. *See* 205 CMR 215.01(2)(a). The Commission deliberated on MGMS’s suitability during its deliberations on MGMS’s application on December 19, 2022. *See* 205 CMR 215.01(2)(c). Based on MGMS’s and its qualifiers’ certifications, the IEB’s investigative report, information obtained through previous investigations into MGMS and its qualifiers as described above, the Commission determined that MGMS and its qualifiers are suitable to hold a Sports Wagering license. *See* 205 CMR 215.01(2)(d)(1).

The Commission is satisfied with MGMS’s suitability, and that of its qualifiers. It therefore found MGMS durably suitable, and concluded there is clear and convincing evidence that MGMS’s suitability meets expectations.

SUMMARY OF EVALUATION BY CRITERIA	
Criteria	Finding
Corporate integrity	MGMS is suitable to hold a Sports Wagering license.
Individual qualifier integrity	The IEB’s past investigations of MGMS and the IEB’s investigative report prepared for the purposes of this License decision have not revealed any disqualifying information concerning MGMS or its qualifiers’ integrity, honesty, good character, or reputation.
Financial stability, integrity, and background	MGMS’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 MGMS or its financial stability, integrity or background. Furthermore, MGMS’s operations as an integrated resort, which allow it to maintain other gaming and non-gaming revenue streams, are sufficiently robust to ensure its financial stability in the event of a Sports Wagering downturn.
Compliance	In 2020, the Pennsylvania Gaming Control Board issued a complaint that alleged violations of Pennsylvania’s post-employment restrictions related to the hiring of a former Pennsylvania employee by an MGMRI subsidiary. MGMRI ultimately entered into a settlement agreement and paid a fine and administrative costs.

	<p>Of concern, in 2009, MGMRI entered into a stipulation of settlement with the New Jersey Casino Control Commission and agreed to withdraw its renewal application for a casino license and sell its 50% interest in the Borgata Hotel and Casino in Atlantic City. The New Jersey Casino Control Commission allowed MGMRI to reapply for licensure in New Jersey in 2013, and MGMRI was granted a license in 2014.</p>
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IV. Award

THE COMMISSION FINDS THAT THERE IS SUBSTANTIAL EVIDENCE IN THE RECORD THAT MGMS’S APPLICATION MEETS EXPECTATIONS IN ALL CATEGORIES AND THAT MGMS IS ELIGIBLE FOR A CATEGORY 1 SPORTS WAGERING LICENSE.

On December 19, 2022, the Commission approved MGMS’s (“Licensee’s”) request for a Category 1 Sports Wagering Operator License (“License”) pursuant to the terms and conditions of this Agreement (“Agreement”). On November 21, 2022, the MGC received MGM’s request for a License, and a licensing fee of \$5,000,000 payable to the Commission. *See* 205 CMR 219.02(1). On December 19, 2022, the Commission voted to issue the requested License. *See* 205 CMR 219.02(3).

This License is subject to the following conditions:

1. Compliance with all 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 all terms and conditions of the Resort-Casino License for the Gaming Establishment at MGMS dated June 13, 2014.
4. Compliance with the license conditions required 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; and
 - 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.
5. The Licensee post the License, in a form prescribed by the Commission, in a location continuously conspicuous to the public within the Sports Wagering Area at all times.
 6. Payment of assessments made pursuant 205 CMR 221.00 in accordance with that regulation.
 7. Compliance with any requirements to obtain federal, state and local permits and approvals to construct and operate the Sports Wagering area, and any conditions or requirements set forth therein.
 8. The Sports Wagering Operation shall agree to the information included in the application filed by the Licensee.
 9. The term of the License awarded to Licensee commences upon December 19, 2022, and shall be subject to renewal as set out in G.L. c. 23N, § 6(f).

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